

March 30, 2019

United States Department of Health & Human Services
Administration for Children and Families
Children's Bureau
330 C St. SW
Washington, DC 20024

RE: Prevention Services Data Collection
OMB No: 0970-NEW

Dear Children's Bureau:

Thank you for the opportunity to provide comments on the U.S. Department of Health and Human Services Request for Public Comment on the FFPSA Prevention Services Data Collection. Casey Family Programs is the nation's largest operating foundation that focuses on safely reducing the need for foster care and building communities of hope for children and families across America. We provide ongoing strategic consultation, technical assistance, data analysis and independent research, and work in all 50 states, the District of Columbia, in two U.S. territories and with more than a dozen tribal nations to assist child welfare leaders in their efforts.

We remain unflinching in our commitment to improving the quality and type of data collected on the families we serve in child welfare. The Department requested comments on both the content of the proposed data collection and resulting utility, as well as ways to minimize the burden of the data collection. Our comments address both of those requests. In addition, we also offer recommendations for creating an incremental approach to the development of a longitudinal file structure that will build on what we currently have while working towards improvement overall.

Content and Utility of the Proposed Data Collection

With respect to prevention services, FFPSA requires states to collect and report data on each child who receives prevention services and whether the child enters foster care during the 12-month period they receive prevention services or the succeeding 12-month period. The spreadsheet provided by the Administration for Children and Families' Office of Planning, Research and Evaluation includes the bare minimum for reporting this information. However, both the content included and this approach to data collection fall short in several key areas.

Approach

Requiring states to submit an additional spreadsheet with FFPSA prevention services data, in addition to their AFCARS and NCANDS submissions, is inefficient, cumbersome, and in stark contrast to other efforts to enhance data interoperability. Expanding AFCARS to include all children who are candidates for foster care, rather than just those children who are in foster care, would be ideal. However, the structure of AFCARS as a point-in-time snapshot does not lend itself to effectively tracking outcomes for children who receive prevention services. **As a result, requiring states to submit a separate, episode-based spreadsheet to provide the necessary FFPSA prevention services data elements should be considered a short-term**

solution while simultaneously working to develop a more integrated and longitudinal data collection system that includes all children who experience child welfare. (See Recommendations for Creating a Longitudinal File Structure for more detail.)

In addition, states have shared that it will take time to work with providers to develop systems that adequately track data on the services children are receiving, and may require revamping contracts. The Children's Bureau should work with states directly to determine the best approach to collecting this information over time, as states work with their community providers to build capacity in this area.

Content

The spreadsheet provided includes several key fields pertaining to a child's experience receiving prevention services. We assume the spreadsheet is episode-based, so that it captures each unique experience for a child receiving prevention services. In addition to the detailed comments and recommendations below, we feel it is imperative that the Children's Bureau work directly with Tribes to make sure their needs are met with regard to the collection of these additional data elements.

The fields in the spreadsheet that represent new data elements are limited and will provide minimum information, making it challenging to track child, parent and family needs. Furthermore, it will be challenging to identify what works in terms of service delivery as well as determine what results in improved outcomes for children, their parents and/or their relative caregivers. Variables that better quantify service dosage beyond service start and end dates will be necessary to assess the impact of a particular service.

In addition, several fields are duplicative of data already captured in AFCARS or NCANDS. Table 1 includes our feedback on each of the requested fields, along with recommendations about what additional fields merit inclusion (in *italics*).

Table 1: Data elements requested in spreadsheet

Requested data element	Format	Comments
FY	Drop down	Unnecessary if other dates are captured
Child ID	Numeric	Should be consistent with what NCANDS, AFCARS and NYTD already capture to allow for joining across data sources. A universal ID across the data sets will be critical.
Eligible due to parenting or pregnant?	Yes/No	Include as described
Start of eligibility date	MM/DD/YYYY	If start and end date of eligibility are not synonymous with episode dates, separate fields should be added to denote the start and end date of the episode.
End of eligibility date	MM/DD/YYY	If start and end date of eligibility are not synonymous with episode dates, separate fields should be added to denote the start and end date of the episode.

Placement status at the beginning of eligibility	Drop down	Need clarity.
Did the child enter foster care at any point in the 24-month period beginning at eligibility?	Yes/No	Include as described
What was the first date of entry into foster care?	MM/DD/YYYY	Include as described
Placement status at the end of the eligibility	Drop down	Include as described. Be consistent with placement status in AFCARS, and include option for in-home placement.
Type of service	Drop down	Unclear what this field includes. At a minimum, this field should identify whether the service is parenting, mental health, or substance abuse
<i>Specific service/program offered and related details (new)</i>	<i>Drop down</i>	<i>Given the lack of clarity on the field above, it will be important to include fields that allows for more specificity in terms of the service provided to better track outcomes about specific programs/services. Also, need to provide opportunity to track multiple services and dates of those services, and information about the intensity of the service(s) provided (i.e. the number of service units provided and service unit type), as well as who the services is provided to (child, caregiver, etc.). These factors will be critical in assessing reimbursement.</i>
Service start date	MM/DD/YYYY	Include as described
Service end date	MM/DD/YYYY	Include as described
Cost of service	Numeric	Need clarity about how this will be measured. In the short-term, we recommend an average cost per child, but the Children's Bureau should work with states to establish a more effective and appropriate methodology for tracking and reimbursement.
Birthdate	MM/DD/YYYY	Include as described. Also captured in NCANDS and AFCARS.
Sex	Drop down	Include as described. Also captured in NCANDS and AFCARS.
Race/ethnicity	Drop down	Include as described. Also captured in NCANDS and AFCARS.
<i>Reason for candidacy</i>	<i>Drop down</i>	<i>Similar to removal reason fields in AFCARS</i>

Recommendations for Creating a Longitudinal File Structure

We recommend that the Children's Bureau seriously assess the most efficient and sustainable method for states and tribes to transmit data and other information. Significant improvements in technology and data management, along with major changes in federal law, have occurred since the inception of AFCARS and NCANDS. As noted, requiring states to submit a separate spreadsheet to report the necessary FFPSA prevention services data is inefficient and cumbersome, and should be considered a short-term solution while efforts are made to restructure AFCARS. The data collected must include a unique ID that allows for linking to both AFCARS and NCANDS. A revamped AFCARS should include episode-based data on all children who are candidates for foster care, as well as enhanced data elements about their receipt of services while in-home and out-of-home and data on their parents and relative caregivers. Developing a longitudinal AFCARS file with this expanded population is the most effective way to track outcomes for children who are involved with the child welfare system.

There is tremendous opportunity for states and tribes as they begin to explore and implement provisions of the Comprehensive Child Welfare Information System (CCWIS) funding environment. We encourage the Children's Bureau to consider a modernization effort that integrates the regulatory mandates of FFPSA with the flexibility of CCWIS. This would optimize technology to create and maintain a longitudinal file structure to track children, their parents, and/or relative caregivers from first allegation through prevention and in-home services to placement and return home and, when necessary, back into care and possibly adulthood. In addition, maximizing the flexibility and opportunity provided by advances in technology will effectively reduce state burden without the need to eliminate important measures for monitoring safety and assessing outcomes for children and their families.

Thank you for the opportunity to submit comments on the proposed syntax revisions. Please contact Christine Calpin, Managing Director - Public Policy, at 202-728-2001 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read 'David Sanders', is positioned above the printed name.

David Sanders
Executive Vice President
Systems Improvement