

ANDREW M. CUOMO Governor SHEILA J. POOLE Commissioner

May 22, 2020

U.S. Department of Health and Human Services Administration for Children and Families Submitted via e-mail: <u>OPREinfocollection@acf.hhs.gov</u>

Re: 85 FR 17582 Proposed Information Collection Activity; Survey of the National Survey of Child and Adolescent Well-Being (NSCAW) Adopted Youth, Young Adults, and Adoptive Parents (New Collection)

To Whom This May Concern:

The New York State Office of Children and Family Services (NYS OCFS) is pleased to submit the following comments in response to the above-referenced proposed information collection activity that was published in the Federal Register, 85 FR 17582, on March 30, 2020.

NYS OCFS supports the mission of the proposed study, which seeks to examine the familial outcomes eight or more years after a child's adoption from the child welfare system. NYS OCFS actively participated in the first and second cohorts of NSCAW. The data collected from the previous surveys was directly relevant to OCFS' mission to promote the safety, permanency, and well-being of children and families. The expansion that this proposed study offers, to conduct web or telephone surveys with the adopted youth, young adults, and adults as well as adoptive parents, from the first and second cohorts would be of great interest and relevancy to NYS OCFS.

NYS OCFS wishes to share a concern in relation to the start date of the survey being conducted. As you are aware, the U.S. is currently experiencing the nationwide COVID-19 pandemic. NYS OCFS is concerned that if the survey were to be conducted now, the COVID-19 pandemic would affect the results of the survey. We believe that the quality, utility, and clarity of the information to be collected in this study would be impacted by the COIVD-19 pandemic, especially in New York State which has been greatly affected by COVID-19. NYS OCFS therefore recommends that this survey be delayed until 2021.

Nonetheless, NYS OCFS recognizes the importance of this study, as the NSCAW is the only source of nationally representative, firsthand information about the functioning and well-being, service needs, and service utilization of children and families who come to the attention of the U.S. child welfare system. As a result of participating in the previous NSCAW cohorts, the survey uncovered a vastly better understanding of what children and families involved in the child welfare system face. However, many knowledge gaps remain, and further research is needed about children who enter the child welfare system to measure quality and risk. Therefore, NYS OCFS fully supports this study and looks forward to understanding the risks and protective factors that are associated with post adoption instability and instability events that may occur in families exiting the foster care system.

In closing, thank you for the opportunity to provide these comments. We hope our comments will be thoughtfully considered and used to support federal efforts to compile information and provide guidance in

furtherance of our agencies' shared mission. Should you have any questions or need further clarification, we would be pleased to provide additional information.

Sincerely,

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Lisa Ghartey Ogundimu Deputy Commissioner Division of Child Welfare and Community Services New York State Office of Children and Family Services