



No States Have Ever Passed the Child and Family Services Reviews: Findings from an Analysis Over the Last 25 Years

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KEY POINTS

- In the past 25 years, zero states have passed the Child and Family Services Review (CFSR) process.
 - No state has ever “passed” (achieved substantial conformity on) all seven performance outcomes and all seven systemic factors.
 - As a result, all states have been on Program Improvement Plans (PIPs) following each of the first three rounds of the CFSR process.
 - Despite poor success in Round 1, the number of performance outcomes and systemic factors successfully achieved by states has continually declined even further each round.
 - Early results from the current round of reviews suggest that, most likely, no state will “pass” this round either.
- Although the process does not seem to be driving program improvement, it is costly and burdensome.
 - Estimates from the most recent round range from at least \$443,757 in costs to the federal government *per state* for state-led CFSRs to as much as \$620,678 in costs *per state* to the federal government for federally-led CFSRs.
 - These figures underestimate the true cost of this process, as they do not account for state costs – including those ultimately reimbursed by the federal government.
- Challenges with the CFSR process include that PIPs do not seem to improve these poor outcomes over time, as well as that there are substantial costs, administrative burdens, and financial penalties resulting from the process.
 - If the goal is sustainable performance improvement, then the CFSRs might not be effectively measuring state child welfare agency performance that is indicative of promoting child safety, permanency, and well-being.

Child and Family Service Reviews (CFSRs) are administered by the Children’s Bureau (CB) in the U.S. Department of Health and Human Services (HHS) with the aim of ensuring state conformity with federal child welfare requirements. This brief synthesizes experiences over the past 25 years of the CFSR, providing an overview of the process, analyzing collective state performance across rounds, and highlighting costs and challenges.

WHEN DID THE CFSR BEGIN?

In 1994, amendments to the Social Security Act authorized HHS to ensure conformity with child welfare Title IV-E and Title IV-B requirements.¹ In 2000, CB published a final rule (45 C.F.R. 1355.31-37) to formally establish the CFSR process for overseeing child welfare programs in states and territories.² Under the CFSR process, states and territories are required to achieve substantial conformity across a number of performance outcomes and systemic factors.¹

CB and states have completed three rounds of CFSRs: Round 1 (2001-2004); Round 2 (2007-2010); and Round 3 (2015-2018). Round 4 is currently in progress (2023-2027).

HOW DOES THE CFSR WORK?

CFSRs focus on conformity with seven performance outcomes and seven systemic factors. As specified in law and regulation, the seven performance outcomes pertain to safety, permanency, and well-being.³

Performance outcomes in the **safety domain**:

1. Children are, first and foremost, protected from abuse and neglect, and;
2. Children are safely maintained in their homes whenever possible and appropriate.

Performance outcomes in the **permanency domain**:

1. Children have permanency and stability in their living situations, and;
2. The continuity of family relationships and connections is preserved for children.

Performance outcomes in the **well-being domain**:

1. Families have enhanced capacity to provide for their children's needs;
2. Children receive appropriate services to meet their educational needs, and;
3. Children receive adequate services to meet their physical and mental health needs.

Systemic factors are specified in regulation, associated with the federal Child and Family Service Plan requirements, and help promote positive safety, permanency, and well-being outcomes.³

Seven systemic factors:

1. The statewide information system;
2. The case review system;
3. The quality assurance system;
4. Staff and provider training;
5. The service array and resource development;
6. Agency responsiveness to the community, and;
7. Foster and adoptive parent licensing, recruitment, and retention.

