

**State of New Mexico**  
**CHILDREN, YOUTH and FAMILIES DEPARTMENT**

**SUSANA MARTINEZ**  
GOVERNOR

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**YOLANDA BERUMEN-DEINES**  
CABINET SECRETARY

**JENNIFER PADGETT**  
DEPUTY CABINET SECRETARY

May 5, 2014

Miranda Lynch Thomas  
Children's Bureau  
Administration on Children & Families  
1250 Maryland Avenue, SW 8th Floor  
Washington, DC 20024

RE: Comments on CFSR Data Indicators & National Standards Federal Register Notice [FR Doc. 2014-09001]

Dear Ms. Lynch Thomas:

Following is New Mexico (NM) Children, Youth & Families Department's (CYFD) response to CFSR Data Indicators & National Standards Federal Register Notice [FR Doc. 2014-09001]. This response outlines CYFD's responses to areas of concern only, as explained in the previously mentioned federal register.

*Proposed Safety Performance Area 2: Re-report of Maltreatment*

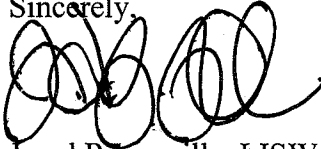
CYFD is concerned that states will differ in the definition of a screened in report, and how a new report is created or assigned. If a new report is received and information is added to an existing case then this information is not likely to be captured/counted as repeat maltreatment. States that do not create a new report are likely to have a lower incidence of repeat maltreatment. The data indicator does not include the efforts to prevent the re-occurrence of maltreatment as indicated in the justification for inclusion of the indicator. CYFD recommends that the Children's Bureau consider including both the re-reporting and the recurrence of substantiated maltreatment to provide a more complete representation of a state's performance in this area.

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

While the data indicator expands the set of permanency outcomes being measured, the indicator does not account for differences in the number of plans which are subsidized by the state and those that are not. For example, states that subsidize guardianships or kinship placements are likely to achieve outcomes in shorter time frames.

Thank you for the opportunity to provide comments on this federal register notice. Should you have any questions please feel free to contact me at [jared.rounville@state.nm.us](mailto:jared.rounville@state.nm.us), or at 505-827-8400.

Sincerely,

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

Jared Rounville, LISW  
Director