

To: Miranda Lynch Thomas, Children’s Bureau, Administration on Children, Youth and Families, Administration for Children and Families, 1250 Maryland Avenue SW., 8th Floor, Washington, DC 20024.

From: Joan Smith and Lisa Tuttle, Casey Family Programs

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RE: 45 CFR Part 1355 Statewide Data Indicators and National Standards for Child and Family Services Reviews

Thank you for the opportunity to provide comments regarding the Statewide Data Indicators and National Standards for Child and Family Services Reviews. We welcome the opportunity to partner with your administration, our state partners, and other child welfare stakeholders in working to continually improve outcomes for children.

The field of child welfare has made incredible progress in the past two decades in our accountability to our constituents and in our use of data to drive systemic improvements. Nearly all states have the capacity to collect standard data elements consistently and accurately. Further, the key legislative and administrative priorities of public child welfare agencies are tied to outcomes and data. Technological advancements also make more rigorous measurement possible and enable cross-system collaboration. Casey Family Programs applauds the progress made by states and their leadership in the human services. We also acknowledge that the CFSR process has made a positive contribution to the field and to improved outcomes for children and their families.

In order to facilitate peer learning and technical assistance, Casey Family Programs regularly convenes a group of data and CQI leaders from approximately 20 jurisdictions. Through outreach to this group, and consultation with other partners, we developed the following comments.

Overall, the changes represent a significant improvement from the prior CFSR rounds. In general, the greater use of entry cohorts, fewer measures, and elimination of the composite scores represent useful changes. The majority of concerns are focused on Safety Area 2 and the need for more specific review of methodology regarding thresholds and improvement goals.

Positive Improvements

- The six measures are methodologically sound and the information in the Federal Register reflects thoughtful consideration of agency and stakeholder feedback.
- The elimination of composite scores and the reduction of the number of indicators to 6 are extremely welcome changes from CFSR 2. Any additional changes should be adjustments to the suggested measures, not the addition of new measures.
- Respondents support the use of additional data sources in the assessment of a jurisdiction's performance and in response to PIP requirements
- Simultaneously, the introduction of companion measures maintains the concept of balanced and integrated system measurement.
- The use of an entry cohort avoids methodological concerns from previous rounds and is a positive change made in response to prior feedback.
- We appreciate that the national standard is set at the observed national performance as opposed to the 75th percentile.
- There is general support for risk adjustment

Thresholds, Improvement Goals and Risk Adjustment

While there is general support for the thresholds, improvement goals and risk adjustment, before the proposed methods are finalized, a more detailed and thorough explanation of the thresholds and improvement goals methodology should be provided. In addition, we request and recommend allowing for additional review and comment on these methodologies and a comparison of several potential strategies. A better understanding of the calculations behind the measures is a necessary first step, followed by the provision of examples using actual NCANDS and AFCARS data. Additional suggestions for risk adjustment are: 1) age group for all indicators and 2) foster care entry rate for the entry cohort permanency and reentry indicators. In addition, a dichotomous variable that distinguishes states that include juvenile justice youth from those who do not might be explored.

Data Profiles – Additional Support Recommended

The selection of contextual measures to include in the state data profile was not specifically noted in this Federal Register. However, given that the State Data Profile is the report of record regarding the federal performance measures, it is appropriate that this document be as useful as possible.

- In addition to statewide performance, disaggregated data for the six performance measures (by age, race, and county) would be beneficial for CQI

activities. In addition, a rate of placement (per 1,000 child population) that is not tied to federal performance standards would be necessary for risk adjustment and should be included in the State Data Profile. Along these lines, technical assistance to help jurisdictions develop standardized reporting procedures for each performance area is needed.

Without additional resources, the lack of changes to AFCARS is beneficial for jurisdictions that struggle to implement existing requirements with fidelity. However, the inclusion several key indicators would be beneficial – specifically an indicator of Juvenile Justice case type, and indicators of ICWA eligibility and status.

Detailed Feedback on Individual Measures

Safety Area 1 – Maltreatment in Foster Care

- This measure represents an improvement over the previous methodology, which only counted maltreatment by foster care providers and did not adjust for time in care.
- Use of incident date and lag time (7 days) will improve accuracy – jurisdictions may need support in implementing and reporting an incident date.
- A related concern is the lack of a safety measure specifically related to safety for children who do not enter care. It is noted that tremendous variation in the definition and reporting of in-home cases makes this problematic. Jurisdictions should be encouraged to measure additional items through their own CQI processes, without requiring additional federal outcome measures.

Safety Area 2 – Re-Report of Maltreatment

- This potentially addresses some of the concerns about safety at home – particularly as more jurisdictions consider alternative or additional options to the use of “substantiation” as a marker for safety.
- There is concern that jurisdictions with higher screen in rates (broader definitions of maltreatment) would appear to have poor performance. This concern could potentially be remedied if the numerator of the measure was a substantiated or indicated report within 12 months of the initial report (instead of just a re-report). Another consideration is the inclusion of screen-in rate as an agency-level risk adjustment.
- It was noted that there is no exclusion of re-referrals that occur immediately – which could involve multiple reporters calling with the same concerns. Jurisdictions vary in their policies and practice around the merging of

overlapping investigations (referrals that come in with additional information during an open investigation or DR) Jurisdictions can control this to some extent prior to reporting to NCANDS. It is recommended that reports of maltreatment in which the incident date of the second and subsequent reports occurred on or before the referral date of the first report be excluded (if a jurisdiction provides incident dates.)

Permanency Area 1 - Permanency in 12 Months for Children Entering Foster Care

- There is some concern that this is a truncated view - some jurisdictions that do not achieve permanency within 12 months do see more successful exits to permanency at 24 and 36 months. (It is acknowledged that these later exits would be noted on Permanency Outcome 2) Jurisdictions should be encouraged to supplement the federal measures by including a longer duration and disaggregating by discharge reason without a connection to a federal performance standard.
- This is a measure for which an entry rate and age risk adjustments would be useful.

Permanency Area 2 - Permanency in 12 Months for Children in Foster Care for 2 Years or More

- This measure is impacted by case mix.
- It is effective to use this measure in parallel with the permanency in 12 months to assess performance for longer stayers.

Permanency Area 3 - Re-Entry to Foster Care

- There was some discussion as to the use of an admission cohort rather than counting all children who exited foster care to reunify or live with a relative, regardless of when they entered foster care. The purpose of this focus on current practice is in keeping with the rationale that new interventions may best be monitored in an entry cohort. At the same time, the new measure will not evaluate the effectiveness of post-reunification supports for children who had been in care longer periods of time. Both measures have limitations, but both are acceptable performance measures for this indicator.

Permanency Area 4 - Placement Stability

- There is concern that this indicator counts all placement days during the year across all episodes during the year-- this may not be possible given the current structure of AFCARS, and if so, we recommend that the measure be limited to the most recent episode.



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