Overall, I am extremely pleased with the direction that Administration for Children and Families has taken with regard to the CFSR process. Thank you for many major changes that make the Indicators and Standards portion of the process much better than it has been in earlier rounds, and hopefully more useful to state agencies and ultimately the children and families they serve.

1. The elimination of composite scores, use of entry cohorts, reduction of the number of indicators from 17 to 6 are extremely welcome changes from CFSR2. Any additional changes should be adjustments to the suggested indicators, not the addition of more indicators.

2. Some public agency staff are concerned with the recurrence of reports indicator as described, since policy may require screening in multiple reports to ensure safety. While all potential measures of recurrence have issues, a possible alternative might be:
•Of all children who received a screened-in report of maltreatment
during a 12-month period (regardless of disposition type), what percent were reported again with a substantiated report within 12 months from the date of initial report?

3. Does the placement stability indicator count all placement days during the year in the most recent episode or across all episodes during the year? Although the latter may be preferred, can it even be computed using AFCARS?

4. If risk adjustment is used, will states have to enter into a PIP for performance on an indicator where they meet the national standard with their raw score but do not with their risk adjusted score or will the risk adjusted score only be used if it helps a state to meet substantial conformity on an indicator?

5. Suggestions for risk adjustment are:
•Age group for all indicators (at report, at entry, or on first day of year as appropriate)
•Foster care entry rate for the entry rate permanency and the reentry indicators.
•In addition, a dichotomous variable that distinguishes states that include juvenile justice youth in AFCARS from those who do not might be explored.

6. Please provide a more detailed explanation of the methodology proposed for setting goals and thresholds. This section is vague and confusing.
•How will "bootstrapping" be used? If ACF has all of the data for a state, why would just 3 data points be used, and not more of the available data and appropriate statistical techniques?
•It is unusual to use 4 standard deviations as the distance required for improvement (as is the attempt to use Chebyshev's theorem as a justification when all of the actual data are available), and it does raise concerns--since failure to meet goals can result in a large fiscal penalty.
•Was the proposed methodology recommended by the expert panel that ACF convened in 2013? If not, perhaps a group including statistical experts should take another look at the proposed methodology and recommend changes.
•An appropriate methodology may be complex and challenging to explain to non-experts, but should be statistically defensible, with all details made publicly available for those who wish to fully understand the process. Details provided should include the results of some testing with the available data.

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