

Friday, May 23, 2014: Notice of Statewide Data Indicators and National Standards for Child and Family Services Reviews (CFSR): The Administration for Children and Families (ACF) released a [proposed rule](#) advising the public of the Children's Bureau's plan to replace the statewide data indicators and the methods for calculating associated national standards on those indicators in the Child and Family Services Reviews (CFSRs). The Children's Bureau reviews a state's substantial conformity with Titles IV-B and IV-E of the Social Security Act through the CFSRs, and the statewide data indicators are used to inform the Children's Bureau's determination of a state's substantial conformity relative to certain safety and permanency outcomes. The public is invited to comment on these indicators and methods before their use in CFSRs scheduled for fiscal years 2015 through 2018. Comments are due next **Friday, May 23, 2014.**

Comments

Child and family services are provided by the child welfare system—and by many other agencies that work both separately and in concert with child welfare agencies. The proposed rule essentially ignores this critical dimension of collaborative practice by focusing solely on data from within the child welfare system. Safety and permanency depend significantly on resources provided to the 90% of parents in substantiated cases who either keep children at home—or have those children returned to them from out-of-home care. Many of those resources are controlled from outside the child welfare system, and the CFSR process should track both the conditions that make those external, non-child welfare services necessary and the effectiveness of those services in meeting child and family needs in substantiated cases, as well as those diverted from the system.

There are data indicators—some of which are already collected in AFCARS—which have direct relevance to safety and permanency. These include the presence of parental drug and alcohol use as a reason for removal, which affects a significant percentage of cases. The three attached charts strongly indicate that these indicators are important in child maltreatment and removal, and that states are widely variable in the seriousness with which they document these risk factors.

A threshold question which these proposed changes ignore is whether child welfare indicators should address the underlying causes and correlated risk factors which affect child maltreatment. The single reference in this proposed rule to the seven systemic factors gives no indication of whether more or less attention will be given to these risk factors than in earlier versions of the CFSR and PIP process. Separating consideration of the systemic factors from the statewide data indicators makes it impossible to determine whether these wider factors that affect child and family well-being will be given the consideration in future CFSR processes justified by their magnitude.

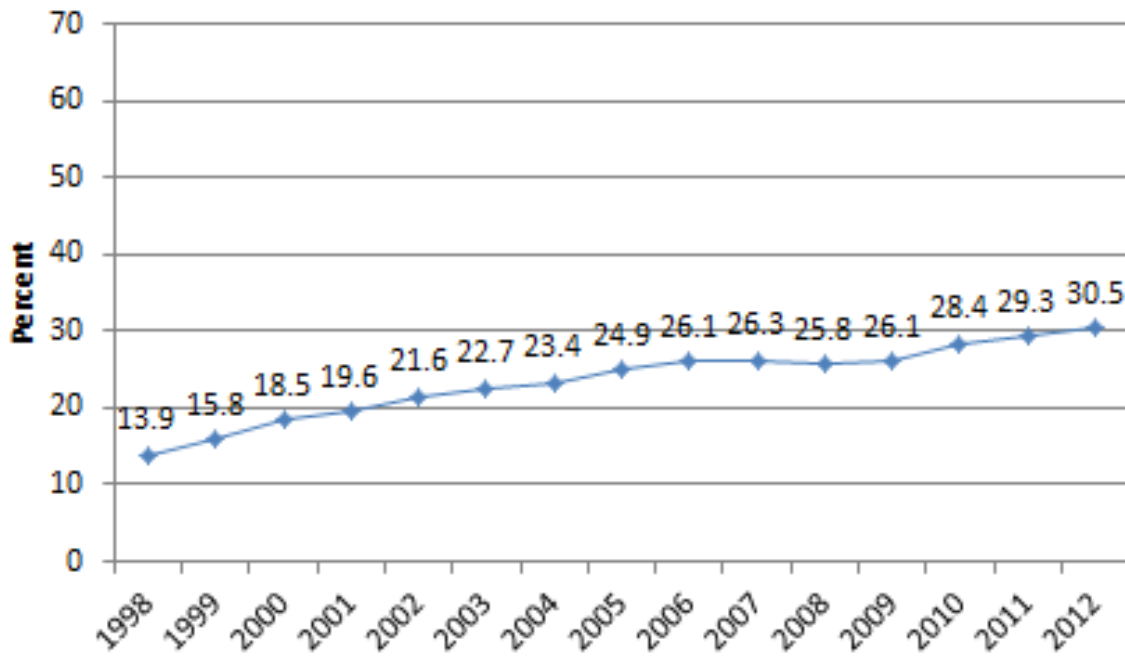
Specific suggestions that would improve the CFSR review process:

1. Require participation from the single state agency responsible for substance abuse treatment in reviewing the array of services.

2. Require specific case review processes that address parents' needs, including trauma-informed co-occurring mental health and substance use disorders.
3. Require a case review process that specifically addresses underlying family issues that are correlated with child abuse and neglect.
4. Specifically review data from substance abuse and mental health agencies on the availability and use of slots by child welfare/court-referred clients and whether such client are identified separately within those agencies so that their outcomes can be compared with other clients' in the aggregate.

