

Comments that follow are in response to the invitation for public comment on the CFSR data indicators and methods proposed in the Federal Register/ Vol. 79, No. 78 / Wednesday, April 23, 2014 / Proposed Rules.

Overall, the data indicators as proposed represent a significant improvement in measurement methodology, when compared to the system of data indicators used in past CFSR rounds. The use of longitudinal entry cohorts as the basis for these indicators is an appropriate technique to use. I find the proposed methods to be methodologically sound and reasonably easy to understand. I am going to focus the remainder of my comments on some areas that I believe deserve more clarification or perhaps revision (or addition to) in the adoption of final measures.

First, I would advocate the addition of three related permanency measures that are aligned and relatively easy to calculate:

1a--1st time entries into foster care per 1000/children in the population.

1b--entries into foster care for reasons of child abuse and neglect per 1000/children in the population.

1c--entries into foster care for reasons OTHER than child abuse and neglect per 1000/children in the population.

I think that these placement entry rates are a needed context for the permanency measures as proposed. I think focussing on 1st time entrants and abuse only and non abuse entry rates will afford valuable local policy context. While I realize that the risk adjustment methodology speaks to adjusting for local policy differences I believe that setting these input indicators out front and transparently will appropriately guide reviews and discussions about program improvement.

Second, I would advocate amending the permanency measures by including a "permanency in 24 months" indicator and/or a "permanency for children in care 12-23 months". I believe that not having these indicators included leaves a significant gap in information.

Third, I would amend the placement stability measure by changing it to reflect "days of care per placement move" to reflect a more positive oriented measure.

Fourth, I would advocate for great care in designing and publishing risk adjusted results. As this is relatively new to the field, perhaps examples that take historical AFCARS data (2009-2012, for example) and prepare the 'raw' and adjusted results for each jurisdiction, along with a diagram that shows the effects of the risk adjustment. Doing this on a 'practice' basis will provide more opportunity for review and understanding. Also, information about the explanatory strength of the risk adjustment model is needed well in advance of publishing the results.

Fifth, the area with the least amount of clarity in the proposed measures was the methods for determination of annual improvement targets. There really was not enough information provided in the proposal for a precise set of feedback. It will be critical to have detailed and thorough explanations on the use of these methods in the actual review process PRIOR to the actual construction /implementation of these techniques in CFSR reviews.

Thank you for the opportunity to provide feedback about the proposed CFSR measures.