

From: [InfoCollection \(ACF\)](#)
To: [Rothstein, Jan \(ACF\)](#)
Subject: FW: Prevention Services Data Public Comments; OMB No: 0970-NE
Date: Friday, April 05, 2019 8:51:40 AM

Hi Jan,

See below. Please make sure to include this comment as an attachment with your request package and to address how you considered the comment in A8 (a response document as an attachment may also be appropriate). Let me know if you have questions,

Thanks,

Molly

Molly B. Jones

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From: Kestian, Heather H <Heather.Kestian@dcs.IN.gov>
Sent: Thursday, April 4, 2019 4:59 PM
To: InfoCollection (ACF) <infocollection@acf.hhs.gov>
Cc: Dremonas, George <George.Dremonas@dcs.IN.gov>; Miller, Eric A (DCS) <Eric.Miller@dcs.IN.gov>; Stigdon, Terry <Terry.Stigdon@dcs.IN.gov>

Subject: Prevention Services Data Public Comments; OMB No: 0970–NE

As part of OMB No 0970-NE, the Department specifically requests comments on:

- (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;
- (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.

Indiana would like to submit the following questions and comments on the Prevention Services Data Request for Public Comments.

Indiana currently has access to the requested data points. However, the current publication of the requirements for reporting the specific data points does not specify how the required data points will be collected. As such, will these new data points be required as part of AFCARS? Or, some other reporting process?

Additionally, there are several reporting systems--AFCARS, NCANDS, OSRI, etc. Is there any consideration for combining data, requirements, and reporting structures so that data can be analyzed more efficiently as it relates to time and costs associated with the reporting process? Do the existing requests for data submissions collect sufficient data points that can be used to accurately inform child welfare outcomes, identify, and understand trends that inform policy and practice improvement initiatives? Now is the perfect time to modernize our measurement system as there is momentum within child welfare at the national, state, and local level to transform child welfare to improve outcomes for children and families. Indiana suggests that this momentum extend to data collection, analysis and reporting so that we can make data-driven decisions related to policies, services, and placements through a public health lens.

Heather H. Kestian

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