The multi-phase CFSR process involves significant coordination between states and the federal government. The statewide assessment phase involves a data profile created by CB and an assessment written by the state using quantitative and qualitative data that informs the onsite review process. The onsite review is a joint federal-state process that involves case reviews and interviews with child welfare system partners, such as community agencies, courts, foster families, case workers, services providers, and parents and youth. States also have the option to lead their own onsite reviews with permission from CB. If states fail to meet substantial conformity on even one performance outcome or systemic factor, they must submit a Program Improvement

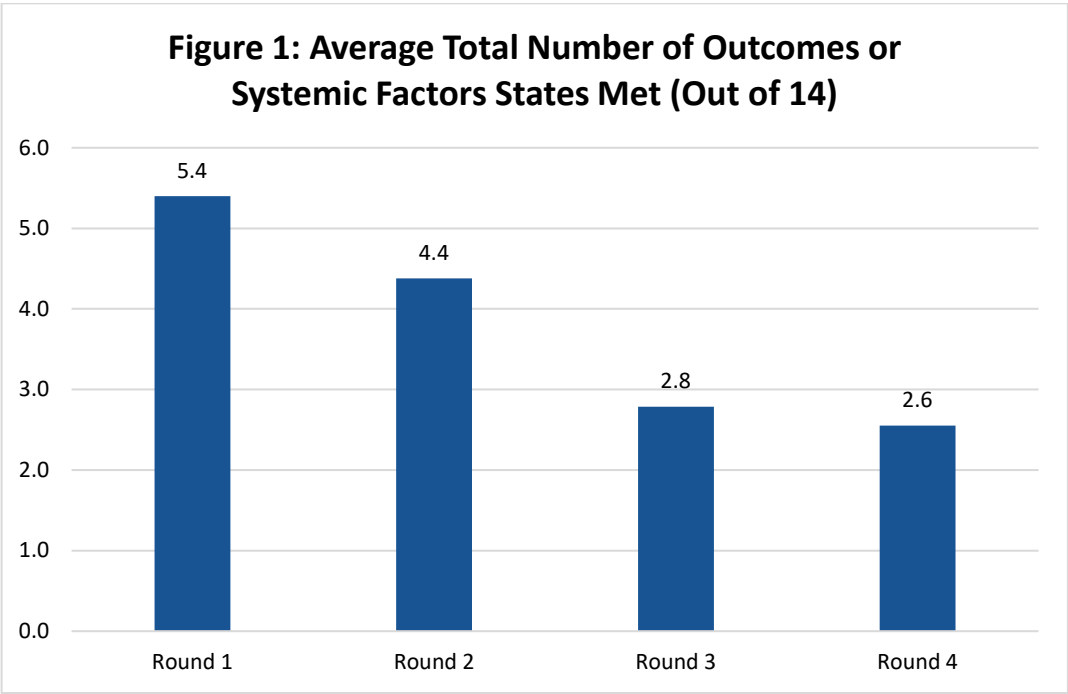
Plan (PIP) to CB. States can be financially penalized for failure to implement the PIP or failure to meet specific goals specified in their PIP measurement plan. The PIP process must involve child welfare stakeholders, partners, parents, and youth.³

For more detailed information on the review process, please visit the [Children’s Bureau CFSR Web Page](#) or the [CFSR Information Portal](#).

HOW HAVE STATES PEFORMED ON THE CFSR?

Data across CFSR rounds were aggregated to understand how the process is functioning and if it is functioning as intended. Results from Rounds 1-3 show that **no states were ever in substantial conformity with (“passed”) all seven performance outcomes and all seven systemic factors.**^{4,5,6} Furthermore, while Round 4 is currently in progress, no state has yet to achieve substantial conformity across all performance outcomes and factors.

Importantly, **CFSR performance is also declining over time** on both outcomes and systemic factors. Figure 1 shows that states met an average of 5.4 (out of 14) outcomes or systemic factors in Round 1, declining to an average of 4.4 in Round 2, 2.8 in Round 3, and 2.6 in Round 4 to date.ⁱ While 12 states improved between rounds 1 and 2, only five states improved between rounds 2 and 3, and only four states to date have improved between rounds 3 and 4.



