

Thank you for the opportunity to provide suggestions for improvements to the Child and Family Services Review (CFSR) system. Because of my particular interest in data, I will be focusing my comments and suggestions in that area.

## Number 2

Currently, very few data elements are used in the CFSR from the National Child Abuse and Neglect Data System (NCANDS) due to data quality issues, particularly missing data. Far more data are used from the Adoption and Foster Care Analysis and Reporting System (AFCARS) which is a mandated reporting system. Therefore, before expanding the CFSR to incorporate the use of other state administrative data, I urge the Children's Bureau to work to amend the Child Abuse Prevention and Treatment Act to make NCANDS a mandatory system. Regulations should be promulgated which establish, at a minimum, common definitions, data quality standards, and a federal monitoring system. Given the amount of investment that both the states and the federal government have made in NCANDS, it is time to make these changes so that more of these data can be used in the CFSR.

## Number 3

The goal of any changes made to the quantitative data used in the CFSR should be to increase the credibility, consistency, accountability and fairness of those data. Therefore, if the Children's Bureau decides to expand the use of state administrative data beyond those data elements currently used in the CFSR, a comprehensive strategy would need to be employed to meet these goals.

In my experience working with state administrative data systems, the quality of non-AFCARS data elements varies widely both within individual state systems and across states. Whether new measures are developed for all states using these data, or individual states develop their own measures, it is likely that the federal staff will not have direct access to those data for the development or replication of the measures, or to set national standards utilizing those elements.

To mitigate these limitations to the oversight functions and requirements of the federal government, at a minimum, the comprehensive strategy would need to include the following components:

- evaluation of the relevance of the proposed measures to the goals of the CFSR and subsequent approval of the measures by the Children’s Bureau,
- state by state assessment of the quality of the data elements (e.g. missing data, internal consistency, etc.) that would be used in the new measures and their subsequent approval by the Children’s Bureau,
- state by state assessment and approval by the Children’s Bureau of the accuracy of the computer programs that would generate the measures,
- setting of either “high goal” (as currently done) or “minimum” performance standards for the measures,
- certification by the Children’s Bureau of the qualifications of each state staff person who supervises staff or contractors who generate the measures, and
- implementation of an on-going monitoring system to determine whether or not states are following all approved aspects of the measures.

### Other

The recent Information Memorandum issued by the Children’s Bureau regarding services for LGBT youth in the child welfare system sets the stage for needing information about these youth and also information about adults, such as foster and adoptive parents who serve these and other children and youth in the child welfare system in future versions of the CFSR. Because the identification of these groups is a sensitive issue, the Children’s Bureau should support research in a variety of geographic areas reflecting various cultural contexts which identifies the best and most sensitive approaches to identifying these children and adults.

I look forward to having an opportunity to review and comment on your specific proposed changes to the CFSR.

Penelope L. Maza, Ph.D.

Senior Child Welfare Consultant