



# Public Comment Summary and Response

---

Department of Children and Families Annual  
Report

AUGUST 2024  
THE COMMONWEALTH OF MASSACHUSETTS  
MARIA Z. MOSSAIDES, DIRECTOR

## Contents

About the Office of the Child Advocate .....	3
Guide to Acronyms .....	3
Executive Summary.....	4
Introduction .....	6
Public Comments & Response .....	8
Improving Context Provided in the Report.....	8
Improving the Structure of the Report .....	10
Adding Metrics to the Report .....	11
Feasibility Assessment of Respondent-Submitted Research Questions.....	29
Recommendations from the OCA .....	32
Conclusion.....	34
Appendix .....	35

## About the Office of the Child Advocate

The [Office of the Child Advocate \(OCA\)](#) is an independent executive branch agency with oversight and ombudsperson responsibilities, established by the Massachusetts Legislature in 2008. The OCA's mission is to ensure that children receive appropriate, timely, and quality state services, with a particular focus on ensuring that the Commonwealth's most vulnerable and at-risk children have the opportunity to thrive. Through collaboration with public and private stakeholders, the OCA identifies gaps in state services and recommends improvements in policy, practice, regulation, and/or law. The OCA also serves as a resource for families who are receiving, or are eligible to receive, services from the Commonwealth.

## Guide to Acronyms

Acronym	Definition
<b>ABLE</b>	Achieving a Better Life Experience
<b>AFCARS</b>	Adoption and Foster Care Analysis and Reporting System
<b>CFSR</b>	Child and Family Services Reviews
<b>DCF</b>	Department of Children and Families
<b>DWG</b>	Data Work Group
<b>DESE</b>	Department of Elementary and Secondary Education
<b>EOHHS</b>	Executive Office of Health and Human Services
<b>FFPSA</b>	Family First Prevention Services Act
<b>SOGIE</b>	Sexual Orientation, Gender Identity and Expression
<b>TAY</b>	Transition-Aged Youth

## Executive Summary

In December 2022, a Data Work Group (DWG) co-chaired by the Department of Children and Families (DCF) and the Office of the Child Advocate (OCA) released their [final report](#) based on a multi-year analysis of ways to streamline and improve reporting by DCF. The [Department of Children and Families FY22<sup>1</sup> Annual Report](#) reflects the changes recommended in the DWG's final report. To ensure the redesigned report accomplishes the goals set before the DWG, the OCA issued a request for public comment in June of 2023. The [public comment request](#) guided members of the public to submit written comments about the utility of the FY22 Annual Report and the extent to which the redesign meets the needs of respondents.

The OCA received seven responses to the call for public comments. Those respondents acknowledge the improvements made in the DCF annual report and state that more of the data they are looking for is now available. They also provided feedback and insight about additional data, context, and analysis that they believe would improve the utility of the DCF annual report. Those improvements most frequently relate to reporting on education, neglect allegation subclassifications, consumer characteristics, budget revenue and expenditures, decision making, placements, and service provision. In particular, respondents are looking for improvements and additions to stratifications by identity characteristics (such as race, ethnicity, and gender identity).

In total, respondents requested an additional 152 metrics, submitted 20 research questions related to their work, and provided numerous examples of additional narratives, explanations, and definitions, that, if addressed, would better serve their needs.

In collaboration with DCF, the OCA reviewed each response, organized the requests and feedback, then conducted a feasibility assessment. The assessment showed that several of the requests are now feasible using the new [Child Protective Services Dashboard](#), which launched in July of 2023, or through sources such as the [Foster Care Review](#) Annual Report and [National Youth In Transition Data Set](#). It also found that many requests are currently being considered by DCF, while others need additional information, clarity, or pose data quality or privacy concerns. Overall, the assessment found that while the new annual report structure is more complete, there is still more that can and should be done to ensure child protective services data are as transparent, robust, and user-friendly as possible.

Based on the review, the OCA makes the following five priority recommendations:

- DCF, the Department of Elementary and Secondary Education (DESE), and the OCA should develop a strategy for making information on educational outcomes for DCF-involved children more accessible and robust

---

<sup>1</sup> Fiscal Year 22 took place from July 1st, 2021, through June 30<sup>th</sup>, 2022.

- DCF should define subcategories for neglect and work to build more nuanced neglect reporting into the DCF data structure
- DCF should add additional data metrics to the annual report where feasible, especially related to mandated reporting and Transition Age Youth (TAY)
- DCF should continue to conduct an annual review to determine if metrics with data quality concerns have improved enough to be considered for reporting
- The Legislature should ensure DCF and the Executive Office of Health and Human Services Information Technology team that supports DCF are adequately staffed and funded to produce highly contextualized and robust data reports

Respondents and the OCA acknowledge that addressing everything described in the comments would take time and that a staggered improvement approach would accomplish more in the long run.

## Introduction

From 2018 to 2022, the Office of the Child Advocate (OCA) and the Department of Children and Families (DCF) co-chaired a Child Welfare Data Work Group (DWG). The legislatively mandated group<sup>2</sup> set out to review DCF's mandated reports, make recommendations for eliminating unnecessary reports, and design a new report(s) that appropriately and adequately presents data, progress, and key outcome measures about DCF's work. The measures were to reflect the status and demographics of the caseload of DCF, progress in achieving child welfare goals, the status of proceedings in the juvenile court department that involve children<sup>3</sup> in the department's caseload and the status of children who are or have been involved in both the child welfare and juvenile justice systems.<sup>4</sup>

Recommendations for a redesigned annual report were released in the [DWG's final report](#) in December 2022. [The Department of Children and Families FY22 Annual Report](#) reflects those recommended changes. To ensure the redesigned report accomplishes the goals set before the DWG, and identify other potential areas for continuous quality improvement, the OCA issued a request for public comment in June of 2023. The [public comment request](#) guided members of the public to submit written comments via email or paper mail to the Office of the Child Advocate addressing some or all of the following questions:

- Does the report answer critical questions you may have on DCF operations, including the profiles of the children and families served by DCF? Are there additional questions you have about DCF operations that could be answered by data, and if so, what are those questions?
- Does the report answer critical questions you may have about the extent to which DCF is meeting its state and federally mandated statutory obligations? Are there additional questions you have about that could be answered by data, and if so, what are those questions?
- Does the report answer critical questions you may have about the outcomes of the work of DCF? Are there additional questions you have that could be answered by data, and if so, what are they?
- Is data in the FY22 annual DCF report presented in a way that allows you to conduct research or sufficiently understand an issue? If not, what changes in the presentation would be helpful?
- What policy/research questions or concerns do you plan to address using the data in this report?

---

<sup>2</sup> Section 129 and 152 of Chapter 47 of the Acts of 2017

<sup>3</sup> For the purposes of this report, child refers to anyone under the age of 18.

<sup>4</sup> <https://malegislature.gov/Laws/SessionLaws/Acts/2017/Chapter47>

The OCA received seven responses from the following individuals and organizations:

- Children’s League of Massachusetts
- Citizen for Juvenile Justice
- Committee for Public Counsel Services
- Disability Law Center
- HopeWell
- Massachusetts Law Reform Institute
- Massachusetts Law Reform Institute,  
Virginia Benzan

The responses provide feedback and insight on additional context, stratifications, formatting, and metrics that respondents believe would improve the utility of the DCF annual report. The following is a summary of those recommendations and feedback; these are the opinions of the respondents and do not necessarily reflect the opinions or recommendations of the OCA.

## Public Comments & Response

Respondents acknowledge the improvements made in the DCF annual report and state that more of the data they are looking for is now available. They also recognize the depth and breadth of the data they are requesting, acknowledging that no one report could satisfactorily address all DCF-related data needs—an issue frequently discussed by DWG members. To that point, respondents suggest considering the

---

*“The [redesigned] annual report does a more thorough job of covering Child and Family Service Review and child welfare outcome items in the areas of safety and permanency”*

---

development of special reports that relate to education and children in placement, transition aged youth, and LGBTQIA+ youth. Respondents also acknowledge that addressing everything in their comments would take time and that perhaps a staggered improvement approach would accomplish more in the long run.

With those acknowledgements, respondents request contextual, structural, and content changes they feel would support respondents’ ability to understand the status and demographics of the DCF caseload and progress in achieving child welfare goals.

### Improving Context Provided in the Report

Additional context that respondents report would improve their ability to think critically, understand DCF’s reporting, and supplement DCF’s reporting with other sources of data include alignment with federal reporting, clearer key-term definitions, and methodology descriptions. As advocates for the human service workforce and families, respondents say additional analysis, narratives, and more transparent framing would improve their ability to understand the challenges, barriers, and needs of the service provider and consumer populations.

In terms of alignment with federal reporting, respondents discuss challenges with comparing the DCF reported metrics with other sources of data, particularly federally reported data as presented by Child Trends. Respondents request that DCF leverage the same definitions and timelines required for federal reports.<sup>5</sup> If that is not feasible, respondents request that DCF explain any differences between the annual report and what is reported to the federal government.

Respondents also point to a few definitions that, if included, would improve their ability to interpret data and compare it with other data sources. In particular, respondents request definitions for the following terms that appear in the revised DCF annual report:

- kin and the criteria they must meet to provide care;

---

<sup>5</sup> Child Trends is a national organization funded by various federal government sources such as the U.S. Departments of Health and Human Services, Labor, Education, and others. They conduct nonpartisan research to inform public policies, build the evidence base for what works, and mine data to identify young people who are overlooked or ill served by public systems.



- family reunification;
- stabilized intact family;
- federal permanency standards and criteria for non-compliance with those standards;
- and children who entered care in the last 12 months, particularly whether that includes children in care for more than 12 months.

Methodologically, respondents seek clarification about how attendance rates are calculated, a standardized age range distribution throughout the entire report, and more information and reporting on how characteristics such as race, ethnicity, and gender identity are gathered. They also request that DCF develop aims and benchmarks for key metrics and provide an explanation for how those benchmarks are determined.

Similarly, respondents express concerns about missing contextual information. In particular, they request information about any changes in policies or practice that occurred in a fiscal year, especially if those changes could explain variations in data. They would like to know about plans, needs, or challenges the department and their service provider network face in improving metrics that are moving in the “wrong” direction or are not improving. Finally, they request deeper analysis of the inequities and disparities seen in demographic data in a way that attempts to explain why these disparities or trends exist and what can or should be done about them.

Respondents also express concerns with how data are interpreted or framed and urge DCF to acknowledge not just progress that is made, but how far we have yet to go, where progress has slowed or reversed, and when data indicate changes in trends. According to respondents, this is particularly salient for permanency data, including time in placement, placement stability, reunification, and educational attainment. One respondent also cautions DCF regarding qualitative descriptions of data, citing an example that the word “some” was used to describe the 46% of 51As<sup>6</sup> that are screened out.

