

On behalf of the Maryland Department of Human Resources/ Social Services Administration, thank you for the opportunity to review and consider the proposed changes to the CFSR measures. The revised CFSR process offers states increased flexibility and opportunities to assess child welfare practice and outcomes, and we appreciate and support these improvements.

We do, however, have the following concerns with the revised measures:

1. Regarding Safety - Re-Report of Maltreatment: Maryland state law requires that all identifying information regarding screened-in reports with ruled-out allegations/findings be expunged from the SACWIS system at 120 days after case closure. Therefore, full data to match initial and subsequent screened-in reports will not be available from Maryland. How would the Children's Bureau address this issue?
2. Also regarding Safety - Re-Report of Maltreatment: As the purpose of this measure is to assess "whether the agency took the necessary actions to prevent a FUTURE report of maltreatment," we suggest that maltreatment incident date be considered. Meaning: for subsequent screened-in reports in which the maltreatment incident date was PRIOR TO the first screened-in report date, we would suggest that that subsequent screened-in report be excluded from the numerator. Maryland state law requires that a new investigation be opened for any/all new allegations made during a current investigation (even if the abuse/neglect occurred in the past). For example, if new allegations of past sexual abuse are disclosed during a physical abuse investigation, the worker is required to call in those allegations as a new report. If the maltreatment incident date is not considered, the re-report rate for Maryland (and other states with similar laws/practices) would be incorrectly inflated.
3. Will data profiles be provided to all states during all years of CFSR Round 3 (i.e. starting in FFY 2015)? Maryland would request that data profiles be available for all states at the beginning of Round 3, with regular semi-annual/annual updates thereafter, so as to adequately assess baseline data, measure improvements, and prepare for the formal CFSR review.

Thank you for consideration of these comments. Please feel free to contact me with any questions regarding these comments.

Linda Carter, M.Ed.
Manager, Research and Evaluation
Maryland Department of Human Resources/ Social Services Administration