

Thank you for the opportunity to comment. I like the flow of the measures; however, am a little concerned that there are no permanency indicators for children in out-of-home care 12 - 24 months. The prior adoptions in 24 months had been eliminated. Omitting this population could have an unintended consequence of having states 'hold' adoptions or other permanency options if after 12 months to be after 24 months to be more successful in the next indicator.

I think using the days as the demoninator for placement stability and subsequent abuse in foster care is an interesting concept and I realize how it controls for the length of time children are in care 'vulnerable' to the outcome, but I also think it is a bit confusing to explain to stakeholders.