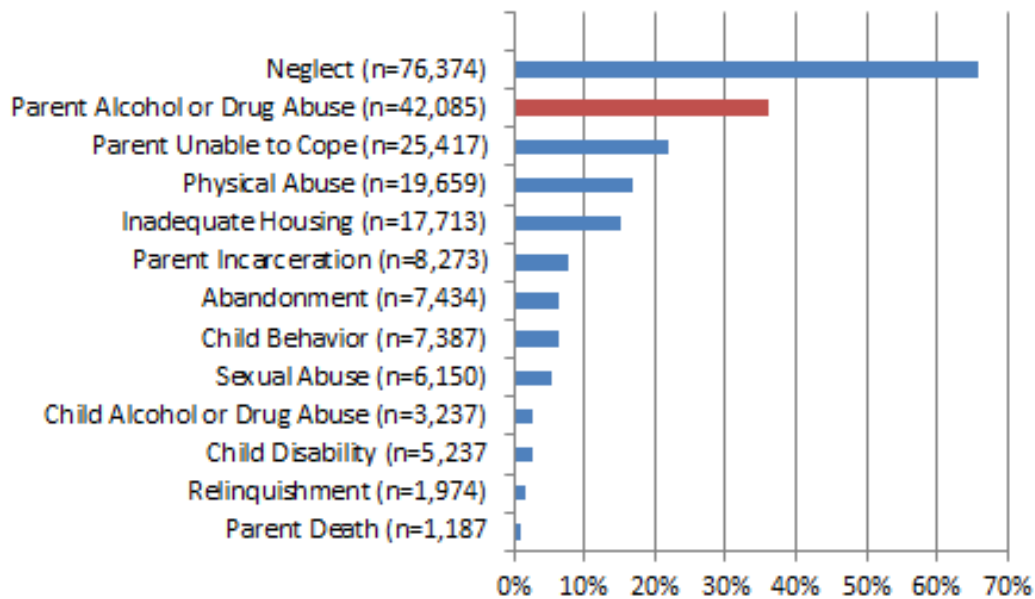
Attached charts

Parental AOD as Reason for Removal in the United States 1998-2012



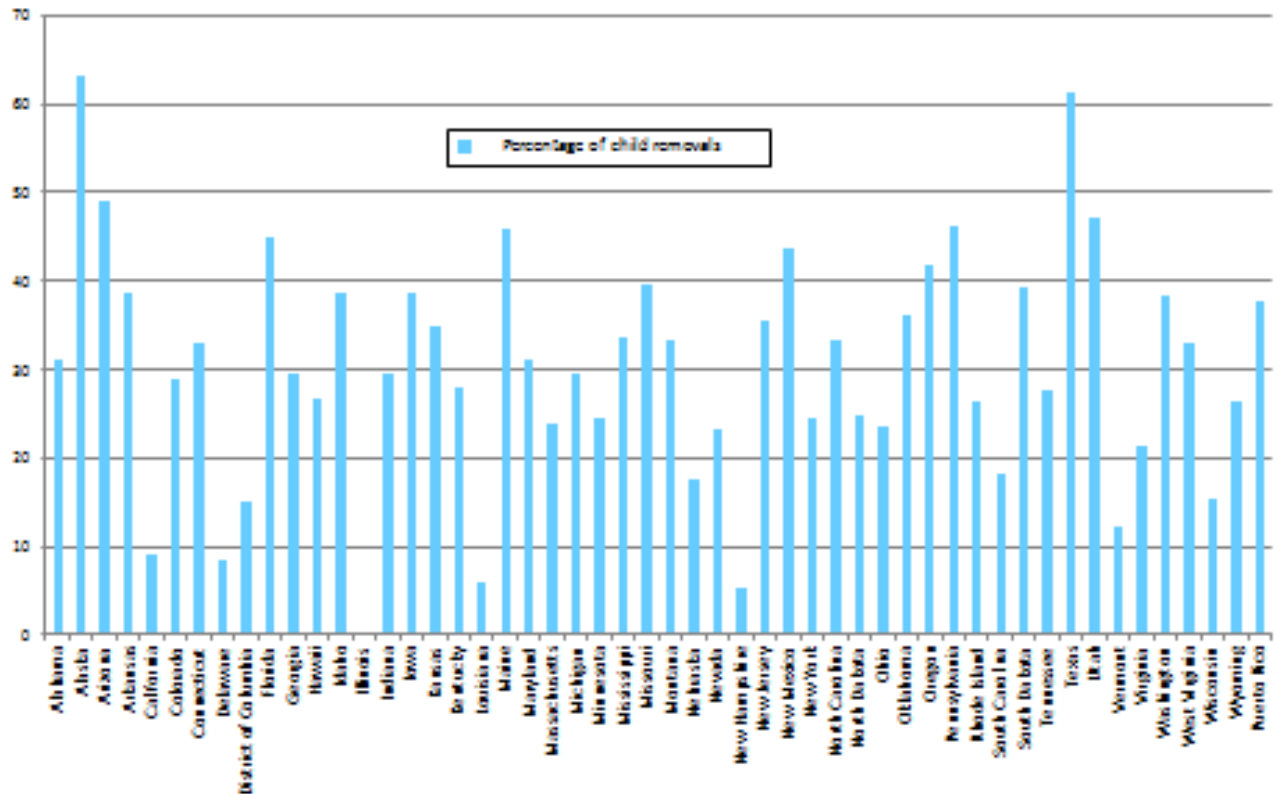
Source: AFCARS

Percent and Number of Children with Terminated Parental Rights by Reason for Removal - 2012



Source: AFCARS

Parental AOD as Reason for Removal 2012



Source: AFCAAS, 2012