#### **Narratives that Respondents Wish Were Included in the FY22 Annual Report**

- Describe the time in placement target, what direction the data are going in, and what is being done to meet the target
- Address the fact that placement stability rates improved each year from FY2018 to FY2021, then worsened in FY2022
- Address the year over year increase in length of time until reunification
- Compare foster youth educational outcomes with that of the general population
- Explain why and how the “substantiated concern” category was created and how it is implemented

<sup>6</sup> A 51A is a report of suspected abuse and/or neglect that is submitted to DCF in compliance with [M.G.L. c. 119 § 51A](#).

## Improving the Structure of the Report

The most consistently requested changes relate to the structure and stratification of data. Across the board, respondents request identity characteristics stratifications such as race and ethnicity, LGBTQIA+ status, disability status, and age for additional types of data. Greater nuance in stratifications, such as by each year of life rather than age grouping, and for subclassification of neglect allegations were also suggested. They also request service delivery stratification by transition age youth, case disposition, response determination funding source, family income and other risk factors, and time in placement.<sup>7</sup>

Respondents generally acknowledge that these stratifications and presentations are not feasible in a static report. They anticipate that a data visualization tool would improve utility of the report, helping them more easily accomplish their complex stratification needs and toggling between counts and rates for any given metric. Thankfully, DCF released an [interactive data dashboard](#) in July of 2023. This dashboard seems to address many of the stratification, cross-tabulation, and presentation needs received during the public comment period.

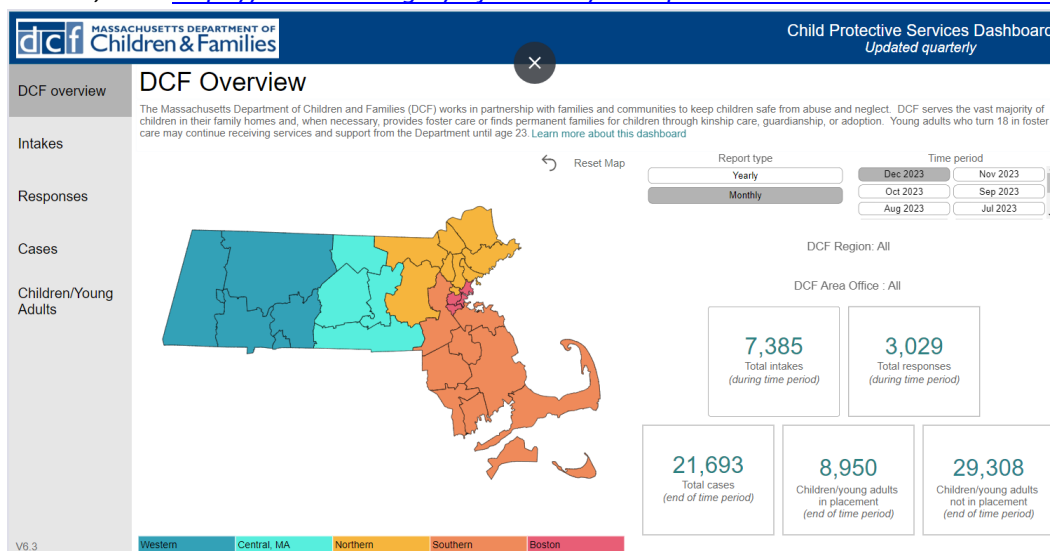
As for the static report, respondents encourage DCF to always include the table/figure number and/or the page number of data referenced in a narrative and to include both counts and percentages for all metrics.

### Stratification Requests:

- Age
- Case Disposition
- Demographic & Identity Characteristics
- Family Income & Indigency Standards
- Funding Source
- Geography
- Intersectionality
- Nature of Neglect
- Risk Factors

## New DCF Child Protective Services Dashboard (Launched July 2023)

To learn more, visit: <https://www.mass.gov/info-details/child-protective-services-overview-dashboard>



<sup>7</sup> Specific tables and stratifications requested can be found in the Appendix.

Respondents report that providing more robust references, as well as counts and percents, would improve the respondent's ability to make useful comparison with other data sets, think critically about DCF's analysis, and cross reference the analysis with the tables and figures.

### Adding Metrics to the Report

All respondents request metrics that they would like to see added to the annual report. Each of these metrics is composed of components that may or may not be available. To determine the feasibility of adding the requested metrics to the DCF annual report, each metric component was reviewed by DCF, in collaboration with the OCA. The goal of this review was to determine the feasibility of including requested metrics/metric components in future reports. In total, respondents request an additional 152 metrics or metric components.<sup>8</sup> Those metrics would typically offer nuance or context to the metrics already provided in the report. The following domains were developed by the OCA upon review of the requested metrics:

<b>Table 1: Domains of Requested Metrics</b>	
<b>Requested Metric</b>	<b>Requested Metric Details</b>
<b>Budget and Expenditures</b>	Including sources of revenue and expenditures
<b>Case/Consumer Characteristics</b>	Especially related to caregiver disability status and indigency standards
<b>Decision Making</b>	including rational of determinations, reunification, and more nuanced neglect codes
<b>Educational Outcomes and Services</b>	Especially for children in placement
<b>Family Engagement and Family Time</b>	Including sibling, parent, and extended family contact while in placement, family-specific decisions about visitation and reunification
<b>Fatalities</b>	By demographic and identity characteristics
<b>Federally Reported Metrics</b>	Particularly Adoption and Foster Care Analysis and Reporting System (AFCARS), Family First Prevention Services Act (FFPSA) and Child and Family Services Reviews(CFSR)
<b>Findings from Foster Care Review</b>	N/A
<b>Home Removal</b>	Reporting on reason for removal by allegation, case/consumer characteristics, and removal time frames
<b>Intake/Response</b>	Information including 51A filing by profession and decision, more nuanced neglect allegation subcategories, and response determinations
<b>Kinship Searches and Placement</b>	N/A
<b>Outcomes</b>	Including re-entry, re-opening, recurrence of maltreatment, and exits from care
<b>Placement Stability and Timeliness</b>	N/A
<b>Service Delivery</b>	Including those that were declined by the state or populations who did not receive certain services,

<sup>8</sup> See Appendix for a full list of metrics and metric components stratified by domain.

Table 1: Domains of Requested Metrics	
	efforts to provide certain services, and provision of services by other agencies
<b>SSA Benefits</b>	Management of Social Security Administration Benefits
<b>Staffing</b>	Including number of people in each position, caseload by function, demographic and identity characteristics, and experience
<b>Transition Age Youth (TAY) Services</b>	Including transition plans and service provision

Metrics related to Educational Outcomes and Services are the most frequently requested, pointing to an opportunity for improvement in how DCF reports on education. The current system for reporting data to DCF creates barriers to reporting nuanced data, however (see “Reporting Education Data” for more information). Of the approximately 25 education-related metrics requested, nearly 60% were deemed infeasible. After education metrics, metrics related to Outcomes and Placement are the second and third most frequently requested.

### Nuanced Neglect Coding

Acknowledging that neglect is a broad term and is the most frequently occurring allegation, the OCA conducted a review of supported reports of neglect in out of home settings. The goal of the review was to establish subclassification of neglect that can (and do) inform OCA's work. While additional analysis would be needed to ensure these codes would sufficiently cover the range of types of caregiver neglect, these are offered as an example of what more nuanced neglect coding might look like. The OCA established the following subclassifications of Neglect:

**Boundary Issues:** A caregiver violates physical and/or emotional limits with a child such as physical contact, providing drugs or alcohol, or contact over social media.

**Delayed or no Healthcare:** A caregiver fails to ensure a child has proper and timely physical, dental, or behavioral health care.

**Failure to Meet Basic Needs:** A caregiver does not provide adequate food, clothing, or shelter. This also includes when safety concerns are present in the physical environment where a child lives, learns, plays, or receives services.

**Improper Behavior Management:** A caregiver does not respond properly to a child who is exhibiting problematic and/or concerning behaviors such as a restraint, or physical touch that does not result in a mark, or verbal abuse.

**Improper/Inadequate Supervision:** A caregiver engages in behaviors, activities, or actions that prevent them from being able to properly watch the child, such as not conducting bed check properly, sleeping while working etc.

**Inadequate Education:** Failure to assure the child has proper educational opportunities.

**Risk of Emotional/Psychological Harm:** a caregiver allows a child to be exposed to behaviors, activities or actions that pose a risk of harming a child's emotional or psychological state.

Requests for more nuanced reporting of neglect allegations appear across multiple domains, including home removal and intake/response.

Upon analysis of the metrics and their related components, DCF and OCA made the following determinations:

- **Available:** 21 requested metric components are available through various sources (see pg. 15)
- **Feasible:** 34 metric components could be to be produced – noting, however, that the addition of any new metrics requires DCF staff time for analysis and therefore must be considered carefully before production (see pg. 16)

- **Infeasible:** 32 metric components cannot be produced, either because data are not captured as structured data<sup>9</sup>, or because the data are held by a separate agency and are not reported to DCF (see pg. 20)
- **Privacy concerns or reporting limitations:** 17 metric components raise privacy concerns or have reporting limitations that would make the metric unreliable (see pg. 23)
- **Need a more complete definition:** 23 metric components require more clarity before feasibility can be determined (see pg. 25)
- **Need additional analysis:** 10 metrics require more consideration and investigation of the feasibility of alternative strategies, including exploring novel sources of data, before feasibility can be determined (see pg. 27)

### Reporting Education Data

Currently, education data sent to DCF from DESE are based on a defined cohort matching process for children in DCF custody. DCF provides DESE with a list of children in placement, which DESE then matches to school records. DCF only receives DESE data about children in DCF custody at the time of the match for a given marking period or school year. Those data are reported in summary and reflect an entire marking period or a school year, regardless of when the child's case with DCF opened or when the child enrolled in the school. Matching dates that children were in DCF placement with point in time data from DESE is not possible based on the way the data is provided. In other words, the DESE data could represent a time period prior to when the DCF custody/placement occurred.

DCF receives limited information from DESE. For example, information on educational attainment after case closure or once a child is no longer in DCF custody is not shared with DCF. Other data are not provided, and some data exists only in unstructured data fields.

Further complicating the issue, education data are collected and maintained through the 350 school districts in the Commonwealth. The data are not owned by DESE; however, they are provided through the DESE Student Information Management System (SIMS). The SIMS interface provided to DCF only shows the most recent school's enrollment and attendance information within the recent marking period for the child.

