

Statewide Data Indicators and National Standards for Child and Family Services Reviews Response to the Proposed Rule Changes to the Child and Family Service Review Process and Content

One Voice Texas is a health and human services advocacy organization that works on statewide policy and local implementation projects. Thank you on behalf of our membership for the opportunity to comment on the proposed rule changes to the Child and Family Services Review (CFSR) process. Historically, the federal government has played a vital role in guiding state policy and practice through legislation as well as financial incentives. The CFSR encapsulate both of these federal tools and are essential as they act as a quality assurance mechanism for state performance in child welfare. The current proposed changes to the CFSR are a positive step forward, particularly extending the indicator of re-reports to 12 months; however, there are a few points that One Voice Texas would like to submit for consideration:

Examination of indicated and substantiated cases of maltreatment in foster care:

There are two important components which should be included in the measurement of this indicator. The first is whether a report alleging maltreatment of a child in foster care is received. If that report is screened-in or substantiated are important pieces of information; however, a pattern of reports could also provide critical information as to the safety of the environment in which the child is living. Teenagers in foster care and youth who have aged out often report that their allegations were ignored or not thoroughly investigated because they were seen as “troublemakers.”

Another component that should be added to this indicator is child on child maltreatment in foster care. Although it is not advisable, for a number of reasons, to label children as perpetrators, this information needs to somehow be tracked to measure how well states are responding to these incidents.

Permanency in 12 months

The proposed indicator would only include the first episode of entering and exiting foster care, but permanency isn't permanent if the child comes back into care due to a disrupted adoption or disrupted guardianship arrangement with relatives. We recommend that all episodes of return to care within that period be counted as a part of this indicator.

Increase the case sample size:

Although increasing the sample size of the CFSR is not currently up for consideration, it is a serious matter that needs further discussion. 65 cases is not adequate based on the population size nor does it use an appropriate population, which should be children rather than cases. Sample sizes for each state need to be based on the population of children in foster care. For example, in Texas there are approximately 30,000 children in foster care leading to a sample size of approximately 384 children (at a 95% confidence level with $SD = .5$ standard deviation). If the capacity of the Children's Bureau is challenged by this increase in sample size, they should enlist the help of other national organizations, universities within the home state of the child welfare agencies under review etc.

For any questions or more information contact:

Katherine Barillas, Ph.D., Director of Child Welfare Policy
kbarillas@onevoicetexas.org; 713-480-3937