

(Part 2): Proposed Permanency Performance Area 2: Permanency in 12 Months for Children in Foster Care for 2 Years of More. This is a strong and useful measure. We concur that it should be continued in Round 3.

Proposed Permanency Performance Area 3: Re-Entry to Foster Care. The change in this area of limiting the focus on re-entry only to the entering cohort of children rather than the cohort of children who left care is understandable, but concerning. We agree that the proposed measure is technically sound and that the effects of practice changes should be observable via this kind of measure, but it does give up the focus on re-entry of children who leave care after 12 months. How will we know how these children fare? With the old measure, States and Counties could look at all children, and then begin their search for root cause by disaggregating the data by length of stay. That approach has shown good results, at least in my experience, and I've not heard sufficiently convincing reasons to give the current measure up. The current measure should be retained.

Proposed Permanency Performance Area 4: Placement Stability. The proposed changes in this measure seem warranted and well explained. Unlike the argument referenced above about moving away from first placements, the reason for focusing on the first year of movement is empirically based (i.e., it's where you note most moves occur), and the move to the rate of placements – controlling for the length of stay – appears eminently sound. We endorse this improved measure.

Other Considerations: Aside for the measures themselves, the discussion about the move to national standards that focus on national observed performance rather than the 75th percentile should serve to focus work on a small and discrete number of areas. This seems a well thought out improvement and should serve to catalyze work in jurisdictions. Rather than doing a little in a lot of areas, we concur that focused work on the most important areas makes eminent sense.

Risk adjustment as a concept makes a lot of sense, but there are not enough details in the Federal Register announcement to help us see how this translates for Los Angeles. More explanation of the details is called for.

The linking of the permanency within 12 months measure with re-entry (companion measures) makes enormous sense, and reflects how Los Angeles has used these two measures in its own work. This is critically important, and we agree with this proposed recommendation.

I appreciate the opportunity to provide comments on these proposed changes. Please take my comments under consideration, but wherever this ends up, congratulations on forward movement on all fronts. Round 3 of the CFSS demonstrates continued leadership of the Children's Bureau. The previous two rounds gave us all a common language and taught us to focus on the use of data. Now, we have all understood the need for continuous quality improvement. This new round, with the improved metrics and related processes, is poised to give us greater local empowerment to own the improvement to our own systems, and to use our federal partners as resources to help us drive positive change for the children and families we serve.

Again, thank you for the opportunity to comment.