This cohort matching, non-longitudinal, and de-centralized data collection and reporting practice makes reporting education-related metrics difficult if not impossible. For example, if a child should attend three schools in three different school districts in a marking period, only data from the most recently enrolled school would be available through the interface. This reporting structure makes it easy to over or undercount DCF involved children in educational data and to assume correlations that may or may not exist.

To address some of these challenges, DCF is currently piloting the use of new Early Warning Indicator System (EWIS) data which will provide an attendance rate for all schools attended. Student-specific reporting will still be limited by the examples provided above.

<sup>9</sup> Structured data are data points that have a standardized format and definition, which aids in computational analysis.

Additional information about each of the metrics falling into the above feasibility categories is detailed below. Each section contains a table, organized by domain, that names a requested metric, and describes one or more components related to that metric. While requested metrics may appear in multiple tables, metric components do not. Education related metrics are analyzed separately due to the volume of the requests and the complexity of education metric reporting.

### Available

Some of the metric components requested by respondents are available through the recently released [Child Protective Services Dashboard](#), others are available through sources of information such as the [Foster Care Review](#) Annual Report and [National Youth In Transition Data Set](#). The source of each metric component is described in the table below.

Table 2: Metric Components that are Available			
Metric Domain	Requested Metric	Metric Components	Existing Report Type
Decision Making	Case disposition of the youth affected, including reunification; adoption or guardianship; or continuing foster care placement and the number of children and young adults with a specific permanency plan goal	Number of children and young adults with a specific permanency plan goal	DCF Annual Report & Dashboard
Foster Care Review	Findings from Foster Care Review		FCR Annual Report
Intake/Response	Data on protective intake outcome by race/ethnicity, age, and LGBTQIA+ Identity	Protective intake outcome by race/ethnicity	Dashboard
		Protective intake outcome by age of child	Dashboard
Intake/Response	Data on response determination (supported, substantiated concern, unsupported) by age of child, by LGBTQIA+ identity of the child	Response determination by age of child	Dashboard
Kinship	More nuanced reporting on kinship foster care, including kinship searches, kinship placements, needs, stability, and reunification, stratified by the child's age	Kinship placements stratified by child's age	Dashboard
Outcomes	Rates at which young adults who are leaving DCF custody have an education plan, employment, stable housing, daily living skills, health insurance, financial skills, medical and dental care, lifelong adult connections, and connections to other state agencies		National Youth in Transition Data Set
Placement	Placement information broken out by individual age (i.e., not age groupings) (Table 14 of the DCF Annual Report)		Dashboard

Table 2: Metric Components that are Available			
Metric Domain	Requested Metric	Metric Components	Existing Report Type
Placement	Permanency plan by age of child (Table 15b of the DCF Annual Report)		Dashboard
Placement	Permanency plan for young adults (18+) by race/ethnicity		Dashboard
Placement	Permanency plan by LGBTQIA+ (SOGIE <sup>10</sup> ) identity (Table 15c of the DCF Annual Report)		Dashboard
Placement	Permanency plan for young adults (18+) by LGBTQ+ (SOGIE) identity		Dashboard
Placement	Placement type by age (Table 16 of the DCF Annual Report)		Dashboard
Placement	Placement Length of Stay (LOS) by age of child		Dashboard
Placement	Placement Length of Stay (LOS) by LGBTQIA+ (SOGIE) identity		Dashboard
TAY	Number of young adults of each age involved with DCF (to show attrition by age)		Dashboard
Placement	Placement type by LGBTQIA+ (SOGIE) identity		Dashboard
Placement	Data on permanency plan disproportionality as it relates to race/ethnicity <sup>11</sup>		Dashboard
Placement	Placement data that are submitted via AFCARS – time in placement		Dashboard

### Feasible

44 of the metrics requested are currently deemed feasible to produce and are under review by DCF leadership to determine whether the metrics can and should be added to the DCF Annual Report or Dashboard, given staffing resource constraints. The metrics under consideration are listed below, including where the metric will appear if it is approved, and are stratified by domain. Reporting on these metrics through the DCF Dashboard requires developing a data warehouse for DCF's Office of Management and Planning Analysis (OMPA). Development of such a dashboard is under the purview of the Executive Office of Health and Human Services Information Technology group (EOHHS- IT), and it is the OCA's understanding that this project is being considered alongside many other critical IT projects requested by EOHHS-led agencies.

Table 3: Metrics that are Feasible and Currently Under Consideration by DCF Leadership			
Domain	Requested Metric	Metric Components	Ideal Reporting Format
Education	Enrollment by race	Limitation: Enrollment as defined by DESE. DCF will only include those coded as "enrolled" by DESE.	Annual Report & Dashboard

<sup>10</sup> SOGIE is sexual orientation, gender identity, and gender expression.

<sup>11</sup> The data to calculate this metric is publicly available through the dashboard, however, DCF does not currently provide the Rate of Disproportionality (ROD) and Relative Rate Index (RRI) calculation.



Table 3: Metrics that are Feasible and Currently Under Consideration by DCF Leadership			
Domain	Requested Metric	Metric Components	Ideal Reporting Format
Education	Enrollment by gender	Limitation: Enrollment as defined by DESE. DCF will only include those coded as “enrolled” by DESE.	Annual Report & Dashboard
Home Removal	Reason for removal (with a focus on disaggregation of the neglect category)	Reason for removal (i.e., AFCARS categories)	Annual Report & Dashboard
Federally reported metrics	Report the Adoption and Foster Care Analysis Report (AFCARS) data it reports to the National Data Archive on Child Abuse and Neglect (NDACAN), especially this data that states the type of disabilities children in DCF care have, whether the child’s disability was a factor in the removal decision	Data on the types of disabilities children in DCF care have	Annual Report & Dashboard
		Data on whether a child’s disability was a factor in the removal decision	Annual Report & Dashboard
Intake/Response	Table 29a (51As by allegation), 29b (Supported 51Bs <sup>12</sup> by supported allegation), and 29c (child victims by supported allegation) of the DCF Annual Report – Add data by race/ethnicity, age of child, LGBTQIA+ identity.		Dashboard
Intake/Response	Provide the reason why 51a reports were screened out and a breakdown of the types of mandated reporters whose reports are screened out	Provide a breakdown of the types of mandated reporters whose reports are screened out	Annual Report
Kinship	Children adopted by kin		Annual Report
Kinship	More nuanced reporting on kinship foster care, including kinship searches, kinship placements, needs, stability, and reunification, stratified by the child’s age	Length of time the average child is in foster care before a kinship placement occurs, stratified by geographic region	Dashboard
		Kinship placement stability stratified by child’s age	Dashboard
		Reunification from kinship placement stratified by child’s age	Dashboard
Outcomes	Recurrence of maltreatment data by race/ethnicity, age, and LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Maltreatment in foster care by race/ethnicity, age, and LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Foster care re-entry within 12 months data by race/ethnicity, age, and LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Data on consumer children opening/closing/re-openings by race/ethnicity, age, and LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Removal Reason for re-entry into care by race/ethnicity, age, LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Children in foster care who have been placed in three or more placements		Dashboard
Outcomes	Placement stability for children in placement less than 12 months by race/ethnicity, age, and LGBTQIA+ identity		Dashboard

<sup>12</sup> Pursuant to [M.G.L. c. 119 § 51B\(l\)](#), an Investigation of a report of abuse filed under Sec. 51A.

Table 3: Metrics that are Feasible and Currently Under Consideration by DCF Leadership			
Domain	Requested Metric	Metric Components	Ideal Reporting Format
Outcomes	Placement moves per 1,000 days in care by age of child		Dashboard
Outcomes	Placement moves per 1,000 days in care by LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Reunification in 12 months by race/ethnicity, age, and LGBTQIA+ (SOGIE) identity		Dashboard
Outcomes	Duplicate Table 23c of the DCF Annual Report but with data on permanency outcomes by age of exit- what percentage of 12-year-olds vs 16-year-olds who exit foster care exit to permanency (defined as adoption, reunification, or guardianship)		Dashboard
Outcomes	Duplicate Table 23c of the DCF Annual Report but with data on permanency outcomes by LGBTQ+ (SOGIE) identity of child		Dashboard
Outcomes	Duplicate Tables 24a, b, c, & d of the DCF Annual Report by age – add exit from care data by age for each of the types of exits from care (permanency including reunification/ adoption/ guardianship and aging out)		Dashboard
Outcomes	Duplicate Tables 24a, b, c, & d of the DCF Annual Report by LGBTQIA+ (SOGIE) identity of the child for each of the types of exits from care (permanency including reunification/ adoption/ guardianship and aging out)		Dashboard
Placement	Add race/ethnicity, age, and LGBTQIA+ (SOGIE) identity for children entering care in the fiscal year (Table 22 of the DCF Annual Report)		Dashboard
Placement	Placement instability data reported for all children in custody any given year, regardless of the length of stay in foster care – data about placement moves should be reported for children at 3 months, 6 months, 1 year, 18 months, 2 years, or longer than 2 years in foster care.		Dashboard
Placement	Number of young adults (youth) reunifying at age 17		Dashboard
Placement	Data on race/ethnicity characteristics of foster families, kinship providers	Data on race/ethnicity characteristics of unrelated foster families (parents)	Dashboard
		Data on race/ethnicity characteristics of kin foster families (parents)	Dashboard
Staffing	Number of staff in each position listed in Table 45A of the DCF Annual Report: Intake Worker, Response Worker, Ongoing Case Management, Adoption Case Management, and Foster Care Workers (Family Resource)		Annual Report
Staffing	DCF staffing including case worker workforce education and experience levels, turn over, office moves, and lived experience	DCF staffing including case worker turn over	Annual Report
		DCF staffing including case worker office moves	Annual Report
TAY	Transition age LGBTQIA+ youth remaining in care after turning 18 (Table 37a, 37b of the DCF Annual Report)		Annual Report & Dashboard
TAY	Number of transition age youth receiving each type of service included next to figure 37 of the DCF Annual Report	Number of transition age youth receiving each type of service	Annual Report

Table 3: Metrics that are Feasible and Currently Under Consideration by DCF Leadership			
Domain	Requested Metric	Metric Components	Ideal Reporting Format
TAY	Number of transition age youth receiving each type of service included next to figure 38 of the DCF Annual Report	Number of transition age youth receiving each type of service stratified by age (18-22)	Annual Report
Staffing	Foster Care/Family Resource Worker caseload		Annual Report
Case/Consumer Characteristics	Report on the number of parents and children with disabilities in the case load, including numbers of requests for reasonable accommodations they receive, as well as the number of disability related complaints they receive, broken down by area office	Number of requests for reasonable accommodations received (by area office)	Dashboard
Education	Graduation rates by race/ethnicity and LGBTQIA+ (SOGIE) identity	Graduation rates by race/ethnicity	Dashboard
		Graduation rates by LGBTQIA+ (SOGIE) identity	Dashboard
Education	School attendance rates by race/ethnicity, age, and LGBTQ+ (SOGIE) identity	School attendance rates by race/ethnicity	Dashboard
		School attendance rate by age of child	Dashboard
		School attendance rates by LGBTQIA+ (SOGIE) identity	Dashboard
Education	Number of children and young adults with an Individualized Education Plan (IEP)		Dashboard
Education	Breakdown table 39a of the DCF Annual Report (education-students with High Needs) by race/ethnicity, age of child, and LGBTQIA+ (SOGIE) identity.		Dashboard

An additional 10 metrics were determined feasible but require additional analysis before they are proposed for inclusion in the annual report or dashboard. Reporting these metric components requires developing methodologies for metric components that don't have a direct or structured data field, are ambiguous, relate to multiple potential data sources, or require point-in-time or longitudinal reporting such metrics based on a child's age, or annual expenditures.

