



Doug Burgum, Governor
Christopher Jones, Executive Director

March 25, 2019

Administration for Children and Families
Office of Planning, Research and Evaluation
330 C Street SW
Washington, DC 20201

ATTN: ACF Reports Clearance Officer

REGARDING: Prevention Services Data Collection (OMB No.: 0970-NEW)

Regarding the comment request for Prevention Services Data Collection (OMB No.: 0970-NEW), the North Dakota Department of Human Services' Children and Family Services Division is submitting the following comments:

REQUESTED INFORMATION: 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;

COMMENT: In order to monitor outcomes when implementing prevention services, North Dakota will need to track specific metrics including total expenditures, service duration, placement status, and foster care candidacy. While the information will have practical utility for North Dakota, modifying the current child welfare information system and capturing information from other state data systems will be onerous. For instance, North Dakota's CWIS does not communicate with the behavioral health information system. A bridge would need to be created, requiring significant time and resources to accomplish, or information would need to be collected by hand. Either method will be quite burdensome during the initial phase of data collection.

REQUESTED INFORMATION: the accuracy of the agency's estimate of the burden of the proposed collection of information.

COMMENT: Because of the difficulty with CWIS modifications to allow for the collection of the requested data, it is believed the estimate of the burden of the proposed collection of information is grossly underestimated. In addition, the administration of the Title IV-E funding will create an additional burden for the State. The current payment system for behavioral health services is not linked to

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the child welfare payment system and will require significant system modification to handle provider billing and payment for Title IV-E dollars.

REQUESTED INFORMATION: The quality, utility, and clarity of the information to be collected.

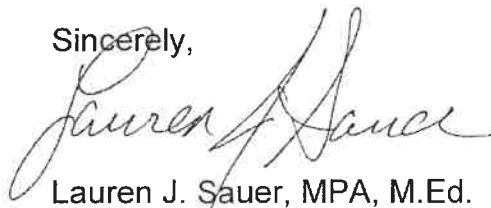
COMMENT: North Dakota does not have concerns with the information to be collected.

REQUESTED INFORMATION: 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.

COMMENT: In order to minimize the burden, North Dakota would need to implement a new CWIS that would allow for the collection of the required information with minimal modification to its coding. At the current time, North Dakota is unable to implement a new system and will need to heavily modify its current system to collect the needed information.

Thank you for allowing us to comment on the proposed rule.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lauren J. Sauer".

Lauren J. Sauer, MPA, M.Ed.
Assistant Director