

I have concerns about the Proposed Safety Performance Area 2: Re-report of Maltreatment. While I agree that number and frequency of reports is telling in terms of predicting future risk to children, I have doubts about whether the measure as described accurately reflects the extent to which an agency, state or nation is doing adequate work to prevent recurrence of reports.

This measure does not make allowances for an all too common occurrence. An agency is assessing a CAN report and learns of another CAN incident that meets criteria to be screened in and investigated as well. Also worth notice, the second CAN incident being reported(which will be the re-report) may or may not have occurred prior to CAN report currently under assessment/investigation. Since this really is a common occurrence, perhaps it would be beneficial to exclude the first 30-45 days post the screening in of a the initial CAN report, as the agency has not truly had an opportunity to intervene sufficiently to reduce risk or prevent re-report. Perhaps the measure could look for the percentage of children subject to screened in CAN reports who were subject of a second screened in CAN report within the next 45-365 days of the initial screened in CAN report.

Because there is often not a good way to put a specific date or time parameter on an incident of CAN, there is a temptation to use report recidivism as a proxy measure for CPS quality of service. However, the percentage of children who experience re-report could just as easily represent a screening problem rather than inadequacy of service in terms of preventing re-report. More dangerously, this measure is one that is directly impacted by screening decisions. Theoretically, staff could be trained to screen with this measure in mind, which could lead to decisions to screen out reports that they might have otherwise screened in. This would not be in the best interests of children.

I also have a concern regarding Proposed Safety Area 1: Maltreatment in Foster Care. We have done mock reports to ascertain how our agency would perform . In doing so, I have noted that many of the children who present as maltreated while in our agency's custody appear so because the CAN report that led to their removal from the home was screened in on the same day as their removal. Special care must be taken to make the data requirements such that these children do not appear to be children maltreated while in foster care. Currently, while our intake screening decision is a datetime field, date and time are not required for entry of a journal entry that would signify the beginning of a custody episode.