

To the Children's Bureau:

In response to Question 1: How could ACF best promote and measure continuous quality improvement in child welfare outcomes and the effective functioning of systems that promote positive outcomes for children and families?

Use valid measure to gage performance and change over time. Too many of the CFSR administrative data measures do not provide valid measures of performance and change over time. This includes the placement stability composite measure. Each of the three indicators used in this composite combines children in care different periods of time. Population dynamics affecting the denominator can result in misleading conclusions when the measure is used to assess change over time. This is particularly the case for the third indicator describing children in care over 2 years. When this third indicator is graphed over time, performance in CA looks like it has been dramatically deteriorating since 1998. An alternative measure of placement stability is provided by the Center for Social Services Research at U.C.Berkeley on their publicly available website; this measure does not combine children in care over different periods of time. When this measure is graphed over time, it can be seen that performance on placement stability since 1998 has not been deteriorating for children in care 2, 3, 4 or 5 years in care; in fact, it has been improving. The federal measure is misleading.

The on-site case reviews are also problematic. While a small sample can be representative of a large population, this is only likely to be the case if the sample is randomly drawn. In CA, the 65 cases used for on-site reviews come from three of the 58 counties in the state and thus are not randomly drawn from the state population. Additionally, because not every case is relevant for each indicator assessed in the on-site review, sometime as few as one or two cases have been used to assess a state's performance on an indicator (GAO, 2004). Finally, these on-site reviews are very heavily weighted in the CFSR process. While there may have some changes in the process in the second round, in the first round most of the indicators measured were based upon data from on-site reviews.

Thank you for considering my comments.

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