

HHSC Draft RFP: Independent Evaluator RFP No. 530-06-7355

<p>Name of Individual Completing Response F. Scott McCown, Executive Director Tiffany Roper, Policy Analyst</p>	<p>Brief Explanation of Interest In Publicly Funded Child Welfare Service The Center for Public Policy Priorities (CPPP) is a nonpartisan, nonprofit research organization committed to improving public policies to better the economic and social conditions of low- and moderate-income Texans. CPPP is home to Texas KIDS COUNT, a state-by-state and county-by-county effort to track and promote the well-being of children. F. Scott McCown is a retired state district judge who heard over 2,000 child abuse and neglect cases concerning over 4,000 children. He now serves as director at the center. Tiffany Roper is an attorney who has represented CPS as an assistant attorney general, assistant county attorney, and assistant district attorney. Ms. Roper has also represented children as an attorney ad litem with the UT Children’s Rights Clinic. Ms. Roper now serves as a policy analyst for child welfare at the center.</p>	<p>Do You Currently Have Contracts With DFPS <input type="checkbox"/> Yes XX No If yes, complete the box below. Provide information for each contract you have with DFPS</p>
<p>Name of Entity Represented Center for Public Policy Priorities 900 Lydia Street Austin, Texas 78702 512-320-0222 512-320-0227 (Fax) www.cppp.org</p>		<p>1. Type of Service 2. Area/Region of Texas Served</p>

Section	Line Number	Proposed Wording Change	Comment or Question
1.1 (Mission Statement)	11 (p. 10)	Define “community-based” delivery of substitute care and case management services.	The Draft RFP fails to define “community-based” delivery of substitute care and case management services. In order for a privatized system to be effectively evaluated, its core component must be defined.
1.4 (Scope of Outsourced Services) (B. Case Management Services)	97 (p. 13)	Add to the first sentence: “Case management services means the provision of case management services to a child for whom the department has been appointed temporary or permanent managing conservator and the child’s family, ”	The definition of case management services must include the child’s family as the primary goal of casework is family reunification.
	102 (p.13)	This line should be reworded as follows: “preparing court reports, attending all judicial hearings (delete permanency hearings), and ensuring...”	The current structure of this sentence is misleading regarding the type of hearings to be attended. Permanency hearings are just one type of hearing that a caseworker normally goes to. This line needs to be reworded to require attendance at all judicial hearings. This rewording will eliminate any ambiguity about the type

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			of hearings which must be attended.
1.4 (Scope of Outsourced Services)	133 – 135 (pp. 14)		We encourage the continued inclusion of the requirement that the IE would complete required evaluation and reports procured under this RFP, even if DFPS operates in the IA role.
1.5 (Evaluation of Outsourcing)	185 – 186 (p.15)	Add (6) Assess compliance with the law.	The IA must comply with all state and federal law, just as DFPS now does.
1.5.2 (DFPS Multi-Disciplinary Team)	193 et seq. (p. 16)	The MDT will consist primarily of specialized staff who can measure critical dimensions of private sector performance in delivering substitute care and case management services, but shall also include outside stakeholder representatives, including members of the judiciary and legal community handling child welfare cases, child advocacy groups, and service provider organizations.	Outside voices must be included in the multi-disciplinary team to adequately evaluate the privatized model, including but not limited to child protection judges, the Texas Association of District and County Attorneys (TDCAA), Court Appointed Special Advocates (CASA), Texans Care for Children, and other interested stakeholders.
	204 – 210 (p. 16)	Add 4) Compliance with state and federal laws.	The IA must be held to the same legal accountability as DFPS.
	214 (p. 16)	Add a sentence requiring that the MDT evaluate and report on the IA's achievement of performance-based milestones and on the effect of the IA's performance on the quality of permanency services provided at least once per six month period during the first year of the IA's contract.	Because the privatized system represents a move in an uncharted direction, the MDT must evaluate the IA's performance more often at the beginning of the start-up and transition periods to accurately identify problems and to provide feedback to the IA in a timelier manner.
2.1 (Project Scope)	400 – 422 (p. 25)		Is DFPS concurrently working on a model for privatization of Region 8 in the event that an acceptable IA is not found? Critics and proponents of a privatized substitute care and case management system need to know whether DFPS can do better.
2.1.2 (Objectives of Evaluation)	434 – 435 (p. 26)	Add (6) Assess compliance with the law.	As mentioned previously, the IA must comply with all state and federal law, just as DFPS is required to do.
2.1.3	446 – 450 (p. 26)	Add the definition of "cost beneficial".	There is no definition of "cost beneficial". Without a

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(Evaluation Components)			definition, how can the IE determine what cost beneficial is? Is the definition of cost beneficial simply "is this worth paying for"?
2.5 (Deliverables)	693 – 699 (p. 34)	Add: The written analysis is due to DFPS on or before January 31, 2007. One electronic copy and 50 hard copies of the preliminary analysis of child and family outcomes in the outsourced region must be submitted to DFPS for distribution to the Texas legislature and other stakeholders no later than January 31, 2007.	Under the proposed deliverables, the Texas Legislature and other interested stakeholders would not receive a written report from the IE until December 31, 2008. Given the huge change in the way substitute care and case management services will be handled, the Legislature and other stakeholders must be kept apprised of findings prior to this date.
2.7 (Contractor Responsibilities)	767 (p. 36)		This section is the only one that mentions direct contact, via presentations, between the IE and stakeholders regarding evaluation progress or report results. Stakeholders must be included in the evaluation process to identify existing and future issues and to offer input into appropriate remedies. Having stakeholders participate simply as recipients of reports will mean a loss of valuable information for the IE.

Please feel free to enter additional rows to accommodate all comments. This table will expand as necessary.