

In reviewing the proposal it was evident that a significant cohort is not being captured in the proposed data indicators. The proposed indicators look at permanency for children in 12 months or less and at permanency for children that have been in care for more than 2 years but it does not look at those achieving permanency between 12 months and 24 months. This is a significant concern. Due to the timeframes around obtaining TPR, the vast majority of adoptions occur between 12 months and 24 months. By omitting this period the new rule actually may incentivise a delay in adoptions across the country so that the agencies can receive credit under the proposed standards after 24 months but this is not in the best interest of children. Additionally for those states who continue to seek permanency for the children in the most timely manner possible where the adoptions still occur between 12 and 24 months, these states will actually be penalized because they will have had the majority of the children who were easily adoptable removed from the proposed cohort for measurement.