



201 East Washington Avenue, Room E200
P.O. Box 8916
Madison, WI 53708-8916
Telephone: 608-266-8787
Fax: 608-422-7158

Governor Tony Evers
Secretary Emilie Amundson

Division of Safety and Permanence

April 1, 2019

Mary Jones, Certifying Officer
Office of Planning, Research and Evaluation
Department of Health and Human Services
Administration for Children and Families (ACF)
330 C Street SW
Washington, D.C. 20201

Ms. Jones,

Thank you for the opportunity to submit comments regarding requirements associated with reporting and data collection related to the new Title IV-E prevention and family services and program funding authorized by the new Family First Prevention Services Act (FFPSA). While our state appreciates the opportunity to provide input, it is important for our state to note the following observations:

1. This request as issued does not explicitly provide states or other interested parties with the opportunity to comment on “how” these requirements will be met, but rather requests comments related to expectations as stated in the original FFPSA legislation.
2. While Wisconsin obtained a draft spreadsheet, entitled FFPSA Data Elements, currently under development by the ACF Children’s Bureau containing specific data elements to be included as part of a state’s reporting under this FFPSA prevention program reporting requirements, the spreadsheet, which includes specific data elements, was not included for consideration as part of this request for comments.
3. The absence of this additional level of detail, and related instructions, impinges on a state’s or interested party’s ability to provide meaningful comment related to requests for comments in OMB No.: 0970-NEW as follows:
 - a. “the accuracy of the burden associated with the proposed collection of information”;
 - b. “the quality, utility, and clarity of the information to be collected,” and;
 - c. “ways to minimize the burden of information to be collected.”
4. Making the draft FFPSA Data Elements spreadsheet and reporting methodology more explicitly and publically available for comment could better support from the broadest range perspectives and would better enable comments related to 3.(a.-c.) above.

With the above noted concerns identified, Wisconsin offers the following very limited feedback in response to the draft FFPSA Data Elements spreadsheet:

- The level of granularity generally aligns with the requirements introduced in the FFPSA legislation.
- Additional detail is needed to understand what reference values would be available under “drop down menu” related data elements to assess alignment with currently available or needed changes to the state’s child welfare information system.
- Additional detail is needed regarding how multiple services for any given child, children or family members would be reported, e.g. would there be multiple records for each child and each service they receive during a given reporting period.
- A significant level of effort would be required to meet child-level detail for “cost of service.” This would require the development of new child welfare information system functionality that mirrors documentation and fiscal processing that is currently only available to support Title IV-E maintenance claiming.
- Additional information related to the frequency of and format for file submissions is required to assess this aspect of reporting burden. For example, would these elements be tied to AFCARS reporting identifying information or files?
- Given the above comments and questions posed in relationship to the draft FFPSA Data Elements spreadsheet, we believe the annual total burden hours identified by the CB to be significantly lower than would be needed to provide the data as denoted via the draft spreadsheet.

Wisconsin very much appreciates the opportunity to further advance its investments in growing a strong and effective array of prevention services and programs for the children and their families who come to the attention of our local child protective services agencies. In addition, we recognize that living into the vision and intent of FFPSA will require further support and guidance from the ACF Children’s Bureau and with our state’s key prevention stakeholders and we look forward to the work ahead.

Please feel free to contact me at devon.syrjanen@wisconsin.gov or via phone at (608) 422-6980 with any questions regarding our state’s comments to the Prevention Services Data Collection OMB No.: 0970-NEW request for comments.

Sincerely,



Devon Syrjanen, Bureau Director
Bureau of Compliance, Research, and Analytics
Division of Safety and Permanence (DSP)
Department of Children and Families (DCF)

Cc: Wendy Henderson, DSP Administrator
John Elliott, DSP Deputy Administrator
Michelle Rawlings, DSP Bureau of Safety and Well-Being Director