

IDAHO

Child and Family Services Review

FINAL REPORT
August 2003



**U.S. Department of Health and Human Services
Administration for Children and Families
Administration on Children, Youth and Families
Children's Bureau**

EXECUTIVE SUMMARY

Final Report: Idaho Child and Family Services Review

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Idaho. The CFSR was conducted the week of May 12, 2003. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency – the Idaho Division of Family and Community Services, Bureau of Children and Family Services (CFS);
- The State Data Profile, prepared by the Children’s Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 1999 through 2001;
- Reviews of 50 cases at three sites throughout the State; and
- Interviews or focus groups (conducted at all three sites and at the State-level) with stakeholders including, but not limited to children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys.

A key finding of the Idaho CFSR is that Idaho achieved substantial conformity on Permanency Outcome 2 and Well Being Outcome 2. The CFSR determined that the State is effectively placing children in close proximity to their families and helping children to retain relationships with their families and to maintain other important connections while in foster care, including using relatives as placement resources appropriately. The State is also effectively addressing the educational needs of children.

The two weakest areas of State performance on the outcomes occurred for Permanency Outcome 1 (Children have permanency and stability in their living situations) and Well Being Outcome 1 (Families have enhanced capacity to provide for their children’s needs). The State also was not in substantial conformity on Safety Outcome 1 and Safety Outcome 2. For Well Being Outcome 1, all of the items assessed for this outcome were identified as needing improvement for the State. One key finding relevant to this outcome pertained to the inconsistency in the quality of assessments conducted to determine families’ service needs as well as potential risk areas. A general finding of the case reviews was that assessments were not sufficiently comprehensive to identify underlying issues and service needs. Another key finding was that in Ada and Bannock Counties, but not in Nez Perce County, parents and children were not consistently involved in the case planning process.

For Permanency Outcome 1, although the State met national standards for reunifying children and finalizing adoptions in a timely manner, the onsite case reviews yielded less favorable findings for these items. In addition, the State did not meet the standards for placement stability or foster care re-entries. However, performance on this outcome varied among the three counties. While almost all of the Bannock County cases were rated as having substantially achieved this outcome (83%), only a few of the cases in Nez Perce (17%) and Ada (38%) Counties were rated as having substantially achieved this outcome. A key finding for this outcome was that permanency goals were not being established in a timely manner and the agency was not filing for termination of parental rights in accordance with the requirements of the Adoption and Safe Families Act.

With regard to the systemic factors, the State was determined to be in substantial conformity with the systemic factors of Statewide Information System; Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. The strongest area of performance occurred for the factor of Agency Responsiveness to the Community, with all indicators for this systemic factor rated as a Strength. The State did not achieve substantial conformity with the systemic factors of Case Review System, Training, Service Array, or Quality Assurance System. A key finding was that training of staff and foster care providers was not of sufficient quality or quantity to promote positive job performance. Finally, the CFSR determined that there is a lack of culturally relevant services and Native American foster homes for Native American children and families.

The overall findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance relative to the national standards and table 4 provides information pertaining to the State's substantial conformity with the seven systemic factors assessed through the CFSR.

I. KEY FINDINGS RELATED TO OUTCOMES

Safety Outcome 1: Children are first and foremost protected from abuse and neglect

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1) and the other relates to the recurrence of substantiated or indicated maltreatment for the same children (item 2).

Idaho did not achieve substantial conformity for Safety Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 83.3 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.

- The State did not meet the national standard for the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period.

However, the State did meet the national standard for the percentage of children maltreated while in foster care.

The data in the table for Safety Outcome 1 demonstrate considerable variation between the counties included in the onsite review. In Bannock and Nez Perce Counties, 100 percent of the cases were determined to have achieved this outcome compared to only 65 percent of the cases in Ada County.

The case reviews in Ada County revealed inconsistent practices with respect to the timeliness of initiating a response to child maltreatment reports and establishing face-to-face contact with children and families. Although in some cases workers did respond in a timely manner, in 50 percent of the applicable Ada County cases, face-to-face contact with the alleged child victim was not established in accordance with the State's required time frames. Responses that did not meet State requirements occurred to both priority II (2 cases) and priority III (6 cases) reports.

Case reviews did not identify extensive repeat maltreatment as it is measured for the CFSR (item 2). However, the maltreatment recurrence data reported in the State Data Profile indicate that Idaho did not meet the national standard for this measure.

Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate

Performance relevant to Safety Outcome 2 is assessed through 2 indicators. One indicator (item 3) addresses the issue of the DCFS' efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to the DCFS' effectiveness in reducing the risk of harm to the child.

Idaho did not achieve substantial conformity with Safety Outcome 2. This determination was based on the finding that this outcome was substantially achieved in 71.4 percent of the cases reviewed, which does not meet the 90 percent required for a rating of substantial conformity.