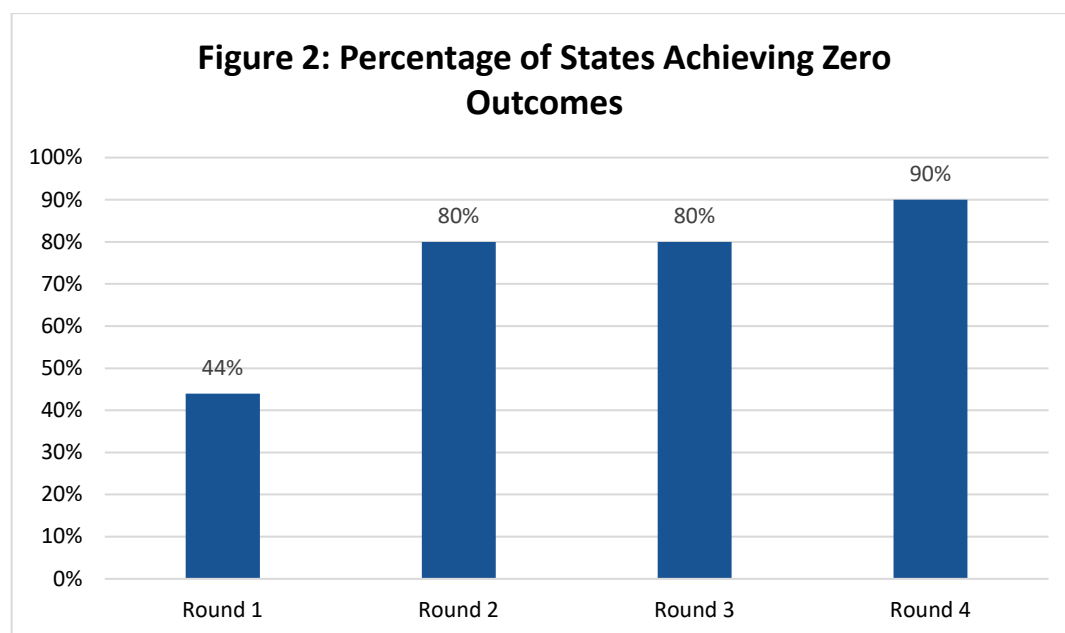
In Rounds 2-4, only a few states achieved substantial conformity on even one or two of the seven performance outcomes. While Round 4 is still underway, there are only two states (out of 20 states so far) achieving substantial conformity on *any* of the seven performance outcomes, as shown in Table 1.

ⁱ Note: Original analysis by authors based on data from Child and Family Services Reviews (CFSR) Final Reports, Rounds 1-4, published by the U.S. Department of Health and Human Services, Administration for Children and Families, Children’s Bureau (2001-2023). Rounds 1 and 2 include data from all 50 states; Round 3 includes all 50 states and the District of Columbia; Round 4 is in progress and includes 20 states with published final reports.

Table 1. Percentage of States Achieving Substantial Conformity on Performance Outcomes (Rounds 1-4)ⁱⁱ

Outcome	Description	Round 1	Round 2	Round 3	Round 4
Safety Outcome 1	Children are, first and foremost, protected from abuse and neglect	10%	0%	8%	10%
Safety Outcome 2	Children are safely maintained in their homes when possible	12%	0%	0%	0%
Permanency Outcome 1	Children have permanency and stability in their living situations	0%	0%	0%	0%
Permanency Outcome 2	The continuity of family relationships and connections is preserved	13%	0%	0%	0%
Well-being Outcome 1	Families have enhanced capacity to provide for children's needs	0%	0%	0%	0%
Well-being Outcome 2	Children receive services to meet their educational needs	31%	19%	12%	5%
Well-being Outcome 3	Children receive services to meet their physical and mental health needs	2%	0%	0%	0%

As seen in Figure 2, the share of states not in compliance with any of the seven outcomes continues to increase across rounds.ⁱⁱⁱ While 44 percent of states achieved zero of the performance outcomes in Round 1, that increased to 80 percent in Rounds 2-3 and 90 percent to date in Round 4.



