Michigan's Comment: Data Indicators and the Methods for Calculating
Associated National Standards on those Indicators.
May 22, 2014

The Measures Overview:
- 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 six are positive changes. However, Michigan supports additional clarification to safety measure 2 and changes to permanency measure, area one/two with the addition of a measure of permanency within 24 months.

Cohorts: Michigan supports the use of entry cohorts rather than point in time or exit cohorts.

Composites*:*
- Michigan supports the use of individual measures instead of composites.
- Michigan supports the use of companion measures.

Safety Outcome 1: Children Are, First and Foremost, Protected From Abuse and Neglect

Proposed Safety Performance Area 1: Maltreatment in Foster Care
Safety Area 1 Comments:
- Michigan supports this data indicator.
- Michigan supports including all maltreatment types by any perpetrator including parents.
- Use of the incident date and implementing the exclusion of children in foster care less than 8 days and any report that occurs within the first 7 days of removal is supported.

Proposed Safety Performance Area 2: Re-Report of Maltreatment
Safety Area 2 Comments:
- Michigan requests clarification on this data indicator.
- Michigan requests a definition for "screened-in" to determine that states that use the Differential Response system and states that do not use Differential Response have comparable performance outcomes.
- Michigan supports a data indicator to count states' recurrence of high or intensive risk cases, regardless of substantiation, as the basis for determining it ability to prevent maltreatment recurrence, which would be more consistent with research.

CFSR Permanency Outcome 1: Children Have Permanency and Stability in Their Living Situations

- Michigan supports the exclusion of youth age 18 and older even though Michigan provides foster care services to those youth 18-21 that meet specific criteria, as there is no consistent inclusion of this population of youth across states.

Proposed Permanency Performance Area 1: Permanency in 12 Months for Children Entering Foster Care
Permanency Area 1 Comments:
- Although Michigan supports tracking permanency for children in less than 12 months and more than 24 months, we also support tracking permanency for those children who achieve permanency between 12 months and 24 months. Michigan believes this is a gap in the current proposed measures.
- Michigan supports the use of Companion Measures in program improvement plans; permanency in 12 months for children entering foster care and re-entry for foster care and supports being in concert with each other indicator for program improvement purposes.
- This is a measure for which an entry rate and age risk adjustments would be useful.

Proposed Permanency Performance Area 2: Permanency in 12 Months for Children in Foster Care for 2 Years or More
Permanency Area 2 Comments:
- Michigan supports this data indicator.
- This is a measure for which an entry rate and age risk adjustments would be useful.
- Although Michigan supports tracking permanency for children in less than 12 months and more than 24 months, we also support tracking permanency for those children who achieve permanency between 12 months and 24 months. Michigan believes this is a gap in the current proposed measures.

Proposed Permanency Performance Area 3: Re-Entry to Foster Care
Permanency Area 3 Comments:
- Michigan supports this data indicator.
- Michigan supports the Companion Measures; permanency in 12 months for children entering foster care and re-entry for foster care and supports being in concert with each other indicator for program improvement purposes.

Proposed Permanency Performance Area 4: Placement Stability
Permanency Area 4 Comments:
- Michigan supports this data indicator and the changes to how this is measured.