

Pennsylvania's comments on the proposed rules on 45 CFR Part 1355, Statewide Data Indicators and National Standards for Child and Family Services Review.

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Overall Changes

Overall, Pennsylvania supports the changes to the Statewide Data Indicators and National Standards for the Child and Family Services Review (CFSR). Specifically, we agree with the use of prospective cohorts rather than exit or point in time cohorts, which provides a more complete assessment of a state's performance and more recent practice changes that may affect that performance. PA also agrees with the change from the use of composite measures to companion measures. PA has historically looked at length of time to permanency in conjunction with re-entry rates to gauge overall performance in permanency outcomes.

Proposed Safety Performance Area 1: Maltreatment in Foster Care

PA supports the changes to how this measure is calculated and welcomes the ability to use incident dates to determine when the abuse occurred. Use of incident dates is a more accurate method than relying on oral report dates in determining when abuse occurred in relation to other case events.

Proposed Safety Performance Area 2: Re-Report of Maltreatment

Although PA agrees with the change from re-reports of substantiated incidents of abuse to re-reports of reports of abuse, we will need to further evaluate how reports of suspected child abuse are maintained in the state and how expunction requirements may impact our ability to report on this indicator given the 12-month timeframe.

PA will also be determining how to include General Protective Services (GPS) reports in the NCANDS file. Recent changes in legislation allow the state to collect GPS reports as well as child abuse reports beginning in January 2015. In addition, legislation has expanded the definition of child abuse, which may result in a perceived increase in PA's numbers and a perceived change in performance from previous years' data.

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

PA supports having all permanency outcomes included in this measure and the use of entry cohorts. PA has included guardianship in its internal measures for many years and views this as a viable permanency option for children.

Proposed Permanency Performance Area 2: Permanency in 12 Months for Children in Foster Care for 2 Years or More

PA supports this indicator to measure children who have been in foster care for long periods of time. States should be working on finding permanent homes for these children.

PA is concerned that there may be a gap in measuring permanency by not including a measure for children in care between 12 and 24 months. We recommend including this timeframe in the state's data profile even if it is not used as an indicator for the CFSR.

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

PA supports this measure and its use as a companion measure to Permanency 1. In addition we support the use of a cohort for this indicator.

PA would like clarification on which record will be used if a child has two removal episodes with a 12 month period. If the first episode is used and the child re-enters within the 12 month period will the discharged reason be assumed to be one of the permanency ones, similar to the current indicator for re-entry?

Proposed Permanency Performance Area 4: Placement Stability

PA supports the use of rates of placement moves based on total number of days in care. This is a better measure of overall placement stability than counting the number of children with 2 or fewer placement moves.

National Standards

PA believes the use of national observed performance as benchmarks for state performance is an improvement over the use of composite measure in the last CFSR. Including risk adjustments to account for factors beyond a state's control adds a level of fairness to the indicators.

This method is, however, a complex one and will require finding a way to explain it in simple terms to state officials and the public. PA recommends looking at the following factors when considering risk adjustments: child's age, child's sex, number of removals, and removal reason.

Data Quality

PA would like ACF to provide clarification on the exclusion of state files or records from establishment of the national standards and risk adjustments. While we understand the need to ensure the national standards are developed using quality data, we would like to understand the potential impacts of excluding a state's data files and whether this

puts a state at a disadvantage when calculating that state's observed or risk adjusted performance. We would also like clarification on how ACF determines if a state has included at least 10% of its AFCARS records in the NCANDS file.

Program Improvement Plan Baselines and Goals

Similar to the National Standards methodology, the method proposed to determine a state's baseline and goals for the PIP may be difficult for many to understand. Despite that, PA does support the methodology and agrees with establishing minimum and maximum improvement factors.