As with Safety Outcome 1, there was a considerable difference in achievement of Safety Outcome 2 between Ada County and the other two counties included in the CFSR. In Ada County, only 52 percent of the cases were determined to have substantially achieved this outcome, compared to 92 percent in Bannock County and 83 percent in Nez Perce County.

Although there were many cases in which reviewers determined that CFS had made concerted efforts to prevent removal and reduce risk of harm, there were concerns about the needs and risk assessment processes. Reviewers identified a substantial percentage of cases in which the services provided to prevent removal and the efforts to reduce risk of harm were not adequate because there was either no assessment or the assessment conducted was insufficient. In some cases, reviewers noted that the assessment focused on the immediate crisis rather than on underlying causes, such as domestic violence and substance abuse. Because substance abuse, particularly methamphetamine abuse, was identified by stakeholders as a major concern in the State, failure to address substance abuse issues in the risk assessment process was viewed as having the potential for leaving children at home at high risk.

Several stakeholders commenting on this issue reported that in some locations the agency assigns priority to working with families with court-ordered services, and therefore has little time to work with cases that do not involve court-ordered services. Other stakeholders expressed the opinion that when services are not court ordered, social workers do not have the necessary skills to engage families in services on a voluntary basis. Some stakeholders reported that the safety and risk assessment forms in FOCUS (the agency's information and tracking system) are too limited and restrictive to be useful in conducting a comprehensive assessment of a family to determine both risk and service needs.

Permanency Outcome 1: Children have permanency and stability in their living situations.

There are 10 indicators incorporated in the assessment of Permanency Outcome 1, although not all of them are relevant for all children. The indicators pertain to DCFS' effectiveness in preventing foster care re-entry (item 5), ensuring placement stability for children in foster care (item 6), and establishing appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining indicators focus on DCFS' success in achieving permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9), or whether children who have other planned living arrangements are in stable placements and adequately prepared for eventual independent living (item 10).

Idaho did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 48.0 percent of the cases, which is less than the 90 percent required for an overall rating of substantial conformity.
- The State Data Profile indicates that for Federal fiscal year (FFY) 2001, the State did not meet the national standards for (1) the rate of foster care re-entries, and (2) the percentage of children in foster care for 12 months or less who experienced no more than 2 placements.

The State did meet the national standards for the percentage of children in FFY 2001 who were (1) reunified within 12 months of entry into foster care and (2) discharged to finalized adoptions within 24 months of entry into foster care.

The differences among counties with regard to achieving Permanency Outcome 1 are particularly noteworthy. In Bannock County, 100 percent of the 6 applicable cases were determined to have substantially achieved this outcome, compared to 38 percent of the 13 applicable cases in Ada County and 17 percent of the 6 applicable cases in Nez Perce County. This difference is noteworthy in light of the Bannock County stakeholders' descriptions of the system in that county for achieving permanency. Stakeholders in that county indicated that the CFS agency, the Court, and the Deputy Attorney General engage collaboratively to achieve permanency in as timely a manner as possible. Case review results for Bannock County with regard to permanency outcome 1 suggest that this approach is successful for promoting timely permanency.

A key concern identified pertaining to permanency was that the goal of reunification is being maintained for too long a period of time before changing the goal to adoption, even when it is clear that reunification is not likely to occur. Other barriers to timely permanency included: putting cases on a "holding pattern" while the parent is incarcerated without engaging in concurrent planning; delays in filing for termination of parental rights (TPR); delays in completing paperwork necessary to expedite adoption process; and the reluctance of some judges to seek TPR, particularly for older children.

Permanency Outcome 2. The continuity of family relationships and connections is preserved for children.

Permanency Outcome 2 incorporates six indicators that assess DCFS' performance with regard to: (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Idaho achieved substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 92.0 percent of the cases, which is greater than the 90 percent required for substantial conformity.

The CFSR findings indicate that CFS makes concerted efforts to place children in close proximity to their families, to promote and maintain parent-child relationships, to ensure frequent visitation between children and their parents and siblings in foster care, to seek and assess relatives as placement resources, and to preserve children's connections to their families and racial and religious heritage.

A key area of concern with respect to this outcome pertained to efforts to place siblings together in foster care. Case reviewers and stakeholders noted that there was a lack of available foster family resources to accommodate sibling groups of 3 or more children.

Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

Well Being Outcome 1 incorporates four indicators. One pertains to DCFS' efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator assesses DCFS' effectiveness with regard to actively involving parents and children (when appropriate) in the case planning process (item 18). The two remaining indicators examine the frequency and quality of DCFS caseworker contact with the children in their caseloads (item 19) and the children's parents (item 20).

Idaho did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved for 42.0 percent of the cases reviewed, which is less than the 90 percent required for a determination of substantial conformity.

