

(Part 1) I am greatly heartened by the approach to the Data Indicators in Round Three of the CFSSR. In general, the proposed changes represent considerable progress. I would like to raise some issues that may improve on these proposed changes.

I support the move to entry cohort data as the basis for many of the data indicators. While I know that this represents the best way to see change in our system, my colleagues and I are still in the early stages of knowing best how to use entry cohorts to manage change. I am hopeful that the Training and Technical Assistance available to states and localities will include additional focus on improving our capacity to use these types of measures to their fullest extent. I also appreciate that for some long-staying children, you recognize the need for other cohorts beyond simple entry cohorts. I am in complete agreement that dropping the composite measures is a step forward. Those measures were difficult to interpret and nearly impossible to use locally. With respect to the proposed measures themselves, I will step through each in turn:

Proposed Safety Performance Area 1: Maltreatment in Foster Care. I like standardizing incidents of abuse over the number of days in care, regardless of who is the perpetrator. After all, the purpose of child protection is to keep children safe.

Proposed Safety Performance Area 2: Re-Report of Maltreatment. While I understand all the reasons for this proposed change, it is hard to understand how this is improvement, except in the instance of alternative response States. While that may be an important consideration from the federal perspective, this proposed change has serious shortcomings. On strictly a technical level, the count of re-report requires a second report (referral in Los Angeles) that follows the original report. The re-report must have a disposition. That requirement of a disposition means that jurisdictions that take a long time to reach a disposition may well have an advantage, that is, they may “look” better because a larger proportion of their caseload may still be under investigation and without a determination. States and counties that are diligent in this may well look worse. That would be a dangerous unintended consequence.

On a deeper program level, I understand the intent is to hold the entire child-serving system accountable for outcomes for children, but this proposed measure of re-reporting once again holds Public Child Welfare responsible when it does not have control over the methods for improving the results. It is aspirational on the federal government’s part to expect that Child Welfare is alone responsible to engage other child and family-serving entities (education, drug and alcohol, behavioral health, public health, etc.) to solve these problems. This is an over-reach.

I am also concerned how States and Counties might move to improve performance on this proposed measure if they can’t engage all relevant stakeholders. Under strong budget constraints and negative press, it would be a sad outcome if the “solution” becomes gamesmanship that produces improvement without truly benefitting children and families, e.g., reduced spending on mandated reporter training, increased timelines for reaching disposition, or the elimination of “nuisance” categories of maltreatment (e.g., educational neglect). I think there are potential dangers here.

In the end, if the new proposed measure is promulgated, at the least, keep some version of the existing repeat maltreatment indicator, too, as it is tied more closely to service strategies and actions that Public Child Welfare has control over.

Proposed Permanency Performance Area 1: Permanency in 12 Months for Children Entering Care. I completely agree that the move to a full 12 month cohort is warranted, and the

inclusion of all permanency outcomes is a significant improvement. It is incumbent on the States and Counties to look beneath the indicator to see where it may need to focus attention. The inclusion of all children rather than just first-time entrants is confusing. We have slowly been brought to the understanding that initial entrants move differently than do returning children. As such, the ability to observe changes is enhanced by looking discretely at a cohort of similar children. The technical assistance we've received from the T/TA Network of the Children's Bureau and other consultants is that we could confidently leave re-entering children out of this metric as they accounted for in the re-entry indicator. Now, these children are doubly counted, and it appears to fly in the face of the evidence that we've observed. States and local jurisdictions will need some support in looking at these data. At the least, we will now be forced to instantly disaggregate this federal measure into its constituent parts. The explanation for the Children's Bureau's proposed change seems unclear as to why this is a preferable measure.