

#### General:

As this type of exercise, by its very nature, tends to focus on problems and concerns, it is important to note that the proposed new data indicators are a significant improvement over the round 1 and round 2 indicators. These questions and comments should not overshadow the overall appreciation for the work that has been done and the improvements that have been made.

#### Re-report of Maltreatment:

1. Consider risk adjusting for the average length of time it takes to complete an abuse/neglect investigation. If a "new" report is received during an active investigation, the new maltreatment is likely going to be appended or linked to the existing report, and not reported to NCANDS as a separate report. While the 12 month follow-up period begins with the initial report received date, a state is not likely to submit to NCANDS a new allegation of abuse as a new report until after the initial investigation is closed, thereby effectively shrinking the window to which a state is exposed on this measure to the period of time between the initial report received completion date and 12 months after the initial report received date.

Therefore, states that have a shorter average length of time to complete an investigation are "exposed" to a potential re-report for a longer period of time.

2. It is unclear if the re-report of maltreatment includes in the denominator all children in a report, or just those "with at least one screened-in report of alleged maltreatment in a 12-month period?" In other words, are children whose Maltreatment Type is "No Alleged Maltreatment" in the NCANDS report included or excluded from the denominator? Without compelling evidence as to why these children should be included, we would recommend that they are excluded.

#### Permanency

1. There are general concerns about not including a measure that tracks permanency between 12 and 24 months. Many children achieve permanency during the 12 – 24 month period in foster care. In Florida, approximately 50% of children removed achieve permanency in 12 months, and 50% of the remainder in 24 months. States that perform well in achieving permanency within 24 months may be unintentionally "punished" because, as a result, they have a post 24 month population which will have a more difficult time achieving permanency.

2. What is the follow up period for placement stability? Is it all placement days for all children who entered care during a 12 month period for up to 12 months after initial removal? Or is it all placement days during the 12 month period for children whose initial removal was during that 12 month period. i.e., If the 12 month entry period is 10/1/01 – 9/30/02; for the child who is removed on 9/21/02 and discharged on 10/27/03, are only the placement moves and days through the end of the entry period counted (9, days: 9/21/02 – 9/30/02), or are the placement moves and placement days during the 12 months following the removal date counted (365 days: 9/21/02 – 9/20/03)?

#### Recurrence of Maltreatment and Placement moves per 1,000 Days in Foster Care:

Both of these measures require an accurate count of all foster care episodes and resulting days in foster care during the report period. This is something that the current AFCARS data file lacks the ability to do. How does the methodology account for this deficiency when calculating performance on these measures?