

Response and questions from the State of Nebraska to proposed CFSR Round 3 indicators. In Nebraska it is standard procedure for courts to physically place some children back with their parents and have DHHS retain legal custody for a period of time. Trial home visits (THV), means the youth is in the State's legal custody and are placed with the parent, are common in Nebraska. Nebraska currently has more than 500 youth on THV, whose duration can range from 30 days to 12 months or more. These youth are included in our AFCARS count as well as in our Required Contacts measure. Given this information, we have the following three comments.

Permanency Outcome, Permanency in 12 months for children entering foster care

a)The CFSR Round 2 Reunification measure contains a 'Trial Home Visit Adjustment' for children who have been on a trial home visit for more than 30 days and subsequently discharged to Reunification. This adjustment sets the discharge date at the date the youth was placed at home on the THV + 30days. Nebraska would like for the 'Trial Home Visit Adjustment' to be included in the 'Permanency in 12 Months for Children Entering Foster Care' measure for the children who exit to Reunification.

CFSR Item 4, Placement Stability

a)Nebraska would like to request that the days youth are placed in a THV be included in the denominator of the Placement Stability days in foster care indicator.

CFSR Safety Outcome 1, Maltreatment in foster care

a)Nebraska would like to request that the days youth are placed in a THV be included in the denominator of the Maltreatment in Foster Care indicator.

Entry Cohort Methodology/Baseline

a)At the 4/28/2014 meeting you spoke about making statistical adjustments to State's scores based on various macro measures, e.g., poverty levels. If this is the case, Nebraska envisions some difficulty with us reporting our scores by five service areas, which are each a large geographic area within the state. We encourage you to establish these statistical adjustments in a manner such that Nebraska can continue to provide results for each of the six federal indicators stratified by each of the service areas in Nebraska, including the adjustment.

Re-report of maltreatment & Maltreatment in Foster Care

a)Nebraska is interested in knowing if an analysis has been completed at the Federal level to assess each state's definition of accepted for investigation. Our interest is that each state may have different policy definitions, thus the rate of re-report/maltreatment recurrence may differ from state-to-state due to disparity in definition of accepted for intake. If an analysis has been performed, will the Federal goal for each state take this disparity into account?