

These comments pertain to the recently proposed data indicators and national standards for Child and Family Services Reviews.

Proposed Safety Performance Area 1: Maltreatment in Foster Care

We support use of incident date as it ensures that the incident actually occurred during removal. This is an important distinction because children in foster care may report incidents of maltreatment that occurred prior to the time the child was actually in placement.

We recommend that Children's Bureau evaluate how to define foster care placement to ensure consistency in the measure between states. Some states do not consider those who are placed in relative care to be in foster care. As an example, the definition of foster care should either include all out of home placements or specify that it includes out of home placements where the child is in a non-relative placement or an institutional setting.

Proposed Safety Performance Area 2: Re-report of Maltreatment

Children's Bureau should consider using incident date to ensure that re-reports do not include incidents that actually occurred prior to the initial report to the child welfare agency.

Children's Bureau should also consider having a standard definition of what constitutes a report to ensure consistency among states. Some states combine multiple reports into one assessment whereas others count every call as an individual report. As an example, some states will combine reports into a single report if the allegations and perpetrators are the same even though the report may have two different report sources. Other states may combine reports if they come in during a certain time period. These practices must be consistent in order to compare across states.

Proposed Permanency Performance Area 1: Permanency in 12 months for Children Entering Foster Care

We support breaking permanency for children in foster care into two measures to evaluate the short stay population (more likely to have higher number of reunifications) vs. longer length of stay cases (less likely to reunify). We further support looking at all permanency outcomes instead of placing more emphasis on one particular outcome.

We recommend that Children's Bureau evaluate how to define foster care placement to ensure consistency in the measure between states. Some states do not consider those who are placed in relative care to be in foster care. As an example, the definition of foster care should either include all out of home placements or specify that it includes out of home placements where the child is in a non-relative placement or an institutional setting.

Proposed Permanency Performance Area 2: Permanency in 12 months for Children in Foster Care for 2 years or more

We support breaking permanency for children in foster care into two measures to evaluate the short stay population (more likely to have higher number of reunifications) vs. longer length of stay cases (less likely to reunify). We further support looking at all permanency outcomes instead of placing more emphasis on one particular outcome.

We recommend that Children's Bureau evaluate how to define foster care placement to

ensure consistency in the measure between states. Some states do not consider those who are placed in relative care to be in foster care. As an example, the definition of foster care should either include all out of home placements or specify that it includes out of home placements where the child is in a non-relative placement or an institutional setting.

Proposed Permanency Performance Area 3: Re-entry to Foster Care

We recommend that Children's Bureau evaluate how to define foster care placement to ensure consistency in the measure between states. Some states do not consider those who are placed in relative care to be in foster care. As an example, the definition of foster care should either include all out of home placements or specify that it includes out of home placements where the child is in a non-relative placement or an institutional setting.

Proposed Permanency Performance Area 4: Placement Stability

We recommend that Children's Bureau evaluate how to define foster care placement to ensure consistency in the measure between states. Some states do not consider those who are placed in relative care to be in foster care. As an example, the definition of foster care should either include all out of home placements or specify that it includes out of home placements where the child is in a non-relative placement or an institutional setting.

National Standards:

Risk adjustment needs to be defined more clearly. Children's Bureau should also consider parent factors when considering the Risk Adjustment.