

Proposed Safety Performance Area 2: Re-Report of Maltreatment

I am writing this comment as a Public Children Services Agency Executive Director who has also worked a caseworker and supervisor in the field of child welfare. In my opinion, this measure, as proposed, does not effectively capture concerns regarding the recurrence of maltreatment. I certainly understand the need to measure how states do, in fact, ensure the quality of their work in order to prevent children from being re-victimized, however we need to find a better measurement of what we are really trying study. The fact that re-reports is the proposed mechanism in which to capture if a child has continued to be a victim of maltreatment completely confuses me. If there were no findings in a report of maltreatment and another report of maltreatment is received, and again there are no findings, how can that measure recurrence of maltreatment? Even if there were findings in just one of the reports, this does not mean that the child was victimized more than once. Another area of concern with the proposed changes is that of looking at child victims and non-victims equally within the report - if a child was never a victim of either report, how are they re-victimized? I fear that this measure, as written, will lead to agencies changing their screening procedures and the way that they assess other children in the home in order to "look better" to the feds, which could then lead to future maltreatment. I have always had an issue with this standard, as those who work in this field understand that when children are put into a safe environment they often disclose historical abuse. When this historical abuse is then investigated (as it should be), agencies often take a hit on this standard, when in fact they had no involvement, knowledge, nor negligence of this prior maltreatment. Please consider what we are actually trying to measure and how we can effectively get there - there has to be a better way. Thank you for your consideration.