

Regarding Proposed Permanency Performance Area 2: Permanency in 12 Months for Children in Foster Care for 2 Years or More:

By focusing permanency measures on the first 12 months and beyond the 24th month, states that fail to complete the majority of adoptions by 24 months may be rewarded for failure to complete adoptions timely. Further, states that are successful in completing adoptions quickly, will have a more challenging cohort of children to adopt during the newly emphasized time frame.

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

By focusing on reports instead of substantiation, this measure could reward states with narrow screening criteria and/or those that take dependency action more aggressively after an initial call. Narrow call acceptance criteria can leave potential victims of maltreatment untouched by child protection. Overly aggressive initial responses cause unnecessary removal trauma.

Regarding Proposed Safety Performance Area 1: Maltreatment in Foster Care

By focusing on abuse during foster care, the children at greatest risk are not emphasized by the new measures. Children in relative and especially in-home placements are at greatest risk for maltreatment. Therefore, this measure focuses attention on relatively rare events, instead of those that account for the most and severest abuse and neglect. Further, this measure may have the unintended consequence of undermining community trust in foster parents who are anticipated to become only a fraction of the caregiver's responsible.

Regarding State Performance Assessment

The amount of information provided on the risk adjustment process limits stakeholder ability to meaningfully comment on its implications for practice. Will there be another opportunity to comment on this process after variables that will be used are clear, but prior to implementation?

Thank you for the opportunity for comments and questions.

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