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July 6, 2021

RE: Administration for Children and Families
[OMB No. 0970-0214] Proposed Information Collection Activity; Child and Family Services
Reviews

To Whom It May Concern,

ACF specifically requests comments on Child and Family Service Reviews (CFSR), specifically OMB No. 0970-0214, and (a) whether the proposed collection of information for CFSRs is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information; (c) the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Average burden Hours per response has been set by ACF at 120 hours for completing the Statewide Assessment, 1,186 hours for completing the On-site Review Instrument Stakeholder Interview Guide, and 300 hours for developing the Program Improvement Plan. The Indiana DCS submits that these burden hours are seriously underestimated. In response, Indiana respectfully submits the following comments.

- (a) whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility
- Indiana submits that the CFSR tool (OSRI) neglects to collect any information that the state deems is appropriate to understand their system. The current tool does not gather any information on how the state or jurisdiction is working from the state's perspective, only from the federal perspective. States, tribes, or jurisdictions may find more utility in being able to figure out how their system is actually working within their context, not simply within the federal compliance-based requirements.
- (b) the accuracy of the agency's estimate of the burden of the proposed collection of information
- It took Indiana two+ years of regular meetings to have the PIP approved by ACF. The CFSR Round Three took place in Indiana in the summer of 2016. Indiana received notice of the PIP approval from ACF in February 2019. A burden response



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time of 300 hours for developing the PIP is not accurate. DCS held regular meetings with ACF and contractor staff over the course of those years and DCS estimates that at least five DCS staff or stakeholders were present at each meeting and some meetings were multi-day meetings. Considering the time to write the PIP itself is an additional burden, DCS estimates that no less than 1,000 hours go into developing the PIP. This figure does not include monitoring the PIP through the (at least) eight quarters of PIP follow-up.

- Historically, ACF has required the stakeholder interviews to be in person, which takes a great deal of resources. Indiana requests that we are permitted to complete these interviews along with the CFSR review itself in a virtual environment and harness our learnings from the efficiencies found in the COVID-19 pandemic.

(c) the quality, utility, and clarity of the information to be collected

- DCS would like to suggest that states, jurisdictions, or tribes be permitted to use their own Practice Model Review tool as the CFSR tool, so long as the state tool contains all of the CFSR data elements. The spirit of the law is for states, jurisdictions, and tribes to measure and understand system functionality. While the OSRI is a helpful tool, it is inherently a compliance tool. As ACF has asked child welfare agencies to transform and re-imagine child welfare—and to the extent that states, tribes and jurisdictions have done so—is it helpful to continue to use a compliance-based tool? DCS submits there must be a better way and continued reliance on compliance-based tools is misplaced.

(d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology

- Indiana requests the continued use of context data and adding in other administrative data would be a great way to minimize the burden on the collection of information. If the context data demonstrates performance outside of the national standard in statistically significantly negative deviations, then only those related data points would be reviewed within the context of the OSRI data points.

Indiana takes our responsibility to continuously improve on behalf of children and families seriously. We relentlessly pursue perfection for Hoosiers and to that end, we ask that CFSR Round Four consider new, streamlined, and innovative ideas of how to gather data, share data, reflect on what we can improve, and then begin the task of improving. Please let us know how we can further partner with ACF to imagine an improved CFSR in Round Four!

Sincerely,



Terry Stigdon, MSN, RN
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Indiana Department of Child Services



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