Although achievement of Well-Being Outcome 1 was low in all counties, cases were more likely to be rated as having substantially achieved this outcome in Nez Perce County (58%), than in Ada County (32%) or Bannock County (46%). This difference was most apparent with regard to involving parents in case planning and the frequency of social worker contacts with parents and children. It was not found for the item pertaining to meeting the service needs of children, parents, and foster parents.

The case reviews resulted in ratings of Area Needing Improvement for all of the indicators of child and family well-being outcome 1. Reviewers determined that CFS was not consistent in assessing and addressing the service needs of children and their parents, in involving parents and children in the case planning process, and in establishing sufficient face-to-face contact between social workers and the children and parents in their caseloads. In general, CFS was more likely to be rated as a Strength for these indicators when the children were in foster care than when the children remained in their homes.

Well Being Outcome 2: Children receive appropriate services to meet their educational needs.

There is only one indicator for well being outcome 2 that pertains to DCFS' effectiveness in addressing children's educational needs (item 21). Idaho achieved substantial conformity with Well-Being Outcome 2 based on the finding that 93.8 percent of the cases reviewed were found to have substantially achieved this outcome, which meets the 90 percent required for substantial conformity.

Well Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

This outcome incorporates two indicators that assess DCFS' efforts to meet children's physical health (item 22) and mental health (item 23) needs.

Idaho did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 66.7 percent of the 42 applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

Differences across counties were again marked with respect to attainment of this outcome. In Nez Perce County 90 percent of the cases were found to have substantially achieved this item compared to 69 percent of the cases in Bannock County and 53 percent of the cases in Ada County. The key concern identified pertained to a lack of consistency in assessing children's physical and mental health needs when there was evidence that an assessment was warranted.

II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS

Statewide Information System

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care.

Idaho is in substantial conformity with this factor because the State's information system, the Family Oriented Community User System (FOCUS) meets these requirements, although some stakeholders raised concerns about the currency of the data at any given point in time.

Case Review System

Five indicators are used to assess the State's performance with regard to the systemic factor of a Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek termination of parental rights (TPR)

in accordance with the timeframes established in the Adoption and Safe Families Act (ASFA) (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

Idaho did not achieve substantial conformity with the systemic factor of case review system. One key concern identified with regard to this factor pertained to the lack of involvement of parents in the case planning process. This was revealed in both the case reviews and the stakeholder interviews. Stakeholders noted that the agency's ability to involve parents in the case planning process is compromised when the court dictates the case plan or attorneys discourage their clients from participating. Another concern pertained to inconsistencies with respect to seeking TPR in accordance with ASFA timeframes. Again, this was found in both the case reviews and the stakeholder interviews. Stakeholders reported that while some judges adhered to ASFA timeframes, others postponed TPR for as long as possible in order to give parents more time to bring about needed changes. A third concern identified through the CFSR was that foster parents are not consistently given the opportunity to be heard in reviews or hearings involving their foster children.

Despite these concerns, stakeholders were in agreement that foster care cases are reviewed at least every 6 months, and that 12-month permanency hearings are held in a timely manner.

Quality Assurance System

The State's performance with regard to the systemic factor of Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30) and whether the State is operating a statewide quality assurance system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

Idaho is not in substantial conformity with the systemic factor of quality assurance system. Although the State has standards to ensure that children in foster care are provided quality services that protect their safety and health, it does not have a fully implemented statewide quality improvement system. Stakeholders commenting on the issue of a quality improvement system noted that the State has begun the process of quality improvement by implementing the Continuous Quality Improvement (CQI) system, but that the CQI was not fully functional at the time of the CFSR. Stakeholders noted that thus far, the CQI has not been applied to the full continuum of child welfare cases in all offices. In addition, although it incorporates case reviews, it does not have a mechanism for feedback that ensures that measurable program improvement occurs at the local and State levels.

Training

The systemic factor of Training incorporates an assessment of the State's new worker training program (item 32), ongoing training efforts for child welfare agency staff (item 33), and training for foster and adoptive parents (item 34).

Idaho is not in substantial conformity with the systemic factor of Training. Stakeholders reported that initial training is not sufficiently comprehensive and that not all new social workers receive the initial training prior to being assigned a caseload. While ongoing training for social workers is adequately provided per State requirements, there is no overall training strategy designed to meet the needs of the agency. Some foster parent orientation training is available, but the requirement to attend is inconsistently applied and the content is limited. Ongoing training for foster and adoptive parents is inadequate.

Service Array

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have in place an array of services that meets the needs of children and families served by the child welfare agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? And (3) Can services be individualized to meet the unique needs of the children and family served by the child welfare agency (item 37)?

Idaho is not in substantial conformity with the systemic factor of Service Array. Although the State has an extensive array of services, there are many barriers to accessing them and the State is not effective in individualizing services for children and families.

