

To:

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

I support the recommendations that have been submitted by the American Public Human Services Association (APSHA)/National Association of Public Human Service Administrators (NAPCWA) for improving the CFSR process. In particular, I want to voice my endorsement of recommendations for a revised set of measures and indicators—question #2 in the request for comments.

2. To what extent should data or measures from national child welfare databases (*e.g.*, the Adoption and Foster Care Analysis and Reporting System, the National Child Abuse and Neglect Data System) be used in a Federal monitoring process and what measures are important for State/Tribal/local accountability?

The use of Principal Components Analysis and Composite Scores should be abandoned, as should fixed National Standards. My colleague John Schuerman and I have detailed the numerous reasons why the CFSR2 approach to measuring permanency and stability is seriously flawed (see <http://www.chapinhall.org/research/report/child-and-family-services-review-composite-scores-accountability-track>). All outcome measures, and whenever possible, process and quality indicators, should come from state SACWIS or SACWIS alternative systems. The data that is submitted to AFCARS and NCANDS is drawn from these state systems. Fully longitudinal data is needed to track outcomes over time. If AFCARS and NCANDS are to be used to track a core set of outcome measures, these systems (especially AFCARS) should be improved so that submissions can be linked together with minimal data loss and maximum accuracy. To that end, it might be helpful to extend the time window between the end of each AFCARS reporting period and the date that the data are due at ACF from 45 days to at least 3 months. An indicator that will allow child welfare and juvenile justice supervised children to be distinguished should be added. In addition, US Census estimates of child populations can be used to add entry rates to any analysis of permanency outcomes. Solid measures of some important child welfare issues (*e.g.*, placement stability) are beyond the scope of AFCARS, even with minimal improvements. Measures should not be compromised so that they can be drawn from AFCARS---good measures that are not available in AFCARS should come directly from state data. Examples of specific measures of safety and permanency are listed in the APHSA/NAPCWA comments, as are key process measures, and some additional indicators that might be a part of a useful quality assurance system. States should be encouraged to use longitudinal administrative data to the extent that they are able, and should be supported to improve their capability, either alone or by joining a voluntary collaboration of states. Other measures (*e.g.*, sibling placements, distance from home to placement, connections to educational, health and mental health systems) should be explored by states and shared in the spirit of continuous quality improvement, not pass/fail scrutiny under a threat of punitive sanctions.

Progress should be judged from performance at a baseline, not by comparison to other jurisdictions.

Thank you for the opportunity to comment, and I look forward to a CFSR3 process that improves on past CFSRs and provides useful information to both states and ACF, as we all work to better serve our most vulnerable children and families.

Best,
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