ⁱⁱ Note: Original analysis by authors based on data from Child and Family Services Reviews (CFSR) Final Reports, Rounds 1-4, published by the U.S. Department of Health and Human Services, Administration for Children and Families, Children's Bureau (2001-2023). Rounds 1 and 2 include data from all 50 states; Round 3 includes all 50 states and the District of Columbia; Round 4 is in progress and includes 20 states with published final reports.

ⁱⁱⁱ Same note as above.

Furthermore, Table 2 shows the percentage of states achieving substantial conformity on individual systemic factors. There is substantial variation in how states perform on each systemic factor. While the vast majority of states have achieved substantial conformity on Agency Responsiveness to the Community across all rounds, very few states are in compliance with Case Review System and Service Array (and no states are in compliance in Round 4 to date).

Table 2. Percentage of States Achieving Substantial Conformity on Systemic Factors (Rounds 1-4)^{iv}

Systemic Factor	Round 1	Round 2	Round 3	Round 4
Statewide Information System	90%	78%	53%	35%
Case Review System	26%	2%	4%	0%
Quality Assurance System	68%	78%	51%	50%
Training	66%	70%	25%	35%
Service Array	44%	18%	6%	0%
Agency Responsiveness to the Community	94%	98%	92%	90%
Foster and Adoptive Parent Licensing, Recruitment, and Retention	82%	74%	27%	30%

WHAT ARE THE COSTS AND CHALLENGES OF THE CFSR?

There are substantial costs and administrative burden associated with the CFSR process for both the federal government and states:^v

- For federally-led CFSRs, estimated costs to the federal government from Round 4 range from \$532,010 to \$620,678 per state, including an estimated 1,989 hours of federal staff time.
- For state-led CFSRs, estimated costs to the federal government from Round 4 range from \$443,757 to \$516,287 per state, with an estimated 1,220 hours of federal staff time.

Federal government costs do not include those incurred by each state to engage in the CFSR process, which are substantial, given the intensive nature of the process. Given that CB partially reimburses states for administrative costs associated with the process, the above estimates understate the financial burden of CFSRs for the federal government.

Moreover, there are other federal processes that increase both the federal and state administrative burden related to CFSRs, such as the Child and Family Services Plans (CFSPs). Emerging analyses of CFSP annual reports show that they not only place a significant burden on states to prepare but also involve significant federal staff time to review and process the information included.

^{iv} Note: Original analysis by authors based on data from Child and Family Services Reviews (CFSR) Final Reports, Rounds 1-4, published by the U.S. Department of Health and Human Services, Administration for Children and Families, Children's Bureau (2001-2023). Rounds 1 and 2 include data from all 50 states; Round 3 includes all 50 states and the District of Columbia; Round 4 is in progress and includes 20 states with published final reports.

^v Note: Original analysis by the Administration for Children and Families (ACF) based on estimates of staff time and other expenses for CB staff.

CFSP and CFSR reporting requirements entail:

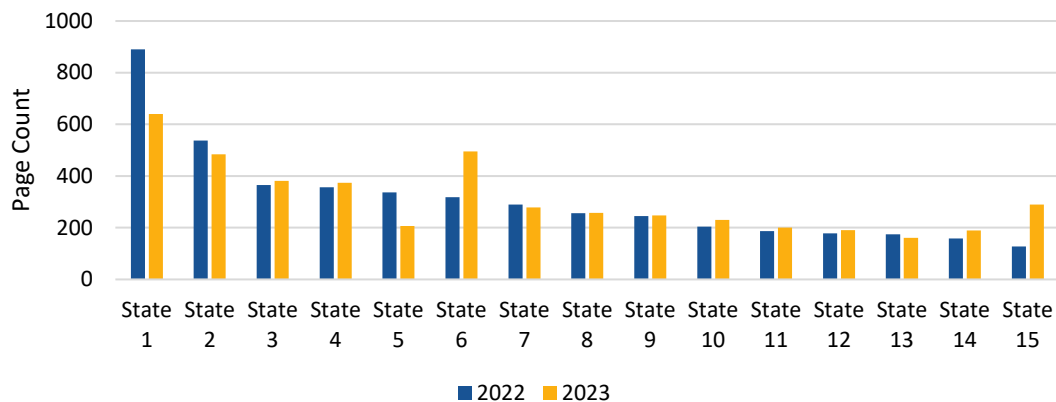
To be eligible for federal funding, jurisdictions are required to report annually on progress toward their five-year CFSP through the **Annual Progress and Services Report (APSR)**. The APSR primarily serves to demonstrate progress and maintain annual funding continuity.