Table 4: Metrics that are Feasible but Require Additional Analysis		
Domain	Requested Metric	Metric Components
Budget & Expenditures	Budget and expenditure data including a detailed overview of the MA child welfare funding mechanism (including a discussion of federal funding streams and an analysis of whether/how DCF is maximizing use of federal funding streams to provide child welfare services to children and youth in the Commonwealth); and increased transparency	Add a table that highlights service costs for children 0-17 and for young adults 18-22 in each category highlighted in table 43 of the DCF Annual Report (Service Costs).

Table 4: Metrics that are Feasible but Require Additional Analysis		
Domain	Requested Metric	Metric Components
	on expenditure specific to services and supports for transition-aged youth (youth 18-22 who signed a Voluntary Placement Agreement and are still receiving services from DCF), as requested in the final FY23 state budget	<i>Note that other metric components related to this overall metric description are listed in “metrics needing clarification or definition”</i>
Home Removal	Home removal by allegation (type) that resulted in the removal	Number of children removed from their home as a result of the allegation/response
Home Removal	Data on rates of child removals from their home of origin as a result of a 51A allegation	
Home Removal	Data on rates of child removals from their home of origin as a result of a 51B response for emergency responses (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity)	
Home Removal	Data on rates of child removals from their home of origin as a result of a 51B response for non-emergency responses (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity)	
Home Removal	Data on rates of child removals from their home of origin as a result of a 51A with a support finding (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity (Table 29c of the DCF Annual Report))	
Home Removal	Data on rates of child removals from their home of origin as a result of a 51A with a substantiated concern finding (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity)	
Home Removal	Data on emergency removals that were determined to be unsupported (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity)	
Home Removal	Data on emergency removals that were determined to be unsupported – percentage of children who were returned home (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity).	
Home Removal	Data on emergency removals that were determined to be unsupported – average time before the child returned home (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity).	

### Infeasible

There are three main reasons that certain requested metrics or one of their components are currently infeasible:

- 1) the data are not currently collected by DCF
- 2) the data are not currently collected in a structured data field
- 3) the data comes from another agency and are not currently provided to DCF in a format that allows matching with DCF records or stratification

The barrier to reporting is primarily that the data in question do not exist in structured data fields. Adding structure to these fields would require changes to DCF’s data collection system and training staff on new data entry requirements. In some circumstances, this may require negotiation with the union representing DCF social workers. In other circumstances, DCF is not the owners of the requested data, and reporting on the requested metrics or their component would require substantial cross-agency collaboration and policy changes. The following describes each metric requested and the corresponding barrier to reporting, stratified by domain.

Table 5: Other Metrics that are Currently Infeasible			
Domain	Requested Metric	Metric Component(s)	Barrier to Reporting
Case/Consumer Characteristics	Report on the number of parents and children with disabilities in the case load, including numbers of requests for reasonable accommodations they receive, as well as the number of disability related complaints they receive, broken down by area office	Number of disability related complaints received (by area office)	Unstructured
Case/Consumer Characteristics	Rate at which DCF consumers meet indigency standards		Unstructured
Decision Making	Decision making throughout the life of a DCF case should be reported based on income as well disability status and type of disability	Decision making throughout the life of a DCF case by income	Unstructured
Family Engagement/ Family Time	Child and family involvement in case planning		Signed FAAP is structured data – indicator for involvement is not structured
Home Removal	Reason for removal (with a focus on disaggregation of the neglect category)	Disaggregation by neglect category	Nature of neglect is not in structured data, nor is the “nature” of neglect defined
Intake/Response	Nuanced reporting of “Neglect” which describes the nature of the neglect and stratifies that nature by race and ethnicity		Nature of neglect is not in structured data, nor is the “nature” of neglect defined
Intake/Response	Provide the reason why 51A reports were screened out and a breakdown of the types of mandated reporters whose reports are screened out	Provide the reason why 51A reports were screened out	Unstructured
Intake/Response	Details on the sectors and types of reporters who file 51A’s, which of these are supported and unsupported, and the training and education Massachusetts is delivering to mandated reporters.	More details on the sectors and types of reporters who file 51A’s and the training and education Massachusetts is delivering to mandated reporters.	Unstructured
Service Delivery	How many children in DCF care are also served by another child-serving agency; what other agencies are supporting those children in DCF care; what types of services they are receiving; and comprehensive demographic information on who the multi-system involved children are.		Requires EOHHS-wide collaboration
Service Delivery	Number of young adults who seek to sign back into DCF’s care in order to receive DCF services but are declined		These data are not captured and DCF reports that it does not decline any youth seeking to sign back in for services.

Table 5: Other Metrics that are Currently Infeasible			
Domain	Requested Metric	Metric Component(s)	Barrier to Reporting
Service Delivery	Number of guardianship applications and reasons for declines		This is a legal process and data are collected by the court. DCF does not approve or deny guardianship.
Staffing	Include data on Adolescent Outreach Worker caseload		Unstructured
Staffing	Include data on caseloads for educational support staff – including the Regional Educational Specialists, Education Coordinators, and Education managers		Unstructured
TAY	Number and percent of TAY that have a transition plan, were involved in the development of the transition plan, and are satisfied with the transition plan	Number and percent of TAY that have a transition plan	Unstructured
		Number and percent of TAY that were involved in the development of their transition plan	Unstructured
		Number and percent of TAY that are satisfied with their transition plan	Unstructured
Staffing	DCF staffing including case worker workforce education and experience levels, turn over, office moves, and lived experience	DCF staffing including case worker lived experience	Unstructured
Education	How many required referrals are made for early intervention programs		Denominator can be determined in structured data – numerator not entirely in structured data
Education	Education data, stratified by time in placement: student retention, enrollment data, chronic absenteeism, dropout rate, mobility rate, enrollment in institutions of higher learning, student discipline, student discipline days missed, MCAS passage, etc.		Definition required DESE interface is limited to point in time data for children in DCF custody
Education	DESE data on education outcomes for youth in DCF care (such as required by federal education law) with special attention to data that research demonstrates have a specific impact on high school graduation (e.g., attendance, third grade reading, eighth grade mathematics, ninth grade retention)		Definition required DESE interface is limited to point in time data for children in DCF custody
Education	Focus on attendance and the relationship between placement moves and school attendance		DESE interface does not provide actual attendance dates to match to placement dates (DESE provides: # of days in attendance, # of days enrolled for marking period)
Education	Include more education data (i.e., grade retention, absenteeism, churn rate, school mobility and discipline) presented in an intersectional way		Definition required DESE interface is limited to point in time data for children in DCF custody

Table 5: Other Metrics that are Currently Infeasible			
Domain	Requested Metric	Metric Component(s)	Barrier to Reporting
Education	Mobility rate (school stability indicator) – how many school changes for children in foster care		Definition required DESE interface is limited to point in time data for children in DCF custody
Education	Retention		Definition required DESE interface is limited to point in time data for children in DCF custody
Education	Restraints (school based)		DESE interface does not provide this data element
Education	Advanced course completion		DESE interface does not provide this data element
Education	Grade 9 course passing records		DESE interface does not provide this data element
Education	Digital literacy and computer science course taking		DESE interface does not provide this data element
Education	How long it takes to hold a best interest determination (BID) meeting and the outcome of those BID meetings		Unstructured
Education	Children in foster care who did not graduate high school within 4/5 years		DCF does not receive graduation information for all children in DCF foster care.  The data are not available for all children sent by DCF.
Education	Graduates attending higher education		Unstructured Data
Education	SAT performance		Unstructured Data

### *Privacy Concerns or Reporting Limitations*

There are 15 requested metrics for which data is available in a structured format, but data cannot be reported at this time due to concerns about data reliability. Some of these concerns are temporary. For example, when new fields are added to the data collection system (iFamilyNet<sup>13</sup>), it can take time for workers to begin entering the data consistently and with fidelity. Over time, the reliability of that data should improve, and the metric should become feasible.

In other situations, the data availability issues are structural. For example, data on identity characteristics (such as a child's sexual orientation or gender identity) may not be available at the point of an emergency removal from a home, but as a case continues and response workers have more opportunities to gather information, the reliability of the metric improves. In general, data on identity characteristics is less reliable earlier in the DCF process than later; this

<sup>13</sup> iFamilyNet is the application DCF uses to maintain case records for DCF involved family and monitor case progress.

is a structural issue that is unlikely to change due to the nature of DCF's work and processes. Furthermore, self-reported metrics are not always complete and may not be reliable.

Finally, to protect the privacy of the children and families involved with DCF, some metrics with small counts cannot be reported out. This can at times be a barrier to disaggregation by specific identity metrics.

