

Overall, the new direction that ACF is taking with round 3 of the CFSR looks very promising.

1. Proposed Safety Performance Area 2: Re-Report of Maltreatment: We are very concerned about this indicator as it is currently written. Agencies often receive multiple reports for one family from different sources for different incidences within a short time period. Specifically, states would be penalized if we receive an additional report before we have even had time (per our response timelines) to respond to the initial report and provide the family with services.

This indicator should be revised to measure more adequately the services provided by agencies to the actual victims of abuse and neglect. The denominator could be all children with a screened-in report of maltreatment in a 12-month period and the numerator the number of children in the denominator that had another substantiated report within 12 months of their initial report.

2. Proposed Permanency Performance Area 1: Permanency in 12 Months for Children Entering Foster Care: This indicator as written does not align with timelines outlined in the Adoption and Safe Families Act; which states that a permanency planning hearing for children in care occur within 12 months of the child's entry into care.

Since the proposed indicator is measuring the number of children discharged to permanency within 12 months of entering foster care, the permanency planning hearings outlined above would need to occur much sooner.

This indicator should be revised to align more closely with the timelines outlined in ASFA. The denominator should be the number of children who enter foster care in a 12-month period and the numerator the number of children in the denominator who discharged to permanency within 15 months of entering foster care.

3. Proposed Permanency Performance Area 2: Re-Entry to Foster Care: This indicator contradicts the theme of Proposed Permanency Performance Area 1: Permanency in 12 Months for Children Entering Foster Care. Permanency Performance Area 1 as currently stated, requires children be discharged to permanency within 12 months. Permanency Performance Area 2 as written penalizes states for children discharged within 12 months who re-enter care. Since states are being encouraged to move children to permanency in Perm Area 1 (ahead of ASFA guidelines), states should not then be penalized for children who come back into care as outlined in Perm Area 2.

Proposed Permanency Performance Area 2 should be revised to coincide with ASFA guidelines. As such, this indicator could be revised so that the denominator is the number of children who entered foster care in a 12-month period who discharged within 15 months to reunification, living with a relative, or guardianship, and the numerator is the number of children in the denominator who re-entered foster care within 12 months of their discharge from foster care.

4. We also have some questions regarding the risk adjusted score process. Can you please clarify if states will be placed on a PIP if their raw score meets the national standard, but the risk adjusted score does not?

Thank you for the opportunity to provide comments. Please feel free to contact me should you have any questions.

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