In addition, jurisdictions must meet separate reporting and monitoring requirements under the CFSR **Program Improvement Plan (PIP)** process. PIP monitoring determines whether performance aligns with the specific practice outcomes identified for improvement.

Findings from an analysis of FY2022 and FY2023 APSRs reveal the considerable administrative burden federal and state and Tribal agencies face through annual reporting. Across fifteen states that represent all ACF Regions, the analysis identified significant variation in how states prepare, organize, and present their reports, underscoring the scope and inefficiency of current reporting requirements. Reading time was estimated using an average adult reading speed of 238 words per minute, and the Flesch Reading Ease score was applied to evaluate text complexity and readability:

- Average report length: 256 pages (approximately 102,000 words), as shown in Figure 3.^{vi}
- Average reading time: 7.18 hours per report, or roughly 430 minutes.
- Range of total reading time: Most states required 560-1,618 minutes for a complete review.
- Extended review times: Over the two years, seven state submissions required 9-26 hours each to read.
- Average readability: Flesch Reading Ease score of 28.17 (very hard), indicating high complexity and difficulty with interpretation.

Figure 3: APSR Page Count by State (2022 vs. 2023)



Beyond length and readability, Table 3 (below) shows that a substantial portion of APSR content submitted by states was duplicative with the prior year, indicating limited differentiation between reporting cycles.^{vii} Median duplication rates ranged from 41 percent to 78 percent across sections.

^{vi} Note: Original analysis by the Administration for Children and Families (ACF) based on data from Annual Progress and Services Reports (APSR) (2022-2023).

^{vii} Same note as above.

These findings illustrate how overlapping reporting requirements, including those related to the CFSR, CFSP and APSR, generate cumulative administrative burden for both states and the federal government. Paperwork Reduction Act (PRA) analyses can also estimate the total annual burden in hours related to the various reporting requirements for federal staff, using average full time equivalent (FTE) hourly rates to calculate the corresponding cost estimates in Table 4 (below).^{viii}

Table 3: Percent Duplication Across APSR Reports 2022-2023

APSR Section	Percent Duplication Prior Year (Median)
Financial Information	78%
Executive Summary/Overview	69%
State Vision and Progress Updates	64%
Updates to Targeted Plans under Title IV-B	64%
Appendix/Attachments	61%
Statistical and Supporting Information	58%
Cover/Table of Contents	58%
Quality Assurance System	58%
Update on the Service Descriptions	57%
CAPTA State Plan Requirements and Updates	56%
Collaboration	53%
John H. Chafee Foster Care Program for Successful Transition to Adulthood	52%
Update to the Assessment of Current Performance in Improving Outcomes	47%
Consultation and Coordination Between States and Tribes	41%

Table 4: Total Annual Burden Hours for Federal FTEs for Reporting Requirements

Instrument	Jurisdictions	Average Burden Hours Per Jurisdiction	Total Burden Hours	Cost estimates for Federal FTEs
45 C.F.R. 1355.33(b) Statewide Assessment	52	120	6,240	\$187,200
45 C.F.R. 1355.339(c) On-site Review Instrument, Stakeholder Instrument Guide	52	1,186	61,672	\$1,850,160
45 C.F.R. 1355.35(a) Program Improvement Plan	52	300	15,600	\$468,000
Total	52	1,606	83,512	\$2,505,360

As detailed above, states are not successfully achieving substantial conformity on performance outcomes and systemic factors, and performance is declining over time, not improving. All states in Rounds 1-3 were required to submit PIPs.^{4,5,7} This **suggests that the PIP process may not be resulting in its intended effects.**

^{viii} *Note:* Original analysis by the Administration for Children and Families (ACF) based on data from Annual Progress and Services Reports (APSR) (2022-2023).

