

Comments on Proposed Changes to CFSR Measurement

The Data Analytics Group of the Child Welfare Strategy Group of the Annie E. Casey Foundation is pleased to submit the following comments on the proposed changes to measures used in the Child and Family Service Reviews.

Safety Indicator 1: Children are, first and foremost, protected from abuse and neglect

- Proposed Safety Performance Area 1: Maltreatment in foster care
 - The proposed new indicator, rate of victimization per day of foster care, changes the level of measurement from a child to a day in foster care. While this measure may be precise it does not easily relate to the experiences of individual children in foster care. We suggest using outcome measures based upon number of children served.
 - Due to the configuration of the AFCARS data files it is possible that the denominator for the new measure will overestimate the total placement days in a year, and, thus underestimate the rate of maltreatment per day.
 - Instead of equally weighting the experiences of all children in foster care, the new measure gives differential weights depending on time in placement.
- Re-report of maltreatment
 - Changes to this measure are positive. However, since states data systems are different in how child abuse and neglect reports are recorded, it will be necessary for the CB to provide a consistent definition of report with instructions for when you merge reports into one incident. For example, how does the measure treat two reports for the same incident of neglect but reported by 2 different reporters a week apart?

Children have permanency and stability in their living situations

- Permanency in 12 months for children entering foster care
 - We really support the use of entry cohort data to calculate this measure. We are, however, worried that this measure will be affected by the structural problem in AFCARS that limits one record per child for each 6-month A/B file report. When there are 2 spells in a 6-month period, the information about the first spell is incomplete and does not include the discharge reason. Occasionally, an entire spell is hidden when a child's spell begins and ends during the same 6-month period in which another later spell begins.
 - We believe having only 1 measure of permanency is insufficient and suggest also examining permanency within 2 years.
- Reentry to foster care
 - We are concerned that this measure will be impacted by the structural problem in AFCARS. Not all spells are clearly identified. This is the same issue as discussed above under 'Permanency in 12 months for children entering foster care'.
 - Add a measure that examines reentry for children who exited after 1 year.

- Placement stability
 - The proposed new indicator, rate of placement moves per day of foster care, shifts the measure from a child-level measure. This will be more difficult to understand and relate to practice.

General comments:

- The method for calculating PIP benchmarks is complicated and difficult to understand.
- The national standard should be set higher than the current national average. Risk adjusting measures for individual states makes good sense.
- Overall, the measures are more straight forward and will provide a better framework for improvement in the states.
- Consider using rate of entry as a companion contextual measure for permanency within 1 year.
- The proposed new measures are a vast improvement over early measures that relied on exit cohorts and composite scores. However, the measures are still limited by the flawed data set that is used to create the measures. The CB should modify the AFCARS guidelines to produce data better able to support valid outcome measures.