<b>Table 6: Metrics with Reporting Limitations</b>			
<b>Domain</b>	<b>Requested Metric</b>	<b>Metric Components</b>	<b>Limitation</b>
Case/Consumer Characteristics	Report on the number of parents and children with disabilities in the case load, including numbers of requests for reasonable accommodations they receive, as well as the number of disability related complaints they receive, broken down by area office	Number of parents and children with disabilities (by area office)	Data reliability concerns: Disabilities counts are generally dependent on self-report
Decision Making	Decision making throughout the life of a DCF case should be reported based on income as well disability status and type of disability	Decision making throughout the life of a DCF case by disability status and type of disability	Data reliability concerns: Data availability/reliability greater the further into DCF involvement a consumer goes
Family Engagement/ Family Time	Maintaining family connections while children are in foster care – visits with parents and siblings in foster care	Visits with parents (parent/child visits)	Data reliability concerns: Data may be unstructured (dictation entries)
		Visits with siblings	Data reliability concerns: Data may be unstructured (dictation entries)
Family Engagement/ Family Time	Family time data should be reported geographically across the Commonwealth, to identify disparate decision making, barriers to frequent family contact, and where family time may be happening in a more meaningful way		Data reliability concerns: Data may be unstructured (dictation entries)
Fatalities	Add fatalities by race/ethnicity of child, age of child, and LGBTQIA+ (SOGIE) identity (Table 40b of the DCF Annual Report)		Potential privacy concerns given small counts
Home Removal	Data on rates of child removals from their home of origin, stratified by identity, and including: removals as a result of a 51A allegation, as a result of a 51B response, in emergency and/or non-emergency responses	Data on rates of child removals from their home of origin, stratified by LGBTQIA+ identity (SOGIE)	Data reliability concerns: Data availability/reliability greater the further into DCF involvement a consumer goes
Intake/Response	Data on protective intake outcome by race/ethnicity, age, and LGBTQIA+ Identity	Protective intake by LGBTQIA+ (SOGIE) identity	Data reliability concerns: Data availability/reliability greater the further into DCF involvement a consumer goes



Table 6: Metrics with Reporting Limitations			
Domain	Requested Metric	Metric Components	Limitation
Intake/Response	Data on response determination (supported, substantiated concern, unsupported) by age of child, by LGBTQIA+ identity of the child	Response determination by LGBTQIA+ (SOGIE) identity of child	Data reliability concerns: Data availability/reliability greater the further into DCF involvement a consumer goes
Staffing	Add a table for caseload for each agency function		Caseload values limited to specific functions
Education	Average number of absences, the percentage of student absent 10 or more days, those absent more than 10% of the days, those absent more than 20% of the school days, and the percentage of unexcused absences in excess of nine days		Data limited to attended vs. enrolled by marking period
Education	Students still in school, high school equivalency, and percentage of students permanently excluded		Structural issues with how DESE data are reported

### Needing Clarification or Definition

DCF and OCA were unable to determine the feasibility of 23 metrics. The metrics, or their components, need greater clarification or definition before reporting feasibility can be determined. They are described below and stratified by domain.

Table 7: Metrics Needing Additional Clarification or Definitions			
Domain	Requested Metric	Metric Components	Definition Needed
Budget & Expenditures	Budget and expenditure data including a detailed overview of the MA child welfare funding mechanism (including a discussion of federal funding streams and an analysis of whether/how DCF is maximizing use of federal funding streams to provide child welfare services to children and youth in the Commonwealth); and increased transparency on expenditure specific to services and supports for transition-aged youth (youth 18-22 who signed a Voluntary Placement Agreement and are still receiving services from DCF), as requested in the final FY23 state budget	Add information on where the money is coming from – funding streams for all DCF operations/service delivery (Also: add one table with a breakdown by age group (0-17 and 18-22) – total funding for those populations and where the money is coming from)	Definition required
		An average breakdown of the percentage and source of funds including the use of Personal Needs Allowance funds versus funds previously given to the General Fund	Definition required
		Spending, stratified by state or federal funding	Definition required

Table 7: Metrics Needing Additional Clarification or Definitions			
Domain	Requested Metric	Metric Components	Definition Needed
Decision Making	Case disposition of the youth affected, including reunification; adoption or guardianship; or continuing foster care placement; and the number of children and young adults with a specific permanency plan goal	Case disposition of the youth affected, including reunification; adoption or guardianship; or continuing foster care placement	Definition required – is this a longitudinal metric? Define: “decision making” Define: “case disposition” Define: “youth affected”
Federally reported metrics	Services as enumerated under the Family First Prevention Services Act (FFPSA), enacted as part of Public Law (P.L.) 115—123: evidence-based mental health programs, substance abuse prevention and treatment, and in-home parent skill-based programs		Definition required – is this contracted service availability? Utilization? Or noncontracted service availability/utilization (i.e., paid through MassHealth, etc.)
Home Removal	Data on average timeframe before removal (stratified by race/ethnicity, age of child, LGBTQIA+ (SOGIE) identity		Definition required – what is the starting point for calculating the timeframe? Is it the most recent intake date? What if there were prior intakes without a removal?
Intake/Response	Details on the sectors and types of reporters who file 51A's, which of these are supported and unsupported, and the training and education Massachusetts is delivering to mandated reporters.	More details on the sectors (source?) and types of reporters who file 51A's, which of these are supported and unsupported	Definition required Define: “details” Define: “sectors and types”
Kinship	Children in DCF-supported kinship guardianships		Definition required
Kinship	More nuanced reporting on kinship foster care, including kinship searches, kinship placements, needs, stability, and reunification, stratified by the child's age	Kinship searches stratified by child's age – including timeliness of kin searches	Definition required Define: “kinship searches” Define: “timeliness”
		Kinship “needs” stratified by child's age	Definition required Define: “kinship “needs””
Placement	More nuanced data on placement stability, including but not limited to time without an official placement, and stratifications by race/ethnicity, age, and LGBTQIA+ (SOGIE) status		Definition required Define: “time without an official placement”
Placement	Data on placement moves per 1,000 days in care for ALL children in DCF care (not only children entering care in the last 12 months)		Definition required – what is the numerator and denominator?
Service Delivery	Family Resource Center usage and outcomes		Definition required Define: “usage” Define: “outcomes”  Note that a variety of data on FRC utilization is available in reports on the DCF website: <a href="https://www.mass.gov/info-details/departments-of-children-and-families-reports-data">https://www.mass.gov/info-details/departments-of-children-and-families-reports-data</a>

Table 7: Metrics Needing Additional Clarification or Definitions			
Domain	Requested Metric	Metric Components	Definition Needed
Service Delivery	Screening for human trafficking included, along intersectionality, geographically, placement type, and with more detailed reporting on runaways		Definition required Define: “screening for human trafficking” Define: “more detailed reporting”
Service Delivery	Services as enumerated under G.L. c 18B, § 2: counseling, group activities, “training in parenthood and home management for parents,” “family services intended to prevent the need for foster care and services to children in foster care,” and residential programs		Definition required – Support and Stabilization to intact families?
Service Delivery	Report safety and wellbeing data for children in residential care pursuant to G.L. c. 18B, §23		Definition required
Service Delivery	Safety and Risk assessment and management		Definition required
Service Delivery	Indian Child Welfare Act data		Definition required
Education	Attrition		Definition required – is this a longitudinal metric? Define: “attrition”
Education	Dropout rate		Definition required Reporting is limited to point in time data for children in DCF custody Data reliability: Numerator and denominator likely incomplete

### Needing Additional Analysis

A data source was not readily identifiable for 10 metrics related to staffing and social security administration benefits. DCF is exploring data availability and reporting feasibility with partner state agencies who maintain human resources or social security benefits data. Those metrics are detailed below.

Table 8: Metrics Needing Additional Analysis		
Metric Domain	Requested Metric	Metric Components
SSA Benefits	Average screening time for assessing eligibility for SSI benefits upon entering DCF placement, and at any subsequent interval	
SSA Benefits	Number of ABLE or trust accounts for SSI recipients and other savings accounts for Title II recipients that are opened; the percentages of benefits deposited into those account	
SSA Benefits	Rates in which DCF applies to be the child’s representative payee and keeps a disabled child’s Social Security Insurance payment	

**Table 8: Metrics Needing Additional Analysis**

<b>Metric Domain</b>	<b>Requested Metric</b>	<b>Metric Components</b>
SSA Benefits	Average monthly and total yearly amounts of Social Security Administration (SSA) benefits of children and young adults in foster care which are diverted to the MA General Fund, including (a) the total amount DCF received as rep payee; (b) how much went into General Fund, and (c) how much went into an account for the child. These data should include the average total amounts of Title II versus SSI benefits taken; The average total amounts of veterans' benefits taken; For SSI, Title II and veterans' benefits, to be reported separately, the percentages of benefits taken, including the number of children and adults affected for each percentage.	
SSA Benefits	Number of children and young adults for whom DCF has applied for SSI benefits and the disposition of such applications, including the number of denials not appealed; cases appealed and pending; appealed with claims allowed and appealed with claims pending	
SSA Benefits	Data regarding DCF's policy of taking social security benefits of children and young adults in foster care	
Staffing	Information about the race and ethnicity of DCF staff and their language abilities	Information about the race and ethnicity of DCF staff (EOHHS-held data)
		Information about the language abilities of DCF staff (EOHHS-held data)
Staffing	DCF staffing including case worker workforce education and experience levels, turn over, office moves, and lived experience	DCF staffing including case worker workforce education
		DCF staffing including case worker experience levels

### ABLE Accounts

Achieving a Better Life Experience Accounts, or ABLE accounts, are tax-advantaged savings accounts for individuals with disabilities. These accounts allow individuals and families to save and invest money for disability-related expenses without losing eligibility for certain federal benefits, such as Supplemental Security Income (SSI) and MassHealth. ABLE accounts are available through the Attainable Savings Plan, which is managed by Fidelity Investments. This plan provides various investment options and benefits tailored to individuals with disabilities and their families.

DCF leverages ABLE account to promote financial stability of families and children/youth with disabilities and support Transition Aged Youth by depositing social security payments into their account for the child's use at a later date. In recent months, DCF has rapidly opened many ABLE accounts for DCF-involved children and their families by incorporating ABLE account navigation in case planning and collaborating with disability advocacy groups and financial institutions to raise awareness about the accounts through workshops and informational sessions.

By leveraging ABLE accounts, the Massachusetts DCF is helping to secure a more stable and financially secure future for children and young adults with disabilities, empowering them to achieve greater independence and quality of life. DCF now has a mechanism for identifying the total number of children receiving social security benefits and the children for whom ABLE accounts are created and is hoping to report these figures in future annual reports. The agency is working on a methodology and mechanism for reporting the number of applications submitted where DCF is named as the representative payee.

### Feasibility Assessment of Respondent-Submitted Research Questions

The request for public comment asked respondents to identify research questions they were seeking to answer that they believed could not be answered by DCF's available data. In the chart below, the OCA analyzed each question and the extent to which we believe the research question could partially or fully be answered based on data that is available or that, based on the prior analysis of metrics under consideration by DCF leadership, could eventually be feasibly produced.<sup>14</sup> The OCA determined that at least two of the proposed questions can be answered using the new data dashboard. Another 12 questions relate to metrics that are currently under review by DCF leadership, and three needed further clarification before feasibility could be assessed. Ultimately only two questions were deemed currently infeasible. The table below describes each of the research questions posed and the OCA's feasibility assessment.

