

The proposed statewide indicators generally represent a significant improvement over both previous sets of statewide indicators. Because they tend to reflect the intent of the measurements more accurately, efforts to conform to them are more likely to have the desired impact. In addition, because they are more intuitive, agencies are more apt to understand how to conform to them and thus to achieve the appropriate outcomes.

While this is generally true of the proposed statewide indicators, there are two which move in the opposite direction, i.e., they provide indicators which less accurately reflect what they should be measuring than did the previous indicators. Moreover, they do so from two different directions, one measuring too much and the other not enough.

The proposal to replace the statewide indicator of recurring maltreatment with one measuring re-reports, regardless of disposition, is wrong for at least three reasons. First, it is inconsistent with the measure related to maltreatment of foster children. States are being told that their job in relation to the general population is not to prevent repeat instances of child maltreatment but rather to prevent repeat reporting of child maltreatment, while they are simultaneously being told that their job in relation to the foster care population is to prevent maltreatment, not the reporting of maltreatment. Second, with more than two-thirds of all reports not substantiated, states are being asked to intervene in families where it is doubtful that any maltreatment occurred or where it is even clear that no maltreatment occurred. To make the latter point even clearer, this measure will penalize states for repeat reports that are due to disgruntled neighbors or ex-spouses, situations where child welfare agencies need not spend their resources. Finally, this measure will generate better scores for those agencies which screen out reports due to workload concerns.

While the indicator related to repeat reports demands that states take action where it is not needed, the one related to re-entry simply ignores much of the relevant population. Because it focuses only on children who have achieved permanency within one year, it suggests that child welfare agencies should be less concerned when a child who returned home in 13 months re-enters care than when a child who returned home in 11 months does so. The proposed measure is undoubtedly a purer measure of timely permanency, but it serves better as part of an analysis of re-entries than of states' success in making permanency permanent for the entire population. The proposed indicator should be generated by the states or the federal government, but it should be used to understand the extent to which states are simultaneously successful at achieving both timeliness and stability in relation to permanency, rather than ignoring the stability of permanency for children whose permanency was not achieved in a timely way.