



Children's Research Center

Advancing Research...Improving Outcomes

MEMORANDUM

to: Federal Register
from: Children's Research Center
subject: May 19, 2011
date: Comments on CFSR Federal Register Notice

The Children's Research Center (CRC) was established to help federal, state, and local child welfare agencies reduce child abuse and neglect by developing decision-support systems and conducting research that improves service delivery to children and families. CRC is a division of the nonprofit National Council on Crime and Delinquency (NCCD), which was established in 1907 to perform a similar role for private and public agencies serving delinquent children. While pursuing these goals, CRC has often worked with states to address issues raised by the Child and Family Services Review (CFSR), and we welcome this opportunity to comment on the process.

While preparing these comments, we reviewed draft comments prepared by the National Association of Public Child Welfare Administrators (NAPCWA) and Chapin Hall ("The Child and Family Services Review Composite Scores: A Critique of Method"). In many key respects, we feel that these two organizations have made several of the points that are crucial in this discussion, and we would like to use our comment to express our agreement on these points and raise one important caution.

In general, we affirm the values and principles expressed in the NAPCWA comment. We lend our particular support to recommendations 1 and 3. We believe that streamlining the planning process by combining the Child and Family Services Plan and annual reporting process with the CFSR would represent an improvement, and we support the proposed changes to the PIP process. Further, we are in substantial agreement with recommendations regarding revised data measures, allowing for a greater accounting for differences among states.

We support the useful suggestions made by Chapin Hall regarding the collection and use of data in the CFSR. Data and analysis used in the reviews should take into consideration the variation among states in terms of populations and caseloads. Measures should be simplified and made more transparent, and we support the creation and use of a truly longitudinal national database.

We also wish, however, to raise one caution. While states have an important role to play in the QA process, we cannot agree to the suggestion to transfer responsibility for measurement from the federal level to the states. Despite states' best efforts, 39 out of 52 jurisdictions have been in substantial conformity for the systemic area of QA. While most states have set acceptable standards for children in foster care as part of the QA area, only 39 have a framework for accurately determining whether these standards are met. Even within this group of 39 states,

there is no guarantee that these states are measuring and assessing consistently. We believe that this demonstrates the value of maintaining measurement at the federal level, which would provide a greater ability to ensure consistency of standards and methods. We support further discussion in this area to find an appropriate compromise that will generate accurate and useful data for evaluation. We would recommend consideration of the role that outside groups might have in this process.