---

<sup>14</sup> We note that, for some questions, data can help illuminate but may not be enough, on its own, to fully answer the research questions posed.

### *Possible using the new Child Protective Services Dashboard*

- The disproportionate impact of the child welfare system on Massachusetts children of color, children who identify as LGBTQIA+, and children with disabilities who are overrepresented in child welfare

### *Feasible if Additional Metrics are Produced*

- The contribution of mandated reporting on disproportionality in DCF
- When in the life of a clinical case does placement instability occur most often? Does placement instability get worse the longer a child is in foster care? Or do most placement moves occur in the first few weeks after removal? Are children more vulnerable to the trauma of placement instability the longer they are in DCF custody? Why are children in Massachusetts suffering so much placement instability?
- Is DCF preparing transition age youth for adulthood?<sup>15</sup>
- Are children of color more likely to re-enter care?
- Are older children more likely to re-enter care?
- Are LGBTQIA+ children more likely to re-enter care?
- How do these specific demographics impact the rates of case openings, case closings, and case re-openings?
- Is placement instability in the first 12 months more common for children of color and/or older children and/or LGBTQIA+ children?
- Are children of color/older children/LGBTQIA+ children more likely to have more than 2 placements in the first 12 months than younger children or white children?
- Are children of color/older children/LGBTQIA+ children more likely to enter care?
- Are children of color/older children/ LGBTQIA+ children more likely to re-enter care after having exited more than 12 months ago/within 12 months?

### *Require More Definition or Analysis*

<b>Table 9: Research Questions Requiring More Definitions or Feasibility Assessment</b>	
<b>Question</b>	<b>OCA Assessment</b>
Less than 17% of child victims entered an out-of-home placement – what happened to the other ones? Which type of supported allegation is more likely to result in a foster care placement?	Metric(s) related to this work may be feasible for DCF to produce in future years, but need additional analysis
Spending for key areas of the work (including state versus federal funding) would help advocates educate state and federal lawmakers about the costs, challenges, and needs.	Metric(s) related to this work need additional definition before feasibility can be determined
Is DCF making measurable progress towards modernizing its practices and improving outcomes for the families it serves?	This question needs defined metrics before feasibility can be determined
How does DCF facilitate sibling, parent, and extended family contact to promote family bonds while children are in foster care? Is DCF making child-specific and family-specific decisions about visitation, modifying policies to fit the needs of the individual family and promote family reunification?	This question needs defined metrics before feasibility can be determined

<sup>15</sup> Partially feasible.

*Partially or Completely Infeasible at this Time*

- Why are families becoming involved with DCF? Or why is DCF removing children from their families?
- What specific services does DCF deliver to stabilize families, avoid removal of children, and reunify families quickly? Are those services effective? Do families in certain areas of the Commonwealth have access to different (or better) services than others?
- How are children with disabilities treated while in DCF custody? Do children with disabilities receive disparate treatment once in foster care, as compared to children without a disability? Are children with disabilities more likely to be abused or neglected once they enter foster care than their counterparts?
- Are poor families unfairly vulnerable to DCF oversight? Does DCF make different decisions for parents with means as compared to poor parents (i.e., screening decisions in certain neighborhoods as compared to neighborhoods with different income levels, decisions to support a 51A, DA referrals, removing a child, opening a clinical case, etc.)? Do parents of means avoid 51A reports whereas families in lower income communities experience increased 51A filing?

## Recommendations from the OCA

Based on the feedback received during the public comment period as well as our own experience, the OCA recommends the following:

**Develop a new and thoughtful strategy for reporting education data:** Respondents pointed to a substantial and yet unmet need in the area of metrics related to education for DCF involved children, particularly those who are placed in foster or congregate care. Understanding educational attainment in terms of graduation and test scores, absenteeism, discipline and more provides salient information about the experiences, needs and life-trajectory of DCF involved children. Adequate presentation of educational data requires a new and thoughtful strategy, which DCF, DESE, and the OCA should collaborate to create. This strategy should lay out metrics, methodologies, data sharing agreements, and reporting protocols.

**Establish more nuanced neglect reporting:** Respondents aptly noted the challenge presented by the broad sweeping neglect allegation category. Neglect is the most frequently occurring allegation with 73% of 51A filings and 87% of supported 51B responses involving neglect in FY22.<sup>16</sup> Neglect allegations cover a broad range of concerns, ranging from failure to provide for basic needs, issues related to supervision, risk of emotional or psychological harm, boundary issues or grooming that does not rise to the level of sexual assault, and improper behavior management that does not rise to the level of physical abuse. More nuanced reporting of neglect is necessary to create a fuller understanding of the experiences of children and opportunities for prevention. The OCA recommends that DCF create neglect subclassifications and report those subclassifications regularly.

**Prioritize the release of metrics for which there are no data quality or privacy concerns:** Based on feedback from this public comment period, DCF identified 44 metrics that are feasible to produce and will add contextual information and nuance that can help assess and understand the current state of child protective services in Massachusetts. Those metrics relate to transition age youth, mandated reporting, outcomes, placement, staffing, and more.<sup>17</sup> DCF leadership is currently determining whether or not to include those metrics on the dashboard or in the annual report in future years. The OCA encourages DCF leadership to produce feasible metrics moving forward, recognizing that further prioritization may be necessary based on resource availability.

**Assess data quality concerns on an annual basis:** DCF identified 13 metrics which are feasible to produce yet are not under consideration by leadership due to data reliability concerns. Over time, DCF anticipates that these concerns will lessen until such a time that they are reliable and can be reported. To assure the data reliability concerns are addressed, the OCA recommends that DCF continue their annual quality control checks on the metrics. This check will help DCF

---

<sup>16</sup> DCF FY22 Annual Report, pg. xiii <https://www.mass.gov/doc/fy-2022/download>

<sup>17</sup> See pg. 16 for complete list metrics that are feasible and currently under consideration by DCF leadership.



determine when their quality concerns are satisfactorily resolved and identify metrics in need of an improvement plan. Once the quality concerns are resolved, the OCA recommends reporting those metrics.<sup>18</sup>

**Adequately fund and staff DCF to support data and quality assurance functions:** To effectively collect and report on additional metrics, adequate funding and staffing for DCF is imperative. The data collection process requires significant time, specialized and well-trained personnel, and resources across all levels of the agency, and beyond as EOHHS-IT supports the architecture of the data collection system and provides all data extracts as no Data Warehouse exists for data extraction. Reporting starts with front line workers, who are charged with providing personable services to families while also documenting those efforts. Quality control of documentation often fall to supervisors, who are tasked with reviewing and approving data entry and documentation on specific timelines. Data analysis is done by professionals adept at statistics, data visualization and data translation science who must make sense of the data and turn it into action. The quality of data entry, presentation, and analysis is directly influenced by staffing levels and capacity. If additional metrics are to be incorporated, it is essential for the legislature to ensure that DCF is sufficiently staffed and funded to do this additional work.

---

<sup>18</sup> See pg. 23 for a complete list of metrics with data reliability concerns.

## Conclusion

Overall, respondents acknowledged that the FY22 DCF Annual Report does a more thorough job of presenting child protective services data as compared to the prior reporting mechanisms. Analysis of the requests submitted by respondents demonstrates that the new [Child Protective Services Dashboard](#) provides substantial value added and will be a benefit to the respondents to the public comment and others working in the field of child protection. Still, there is more that can and should be done to ensure this data is as transparent and user-friendly as possible. The OCA acknowledges DCF's strides and efforts in improved data reporting. Reporting has come a long way in a short period of time. The OCA hopes that DCF will continue this positive momentum by implementing the recommendations provided in this report which are based on the feedback provided by respondents to the public comment.

## Appendix

<b>Table 10: Specific Stratifications Requested</b>
Add table 15b – permanency plan by age of child
Add table 15c – permanency plan by LGBTQ+ identity of child
Add table: Placement type by age – alternatively: add adolescent age category (14-18) in table 16
Add race/ethnicity, age, and LGBTQ+ identity data to table 22 – children entering care in the fiscal year
Duplicate table 23c but with data on permanency outcomes by age of exit- what percentage of 12-year-olds vs 16-year-olds who exit foster care exit to permanency (defined as adoption, reunification, or guardianship)
Duplicate table 23c but with data on permanency outcomes by LGBTQ+ Identity of child
Duplicate Tables 24a, b, c, & d by age – add exit from care data by age for each of the types of exits from care (permanency including reunification/ adoption/ guardianship and aging out)
Duplicate Tables 24a, b, c, & d by LGBTQ+ identity – add exit from care data by LGBTQ+ identity of the child for each of the types of exits from care (permanency including reunification/ adoption/ guardianship and aging out)
Table 29a, 29b, and 29c – Add data by race/ethnicity, age of child, LGBTQ+ identity
Table 29c – of the unduplicated child victims of supported allegations – how many entered care as a result of the supported allegation – by category + by race/ethnicity, age of child, LGBTQ+ identity
Breakdown table 39a by race/ethnicity, age of child, and LGBTQ+ identity
Add fatalities by race/ethnicity of child, age of child, and LGBTQ+ identity – add to table 40b
Update table 14 (or add new table) that provides a breakdown of race/ethnicity of children and youth adults in placement by age

<b>Table 11: Specific Contextual Information and Narratives Requested</b>	
<b>Type</b>	<b>Description</b>
Aims	Narrative that connects systems input and output data to the mission, aim, and strategy of DCF
Aims	Explanation of how and why targets are selected, especially if it differs from statewide or national averages/standards
Aims	Include three-year targets for safety, permanence, and well-being
Analysis	Observations and hypothesis about the data. Example: Why TAY left care
Analysis	Add analysis of who has a permanency plan that is not meeting the federal standard that describes age, LGBTQ+ identity etc.
Anticipated Outcomes	Explain what the anticipated impacts of increased funding and staffing have on the outcomes of children and youth in the system
Anticipated Outcomes	Describe when, how and why DCF policy, practice, or priority revision are implemented. Examples: Trauma Informed Services, Court-Led Initiative, Collaboration with EOHS, Onboarding Foster homes, Permanency Round Table Expansion
Anticipated Outcomes	Additional information about newly created positions and the intended impact or outcome of service delivery
Challenges	Add narrative about current challenges with providing appropriate support for multi-agency involved youth (including challenges with establishing/agreeing