PIPs are costly to both states and the federal government:

- The federal government incurs significant technical assistance contracting costs to support the implementation of state PIPs.
- States are financially penalized for failure to successfully implement a PIP or achieve specified measurement goals.
- State PIPs average 44 pages, representing a significant investment of time and resources in their development and analysis.^{ix}

In theory, if PIPs improved state performance on outcomes and factors, there would be an increase in substantial conformity over time. Therefore, without sustainable performance improvement, it appears the the CFSR process is not functioning as intended. It may not be measuring the right outcomes and factors or the outcomes as currently measured may not be capturing information that is indicative of child safety, permanency, and well-being.

HOW DO THESE RESULTS LOOK IN THE CONTEXT OF OTHER HUMAN SERVICES PROGRAMS?

While there is variation in purpose and depth across federal human services program performance assessments, states have successfully demonstrated both improvement and meaningful variation in other human services areas. For example, through the Child Support Performance and Incentive Act of 1998, Congress sought to better align the incentive system for the Title IV-D Child Support Program to its mission of promoting responsible parenting.

Since then, states have made strong progress across all five measures and nearly all the measures have remained at these higher levels over time. In FY2024, all states/territories except the District of Columbia and two territories had performance levels above the thresholds necessary to receive some incentive payments for all five measures, compared to 43 states/territories in FY2002. There were particularly dramatic improvements in paternity and order establishment, and in FY2024 all but seven states/territories exceeded the performance incentive ceilings (80 percent) for both measures.^{8,9}

- On the paternity establishment measure, in FY2000, the IV-D establishment percentage was 72 percent overall and increased over time, such that since FY2014 every reporting state/territory has achieved at least 100 percent, and the statewide establishment percentage has remained above 90 percent every year except FY2020. (States may report either IV-D program or statewide percentage.) In FY2002, 40 states/territories achieved the performance incentive ceiling on this measure while in FY2024 all states and all but one territory did.
- Child support orders were established in 60 percent of cases in FY2000, rising to 85 percent in FY2014 and remaining above that level since. In FY2002, only 14 states achieved the performance incentive ceiling on this measure compared to 47 states/territories in FY2024.
- Fifty-four percent of current child support owed was collected in FY2000. This rose to 65 percent or greater in every year since FY2015. Thirty-five states/territories had rates lower than 60 percent in FY2002 compared to 14 in FY2024.
- For the more difficult to collect arrears (past due support), on average states made a collection in 59 percent of cases in which arrears were owed in FY2000. This rose to 63 percent in FY 2014 and has remained at that level or higher since. Twenty-one states/territories achieved less than 60 percent in FY2002 compared to 15 states/territories in FY2024.

^{ix} Note: Original analysis by the Administration for Children and Families (ACF).

- Only one measure, cost-effectiveness, fell back to its FY2000 level in FY2024 after generally sustaining improvement through FY2021, with 16 states/territories achieving the full incentive level by producing cost effectiveness ratios of \$5.00 or higher.^x

CONCLUSION

The CFSR process, while intended to help states conform with federal child welfare requirements, has a high cost for both the federal government and states. With few states achieving success in performance outcomes and systemic factors, and with declining performance over time, it may be time to re-evaluate the utility of the CFSR process to better assess and drive child welfare program outcomes.

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^x Note: Original analysis by the Office of the Assistant Secretary for Planning and Evaluation (ASPE) based on data from the Office of Child Support Enforcement (OCSE-157) in the Administration for Children and Families.

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