

# STATE OF COLORADO



**Colorado Department of Human Services**

*people who help people*

**OFFICE OF CHILDREN, YOUTH AND FAMILIES**

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John W. Hickenlooper  
Governor

Reggie Bicha  
Executive Director

May 19, 2014

Miranda Lynch Thomas  
Children's Bureau  
Administration on Children, Youth and Families  
1250 Maryland Avenue SW., 8th Floor  
Washington, DC 20024

Re: Comments on Statewide Data Indicators and National Standards for Child and Family Services Review (Federal Register Number: 2014-09001)

Dear Ms. Lynch Thomas:

The Office of Children, Youth and Families (OCYF) within the Colorado Department of Human Services (CDHS) appreciates the opportunity to comment on the Children's Bureau proposal to replace the statewide data indicators and the national standards for the Child and Family Services Reviews (Federal Register Number: 2014-09001). OCYF thanks the Children's Bureau for undertaking this effort and is appreciative of the efforts to make the measures both simpler and easier to understand. OCYF finds the proposed measures to be methodologically sound and we appreciate the new use of entry cohorts as we believe this focus will assist states in more effectively implementing practice changes and observing their associated effects throughout the quality assurance process. Furthermore, we appreciate the elimination of the composite measures and the new focus on a smaller number of measures.

This response outlines OCYF's comments regarding specific data indicators, the connection between risk adjustments, the Program Improvement Plan (PIP) process, and the development of baselines, goals and thresholds.

*Proposed Safety Performance Area 2: Re-Report of Maltreatment*

OCYF is concerned about the definition and measurement of re-referrals as currently articulated within the proposed rules. We raise the question of whether the proposed measure will penalize states twice: once as a result of a parent abusing a child while on a home pass and then again due to the manner in which the abuse is referred for investigation (i.e., the 'Re-Report of Maltreatment' and the 'Maltreatment in Foster Care' measures). Furthermore, the proposed measure raises the possibility that instances where multiple reporters might simultaneously provide a new referral would adversely impact performance on this measure. Accordingly,

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OCYF recommends that, for the purposes of this measure, the Children's Bureau consider excluding re-referrals that involve multiple reports of a similar concern by only counting referrals that are screened-in for assessment.

*Risk Adjustments and Program Improvement Plans*

OCYF supports the decision to incorporate risk adjustment into the hierarchical model used to assess the performance of states as this approach will allow more appropriate comparisons between states. However, the connection between the use of risk adjustments and PIPs is unclear. Will states be required to enter into a PIP for the indicators in which they meet the national standard with their raw scores but do not meet the standard when the risk adjusted score is used? In addition, will states have the opportunity to provide feedback or propose alternatives to the Children's Bureau on the use of risk adjustments that could adversely impact the state's performance? OCYF recommends that the Children's Bureau consider providing further clarification in regard to the use of risk adjustments and their subsequent impact on PIPs.

*Baselines, Goals, and Thresholds*

While OCYF appreciates the decision to establish goals on the basis of a state's past performance, we are concerned about the lack of explicit descriptions on how goals and thresholds will be established. OCYF understands the theoretical rationale and utility of using bootstrap methodologies and hierarchical linear modeling, however, we are concerned about the brevity of the language used to describe and justify these methodologies as well as the anticipated effects from these changes. OCYF recommends that the Children's Bureau consider providing further clarification on how these goals and thresholds will be established, as well as an opportunity for states to provide subsequent feedback on the proposed methodologies.

Thank you for the opportunity to provide comments on this federal register notice. If you have any questions, or would like to discuss our feedback, please feel free to contact me at [robert.werthwein@state.co.us](mailto:robert.werthwein@state.co.us) or at 303-866-4544.

Sincerely,



Robert Werthwein  
Deputy Director  
Office of Children, Youth and Families