Table 11: Specific Contextual Information and Narratives Requested	
Type	Description
	upon payment structures between agencies) as well as opportunities for improvement and bright spots/successes in supporting multi-agency involved youth
Challenges	What obstacles exist when identifying or accepting kin for placement, how does DCF support kin in meeting criteria, and how does this number of kin placements impact guardianships, adoptions
Challenges	Provide a more complete picture, analysis, or plan to address problems such as challenges in congregate placements, placement instability, dearth of placements, challenges with placement matching, overuse of certain placements, and impact of long-term placement moves
Challenges	Analysis of the relationship between placement moves and school attendance
Challenges	Add analysis of vacancy rate and turnover rate over the last fiscal year, on average how many positions were vacant, how many staff were hired and how many staff left –this provides an opportunity to highlight specific regions where staffing is a success and regions where staffing is especially a challenge
Comparison	Comparison with general Massachusetts population data, especially in regard to educational outcomes and attainment
Comparison	Compare rates and proportions of race ethnicity at each decision point to the overall DCF population and the general Massachusetts population
Comparison	Contextualize the data with national standards, especially as it relates to placements and congregate care
Disparities	Address the persistent disparities in the child welfare system in the goals of DCF and in the executive summary and beyond, especially when it is substantial. Example: 51A report disparities is high, yet the annual report does not explore the issue in depth
Disparities	Include analysis of Rate-of-Disproportionality (RoD) and Relative Rate Index (RRI) on all metrics for which identity characteristics are provided
Disparities	Explain the extremely low four-year high school graduation rate and other poor outcomes for Massachusetts students in Foster Care
Improvement Plan	Including a plan for how to improve the measures
Observations	Provide observations of the data, particularly when there is an increase, decrease, stagnation of outcome or failure to meet national standards
Practice Changes	Information or updates regarding the use of predictive algorithms
Practice Changes	Progress on opening ABLE or trust accounts for SSI recipients and other savings accounts for Title II recipients and any explanation of obstacles to opening such account that DCF encountered and efforts to overcome these barriers
Practice Changes	Changes in practices related to communication with service recipients about SSA Benefits, financial empowerment, and how to find such information
Context	Provide contextual information that often maltreatment in foster care often does not come to light until a child ages out of service

**Table 12: Metrics Requested Stratified by Domain**

Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
Budget & Expenditures	Budget and expenditure data including a detailed overview of the MA child welfare funding mechanism (including a discussion of federal funding streams and an analysis of whether/how DCF is maximizing use of federal funding streams to provide child welfare services to children and youth in the Commonwealth); and increased transparency on expenditure specific to services and supports for transition-aged youth (youth 18-22 who signed a Voluntary Placement Agreement and are still receiving services from DCF), as requested in the final FY23 state budget	A. Add information on where the money is coming from – funding streams for all DCF operations/service delivery (Also: add one table with a breakdown by age group (0-17 and 18-22) - total funding for those populations and where the money is coming from)	Definition required	
		B. Add a table that highlights service costs for children 0-17 and for young adults 18-22 in each category highlighted in table 43 (Service Costs).	Feasible - additional analysis needed	
		C. An average breakdown of the percentage and source of funds including the use of Personal Needs Allowance funds versus funds previously given to the General Fund	Definition required	
		D. Spending, stratified by state or federal funding	Definition required	
Case/Consumer Characteristics	Report on the number of parents and children with disabilities in the case load, including numbers of requests for reasonable accommodations they receive, as well as the number of disability related complaints they receive, broken down by area office	A. Number of parents and children with disabilities (by area office)	Data Reliability concerns	
		B. Number of requests for reasonable accommodations received (by area office)	Feasible	
		C. Number of disability related complaints received (by area office)	Infeasible	
Case/Consumer Characteristics	Rate at which DCF consumers meet indigency standards		Infeasible	
Decision Making	Decision making throughout the life of a DCF case should be reported based on income as well disability status and type of disability	A. Decision making throughout the life of a DCF case by income	Infeasible	
		B. Decision making throughout the life of a DCF case by disability status and type of disability	Data reliability concerns	
Decision Making	Case disposition of the youth affected, including reunification; adoption or guardianship; or continuing foster care placement; and the number of	A. Case disposition of the youth affected, including reunification; adoption or guardianship; or continuing foster care placement	Definition required	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
	children and young adults with a specific permanency plan goal	B. Number of children and young adults with a specific permanency plan goal	Available	Annual Report & Dashboard
Education	Graduation rates by race/ethnicity and LGBTQ+ (SOGIE) identity	A. Graduation rates by race/ethnicity	Feasible	
		B. Graduation rates by LGBTQ+ (SOGIE) identity	Feasible	
Education	School attendance rates by race/ethnicity, age, and LGBTQ+ (SOGIE) identity	A. School attendance rates by race/ethnicity	Feasible	
		B. School attendance rate by age of child	Feasible	
		C. School attendance rates by LGBTQ+ (SOGIE) identity	Feasible	
Education	Children in foster care who did not graduate high school within 4/5 years		Infeasible	
Education	Education data, stratified by time in placement: student retention, enrollment data, chronic absenteeism, dropout rate, mobility rate, enrollment in institutions of higher learning, student discipline, student discipline days missed, MCAS passage, etc.		Definition required	
Education	Number of children and young adults with an Individualized Education Plan (IEP)		Feasible	
Education	DESE data on education outcomes for youth in DCF care (such as required by federal education law) with special attention to data that research demonstrates have a specific impact on high school graduation (e.g., attendance, third grade reading, eighth grade mathematics, ninth grade retention)		Definition required	
Education	Focus on attendance and the relationship between placement moves and school attendance		Infeasible	
Education	Include more education data (i.e., grade retention, absenteeism, churn rate, school mobility and discipline) presented in an intersectional way		Definition required	
Education	Attrition		Definition required	
Education	Dropout rate		Definition required	
Education	Graduates attending higher education		Infeasible	
Education	Enrollment by race and gender	A. Enrollment by race	Feasible	
		B. Enrollment by gender	Feasible	
Education	Mobility rate (school stability indicator) - how many school changes for children in foster care		Definition required	
Education	Retention		Definition required	
Education	Restrains (school based)		Infeasible	
Education	Advanced course completion		Infeasible	
Education	Plans for high school graduates		Definition required	
Education	SAT performance		Infeasible	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
Education	Grade 9 course passing records		Infeasible	
Education	Digital literacy and computer science course taking		Infeasible	
Education	Students still in school, high school equivalency, and percentage of students permanently excluded		Data reliability concerns	
Education	Average number of absences, the percentage of student absent 10 or more days, those absent more than 10% of the days, those absent more than 20% of the school days, and the percentage of unexcused absences in excess of nine days		Reporting Limitation	
Education	Breakdown table 39a (education-students with High Needs) by race/ethnicity, age of child, and LGBTQ+ (SOGIE) identity.		Feasible	
Education	How many required referrals are made for early intervention programs		Infeasible	
Education	How long it takes to hold a best interest determination (BID) meeting and the outcome of those BID meetings		Infeasible	
Family Engagement/ Family Time	Child and family involvement in case planning		Infeasible	
Family Engagement/ Family Time	Maintaining family connections while children are in foster care - visits with parents and siblings in foster care	A. Maintaining family connections while children are in foster care - visits with parents (parent/child visits)	Data reliability concerns	
		B. Maintaining family connections while children are in foster care - visits with siblings	Data reliability concerns	
Family Engagement/ Family Time	Family time data should be reported geographically across the Commonwealth, to identify disparate decision making, barriers to frequent family contact, and where family time may be happening in a more meaningful way		Data reliability concerns	
Federally Reported Metrics	Services as enumerated under the Family First Prevention Services Act (FFPSA), enacted as part of Public Law (P.L.) 115—123: evidence-based mental health programs, substance abuse prevention and treatment, and in-home parent skill-based programs		Definition required	
Fatalities	Add fatalities by race/ethnicity of child, age of child, and LGBTQ+ (SOGIE) identity (Table 40b)		Privacy Concern	
Foster Care Review	Findings from Foster Care Review		Available	FCR Annual Report
Home Removal	Reason for removal (with a focus on disaggregation of the neglect category)	A. Reason for removal (i.e., AFCARS categories)	Feasible	
		B. Disaggregation by neglect category	Infeasible	
Home Removal	Data on rates of child removals from their home of origin, stratified by identity, and	A. Data on rates of child removals from their home of	Data reliability concerns	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
	including: removals as a result of a 51A allegation, as a result of a 51B response, in emergency and/or non-emergency responses	origin, stratified by identity (SOGIE)		
		B. Data on rates of child removals from their home of origin as a result of a 51A allegation	Feasible - additional analysis needed	
		C. Data on rates of child removals from their home of origin as a result of a 51B response for emergency responses (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity)	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
		D. Data on rates of child removals from their home of origin as a result of a 51B response for non-emergency responses (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity)	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
		E. Data on rates of child removals from their home of origin as a result of a "51A" with a support finding (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity (Table 29c))	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
		F. Data on rates of child removals from their home of origin as a result of a "51A" with a substantiated concern finding (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity)	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
		G. Data on emergency removals that were determined to be unsupported (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity)	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
		H. Data on emergency removals that were determined to be unsupported - percentage of children who were returned home (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity).	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	



Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
		I. Data on emergency removals that were determined to be unsupported - average time before the child returned home (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity).	Feasible - additional analysis needed; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
Home Removal	Home removal by allegation (type) that resulted in the removal	A. Number of children removed from their home as a result of the allegation/response	Feasible - additional analysis needed	
Home Removal	Data on average timeframe before removal (stratified by race/ethnicity, age of child, LGBTQ+ (SOGIE) identity)		Definition required; Data reliability concerns on demographics especially LGBTQ+ SOGIE	
Federally Reported Metrics	Report the Adoption and Foster Care Analysis Report (AFCARS) data it reports to the National Data Archive on Child Abuse and Neglect (NDACAN), especially this data that states the type of disabilities children in DCF care have, whether the child's disability was a factor in the removal decision	A. Data on the types of disabilities children in DCF care have	Feasible	
		B. Data on whether a child's disability was a factor in the removal decision	Feasible	
Intake/Response	Table 29a (51As by allegation), 29b (Supported 51Bs by supported allegation), and 29c (child victims by supported allegation) – Add data by race/ethnicity, age of child, LGBTQ+ identity.		Feasible	
Intake/Response	Nuanced reporting of “Neglect” which describes the nature of the neglect and stratifies that nature by race and ethnicity		Infeasible	
Intake/Response	Data on protective intake outcome by race/ethnicity, age, and LGTBQ+ Identity	A. Protective intake outcome by race/ethnicity	Available	Dashboard
		B. Protective intake outcome by age of child	Available	Dashboard
		C. Protective intake by LGBTQ+ (SOGIE) identity	Data reliability concerns	
Intake/Response	Data on response determination (supported, substantiated concern, unsupported) by age of child, by LGBTQ+ identity of the child	A. Response determination by age of child	Available	Dashboard
		B. Response determination by LGBTQ+ (SOGIE) identity of child	Data reliability concerns	
Intake/Response	Provide the reason why 51A reports were screened out and a	A. Provide the reason why 51A reports were screened out	Infeasible	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
	breakdown of the types of mandated reporters whose reports are screened out	B. Provide a breakdown of the types of mandated reporters whose reports are screened out	Feasible	
Intake/Response	Details on the sectors and types of reporters who file 51A's, which of these are supported and unsupported, and the training and education Massachusetts is delivering to mandated reporters.	A. More details on the sectors (source?) and types of reporters who file 51A's, which of these are supported and unsupported	Definition required	
		B. More details on the sectors and types of reporters who file 51A's and the training and education Massachusetts is delivering to mandated reporters.	Infeasible	
Kinship	Children in DCF-supported kinship guardianships		Definition required	
Kinship	Children adopted by kin		Feasible	
Kinship	More nuanced reporting on kinship foster care, including kinship searches, kinship placements, needs, stability and reunification, stratified by the child's age	A. Kinship searches stratified by child's age - including timeliness of kin searches	Definition required	
		B. Length of time the average child is in foster care before a kinship placement occurs, stratified by geographic region	Feasible	
		C. Kinship placements stratified by child's age	Available	Dashboard
		D. Kinship "needs" stratified by child's age	Definition required	
		E. Kinship placement stability stratified by child's age	Feasible	
		F. Reunification from kinship placement stratified by child's age	Feasible	
Outcomes	Rates at which young adults who are leaving DCF custody have an education plan, employment, stable housing, daily living skills, health insurance, financial skills, medical and dental care, lifelong adult connections, and connections to other state agencies.		Available	NYTD
Outcomes	Recurrence of maltreatment data by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Maltreatment in foster care by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Foster care re-entry within 12 months data by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Data on consumer children opening/closing/re-openings by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Reason for re-entry into care by race/ethnicity, age, LGBTQ+ (SOGIE) identity		Feasible	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
Outcomes	Recurrence of maltreatment data by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Foster care re-entry within 12 months data by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Children in foster care who have been placed in three or more placements		Feasible	
Outcomes	Placement stability for children in placement less than 12 months by race/ethnicity, age, and LGBTQ+ identity		Feasible	
Outcomes	Placement moves per 1,000 days in care by age of child		Feasible	
Outcomes	Placement moves per 1,000 days in care by LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Reunification in 12 months by race/ethnicity, age, and LGBTQ+ (SOGIE) identity		Feasible	
Outcomes	Duplicate Table 23c but with data on permanency outcomes by age of exit- what percentage of 12-year-olds vs 16-year-olds who exit foster care exit to permanency (defined as adoption, reunification, or guardianship)		Feasible	
Outcomes	Duplicate Table 23c but with data on permanency outcomes by LGBTQ+ (SOGIE) identity of child		Feasible	
Outcomes	Duplicate Tables 24a, b, c, & d by age – add exit from care data by age for each of the types of exits from care (permanency including reunification/ adoption/ guardianship and aging out)		Feasible	
Outcomes	Duplicate Tables 24a, b, c, & d by LGBTQ+ (SOGIE) identity of the child for each of the types of exits from care (permanency including reunification/ adoption/ guardianship and aging out)		Feasible	
Placement	Placement information broken out by individual age (i.e., not age groupings) (Table 14)		Available	Dashboard
Placement	Add race/ethnicity, age, and LGBTQ+ (SOGIE) identity for children entering care in the fiscal year (Table 22)		Feasible	
Placement	More nuanced data on placement stability, including but not limited to time without an official placement, and stratifications by race/ethnicity, age, and LGBTQIA+ (SOGIE) status		Definition required	
Placement	Placement instability data reported for all children in custody any given year, regardless of the length of stay in foster care - data about placement moves should be reported for children at 3 months, 6 months, 1 year, 18 months, 2 years, or longer than 2 years in foster care.		Feasible	
Placement	Data on placement moves per 1,000 days in care for ALL children in DCF care (not only children entering care in the last 12 months)		Definition required	
Placement	Permanency plan by age of child (Table 15b)		Available	Dashboard
Placement	Data on permanency plan disproportionality as it relates to race/ethnicity		Available	Dashboard
Placement	Permanency plan for young adults (18+) by race/ethnicity		Available	Dashboard

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
Placement	Permanency plan by LGBTQ+ (SOGIE) identity (Table 15c)		Available	Dashboard
Placement	Permanency plan for young adults (18+) by LGBTQ+ (SOGIE) identity		Available	Dashboard
Placement	Placement type by age (Table 16)		Available	Dashboard
Placement	Placement type by LGBTQ+ (SOGIE) identity		Available	Dashboard
Placement	Placement Length of Stay (LOS) by age of child		Available	Dashboard
Placement	Placement Length of Stay (LOS) by LGBTQ+ (SOGIE) identity		Available	Dashboard
Placement	Placement data that are submitted via AFCARS - time in placement		Available	Dashboard
Placement	Number of young adults (youth) reunifying at age 17		Feasible	
Placement	Data on race/ethnicity characteristics of foster families, kinship providers	A. Data on race/ethnicity characteristics of unrelated foster families (parents)	Data reliability concerns	
		B. Data on race/ethnicity characteristics of kin foster families (parents)	Data reliability concerns	
Service Delivery	How many children in DCF care are also served by another child-serving agency; what other agencies are supporting those children in DCF care; what types of services they are receiving; and comprehensive demographic information on who the multi-system involved children are.		Infeasible	
Service Delivery	Number of young adults who seek to sign back into DCF's care in order to receive DCF services but are declined		Infeasible	
Service Delivery	Number of guardianship applications and reasons for declines		Infeasible	
Service Delivery	Report safety and wellbeing data for children in residential care pursuant to G.L. c. 18B, §23		Definition required	
Service Delivery	Family Resource Center usage and outcomes		Definition required	
Service Delivery	Safety and Risk assessment and management		Definition required	
Service Delivery	Screening for trafficking included, along intersectionality, geographically, placement type, and with more detailed reporting on runaways		Definition required	
Service Delivery	Indian Child Welfare Act data		Definition required	
Service Delivery	Services as enumerated under G.L. c 18B, § 2: counseling, group activities, "training in parenthood and home management for parents," "family services intended to prevent the need for foster care and services to children in foster care," and residential programs		Definition required	
Service Delivery	Breakdown of youth who are NOT completing a medical visit – by race, age, and LGBTQ+ (SOGIE) identity		Infeasible	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
SSA Benefits	Average monthly and total yearly amounts of Social Security Administration (SSA) benefits of children and young adults in foster care which are diverted to the MA General Fund, including (a) the total amount DCF received as rep payee; (b) how much went into General Fund, and (c) how much went into an account for the child. These data should include The average total amounts of Title II versus SSI benefits taken; The average total amounts of veterans' benefits taken; For SSI, Title II and veterans' benefits, to be reported separately, the percentages of benefits taken, including the number of children and adults affected for each percentage.		Needs Additional Analysis	
SSA Benefits	Average screening time for assessing eligibility for SSI benefits upon entering DCF placement, and at any subsequent interval.		Needs Additional Analysis	
SSA Benefits	Number of children and young adults for whom DCF has applied for SSI benefits and the disposition of such applications, including the number of denials not appealed; cases appealed and pending; appealed with claims allowed and appealed with claims pending		Needs Additional Analysis	
SSA Benefits	Number of ABLE or trust accounts for SSI recipients and other savings accounts for Title II recipients that are opened; the percentages of benefits deposited into those account		Needs Additional Analysis	
SSA Benefits	Data regarding DCF's policy of taking social security benefits of children and young adults in foster care		Needs Additional Analysis	
SSA Benefits	Rates in which DCF applies to be the child's representative payee and keeps a disabled child's Social Security Insurance payment		Needs Additional Analysis	
Staffing	Number of staff in each position listed in Table 45A: Intake Worker, Response Worker, Ongoing Case Management, Adoption Case Management, and Foster Care Workers (Family Resource)		Feasible	
Staffing	Add a table for caseload for each agency function		Reporting Limitation	
Staffing	Include data on Adolescent Outreach Worker caseload		Infeasible	
Staffing	Include data on Foster Care Workers (Family Resource) caseload		Feasible	
Staffing	Include data on caseloads for educational support staff – including the Regional Educational Specialists, Education Coordinators, and Education managers		Infeasible	
Staffing	Information about the race and ethnicity of DCF staff and their language abilities	A. Information about the race and ethnicity of DCF staff	Needs Additional Analysis	
		b. Information about the language abilities of DCF staff	Needs Additional Analysis	
Staffing	DCF staffing including case worker workforce education and experience levels, turn over, office moves, and lived experience	A. DCF staffing including case worker workforce education	Needs Additional Analysis	
		B. DCF staffing including case worker experience levels	Needs Additional Analysis	
		C. DCF staffing including case worker turn over	Feasible	

Table 12: Metrics Requested Stratified by Domain				
Domain	Requested Metric	Metric Components	DCF Analysis	Source (If Available)
		D. DCF staffing including case worker office moves	Feasible	
		E. DCF staffing including case worker lived experience	Infeasible	
TAY	Number and percent of TAY that have a transition plan, were involved in the development of the transition plan and are satisfied with the transition plan	A. Number and percent of TAY that have a transition plan	Infeasible	
		B. Number and percent of TAY that were involved in the development of their transition plan	Infeasible	
		C. Number and percent of TAY that are satisfied with their transition plan	Infeasible	
TAY	Transition age LGBTQ+ youth remaining in care after turning 18 (Table 37a, 37b)		Feasible	
TAY	Number of transition age youth receiving each type of service included next to figure 37	A. Number of transition age youth receiving each type of service	Feasible	
		B. Number of transition age youth receiving each type of service stratified by age (18-22)	Feasible	
TAY	Number of young adults of each age involved with DCF (to show attrition by age)		Available	Dashboard

**Commonwealth of Massachusetts**  
**Office of the Child Advocate**



**Phone**

Main Office: [\(617\) 979-8374](tel:(617)979-8374)  
Complaint Line: [\(617\) 979-8360](tel:(617)979-8360)

**Address**

One Ashburton Place, 11<sup>th</sup> Floor  
Boston, MA 02108

**Website**

<https://www.mass.gov/orgs/office-of-the-child-advocate>

**Contact**

Melissa Threadgill, *Senior Director of Policy and Implementation*  
[Melissa.threadgill@mass.gov](mailto:Melissa.threadgill@mass.gov)