Agency Responsiveness to the Community

The systemic factor of Agency Responsiveness to the Community incorporates the extent of the State's consultation with external stakeholders in developing the Child and Family Services Plan (items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally assisted programs serving the same population.

Idaho achieved substantial conformity with the systemic factor of Agency Responsiveness to the Community. The State's Child and Family Services Plan is developed in conjunction with representatives from other agencies, including Tribes. The agency also has strong collaborations with external stakeholders on the State and local levels and is effective in ensuring the coordination of services with other State, local, Tribal and community-based agencies.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children.

Idaho is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment and Retention. The State has established standards for licensing and approving foster family homes and child care institutions and those standards are applied to all licensed or approved out of home care facilities. The State also accesses inter-jurisdictional resources to facilitate adoption or permanent placement for waiting children. Idaho does not have a statewide recruitment plan that is providing the resources needed for waiting children and there is also a need for a comprehensive effort to retain foster parents.

Table 1. CFSR Ratings for Safety and Permanency Outcomes and Items

Outcomes and Indicators	Outcome Ratings			Item Ratings		
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards?</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Safety Outcome 1-Children are first and foremost, protected from abuse and neglect	No	83.3	1 of 2			
Item 1: Timeliness of investigations				ANI	74	
Item 2: Repeat maltreatment				ANI	97	No
Safety Outcome 2 - Children are safely maintained in their homes when possible and appropriate	No	71.4				
Item 3: Services to prevent removal				ANI	78	
Item 4: Risk of harm				ANI	71	
Permanency Outcome 1- Children have permanency and stability in their living situations	No	44.0	2 of 4			
Item 5: Foster care re-entry				ANI	100	No
Item 6: Stability of foster care placements				ANI	76	No
Item 7: Permanency goal for child				ANI	64	
Item 8: Reunification, guardianship and placement with relatives				ANI	55	Yes
Item 9: Adoption				ANI	46	Yes
Item 10: Other planned living arrangement				ANI	67	
Permanency Outcome 2 - The continuity of family relationships and connections is preserved	Yes	92.0				
Item 11: Proximity of placement				Strength	95	
Item 12: Placement with siblings				ANI	72	
Item 13: Visiting with parents and siblings in foster care				Strength	91	
Item 14: Preserving connections				Strength	96	
Item 15: Relative placement				Strength	88	
Item 16: Relationship of child in care with parents				Strength	100	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI)

Table 2. CFSR Ratings for Child and Family Well Being Outcomes and Items

Outcomes and Indicators	Outcome Ratings		Item Ratings			
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Well Being Outcome 1 - Families have enhanced capacity to provide for children's needs	No	42				
Item 17: Needs/services of child, parents, and foster parents				ANI	44	
Item 18: Child/family involvement in case planning				ANI	60	
Item 19: Worker visits with child				ANI	68	
Item 20: Worker visits with parents				ANI	58	
Well Being Outcome 2 - Children receive services to meet their educational needs	Yes	93.8				
Item 21: Educational needs of child				Strength	94	
Well Being Outcome 3 - Children receive services to meet their physical and mental health needs are met	No	66.7				
Item 22: Physical health of child				ANI	77	
Item 23: Mental health of child				ANI	70	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI)

Table 3: Idaho’s Performance on the Six Outcome Measures for Which National Standards Have Been Established

Outcome Measure	National Standard	Idaho Data
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	9.3%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	.57% or less	.40%
Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode?	8.6% or less	11.9%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	88.9%
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	33.6%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	81.1%

Table 4: CFSR Ratings for the Seven Systemic Factors

Systemic Factors	In Substantial Conformity?*	Rating
IV. Statewide Information System	Yes (3)	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
V. Case Review System	No (2)	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		Strength
Item 27: Process for 12-month permanency hearings		Strength
Item 28: Process for seeking TPR in accordance with ASFA		ANI
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
VI. Quality Assurance System	No (2)	
Item 30: Standards to ensure quality services and ensure children’s safety and health		Strength
Item 31: Identifiable QA system that evaluates the quality of services and improvements		ANI
VII. Training	No (2)	
Item 32: Provision of initial staff training		ANI
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		Strength
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		ANI
VIII. Service Array	No (2)	
Item 35: Availability of array of critical services		Strength
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		ANI
IX. Agency Responsiveness to the Community	Yes (4)	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		Strength
Item 40: Coordinates services with other Federal programs		Strength
X. Foster and Adoptive Parent Licensing, Recruitment and Retention	Yes (3)	
Item 41: Standards for foster family and child care institutions		Strength
Item 42: Standards are applied equally to all foster family and child care institutions		Strength
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children’s racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

*Systemic factors are rated on a scale from 1 to 4. A rating of 1 or 2 indicates “Not in Substantial Conformity.” A rating of 3 or 4 indicates Substantial Conformity. ** Individual items may be rated either as a Strength or as an Area Needing Improvement (ANI)