

To: Office of Planning, Research, and Evaluation (OPRE), Administration for Children and Families (ACF); Department of Health and Human Services (HHS)

Re: ICR Reference Number 2023-0970-009

Wisconsin appreciates the opportunity to comment on these proposed data collection standards. The Wisconsin Department of Children and Families supports good data collection and evaluation, as well as high quality services provided to participants of government programs.

That said, Wisconsin, particularly as a state-run, county administered system, has reservations about implementing additional data collection without greater details. It's not clear why this information cannot be answered with the existing data provided within current NYTD surveys, nor has this proposal provided definitions of any of the following: the quantity or frequency of this data collection; what constitutes an "innovative method" of collection; or whether these results contribute towards an aggregated understanding of what happens nationwide, or rather targeted feedback specific for each state.

Wisconsin looks forward to receiving additional information before this is made a requirement.

Sincerely,

Wendy Henderson

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Administrator, Division of Safety and Permanence