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April 3, 2019

Administration for Children and Families
Office of Planning, Research and Evaluation
330 C Street SW
Washington, DC 20201
Attn: ACF Reports Clearance Officer

Subject: Comments on Proposed Prevention Services Data Collection -- OMB No: 0970-NEW

Thank you for the opportunity to provide comments in response to the Notice for Proposed Information Collection Activity pertaining to prevention services under the Family First Prevention Services Act (FFPSA), published on February 4, 2019 in the Federal Register, Volume 84, Number 23. These comments are being submitted on behalf of the State of Utah Division of Child and Family Services (DCFS) within the Department of Human Services (DHS). DCFS is the state agency that administers Title IV-E and Title IV-B child welfare services and as such will be operating Prevention Services under the FFPSA. DCFS respectfully submits the following comments for your consideration.

Item (a) Information Necessary for the Proper Performance of the Functions of the Agency

DCFS recognizes the importance of data collection and reporting for proper administration and accountability in child welfare. We also recognize that the FFPSA specifies data elements that must be reported for children or on behalf of children that receive prevention services under the Act. However, data collection and reporting can create undue burden for child welfare jurisdictions without corresponding benefit. We encourage the Children's Bureau to take the least burdensome approach possible in the interpretation and implementation of the prevention data reporting required under the law and to allow a generous period of time for child welfare jurisdictions to develop capacity before reporting is required. We also recommend that child welfare jurisdictions have the opportunity to serve as stakeholders as specific data reporting processes and items are identified, and that all child welfare jurisdictions have the opportunity to review and provide comments before prevention services data reporting is finalized by the Children's Bureau.

Generally, child-specific data is less helpful than aggregate data when looking at the system as a whole and analyzing services, programs and overall outcomes for children and families. To the extent that the law may allow, reporting of aggregate data rather than individual child data may have more practical

utility for child welfare jurisdictions and for the Federal government. For example, information regarding service, cost, and duration will be most useful for the agency in aggregate form.

Where data must be child specific, limiting reporting of data elements to that specified in the law is preferred, though it is understandable that limited demographic information may be helpful to an overall system analysis and for tracking of the child's placement status over time.

Item (b) Estimation of the Burden of the Proposed Collection

We believe it is premature to try to estimate the average or total annual burden hours for this data collection activity because the specific reporting elements are not clear enough to determine time needed to collect or report the data.

Item (c) Quality, Utility and Clarity

Quality of data may be difficult to attain for some of the reporting requirements, depending on the reporting time period and frequency that is implemented. For example, the child-specific reporting requirements pertain to an episode of a child qualifying as a prevention services foster care candidate. If data is reported point in time, such as semi-annually with AFCARS, the episodic nature of the data cannot be captured. It would make more sense to identify a period of time, such as a Federal fiscal year, for jurisdictions to report child-specific episodic data for any child for whom the candidate episode ended during the FY. This would enable the jurisdiction to report the placement status at the start and end of the candidate period, and then report again at the end of the following fiscal year, regarding the placement status at 24 months after the candidate determination was made.

Duration of service is another data element that would not be accurately captured with a periodic report such as AFCARS. This will also better be reflected after the prevention episode is completed.

One other quality challenge contained in the law is the requirement to report specific services provided "for or on behalf of" the child who is the prevention candidate. Since the services may be provided to the child's parent or kin caregiver, tracking payments back to the child may not be possible in a jurisdiction's payment system. Also, in situations where multiple children in a household are identified as prevention services candidates for foster care and the service is provided only to a parent or kin caregiver, it is unclear how the specific services, costs, and duration of services would be reported "for or on behalf of" a single candidate child or divided among the candidate children in the household.

Additional clarification is needed regarding the reporting expectation for specific services and programs. Would each distinct service or program (such as each mental health treatment modality) need to be reported or can each distinct service or program be combined and reported by primary categories of mental health, substance use disorder, or in-home parent skills based training services? Is the duration of the services a retrospective review and only reported after the service has ended or after the candidate episode has ended? How will the duration of the service be reported if it overlaps two 12 month prevention episodes?

It is also unclear if the same information collection and reporting requirements apply to pregnant or parenting foster youth who are receiving prevention services. If so, additional clarification would be beneficial regarding how the data elements apply to the foster child and the foster child's baby and if the baby is considered a foster care candidate. For example, how would we report a prevention foster care candidate's placement status at the beginning of a case for a pregnant foster child? At the end of the prevention services, do we report on the foster child's placement and/or the foster child's baby (prevention foster care candidate's) placement status?

We also request clarification regarding how soon after a state's prevention plan is approved before the state is required to submit their initial prevention report. We recommend the state have at least 12 months of an approved prevention plan before being required to submit their initial prevention plan data report.

Item (d) Ways to Minimize the Burden

If possible, to minimize reporting burden, it would be helpful if the child-specific data could be tied to factors that literally are specific to the child, such as the time period the child is identified as a candidate and the placement status at 12 months and 24 month. Then if the service-specific data could be reported by service with aggregate data on clients served, it would be more feasible to report and more accurate and meaningful data.

It would also reduce reporting burden for jurisdictions if the services reported could be reported in the aggregate, or at least by category rather than each individual program (e.g., report as mental health rather than TF-CBT). Reporting each individual service or program for each individual child, multiplied by all of the services that eventually will be part of jurisdictions' prevention service array and for or on behalf of all children, will require reporting of an excessive amount of data, without improving utility of the data. While the intent may be to have the capacity to analyze data by specific service and the corresponding child's placement outcome, it's also likely that a child or the child's family may receive multiple services under the prevention service array and it wouldn't be possible to accurately conclude based on this type of data that remaining at home or having a subsequent foster care placement was due only to the provision of a specific service.

In addition, we recommend that the Children's Bureau establish defined data fields so the report can be programmed and auto generated. For example, when reporting whether the child entered foster care during the subsequent 12 month period, the option should be yes or no rather than a placement type if not in foster care. We encourage states and other child welfare jurisdictions be allowed to have input into the proposed reporting elements, how they are defined, how they will be reported, and the frequency of reporting. Also, the law did not require the reporting of specific demographic information for each child. We recommend eliminating or limiting the request for demographic information for each individual child, and allowing states input if additional demographic elements are considered.

Furthermore, we recommend that data be reported no more frequently than once per year to help minimize the burden on states.

Thank you for your consideration of our recommendations. If you have questions or need further information, please contact Cosette Mills, Division of Child and Family Services, at cwmills@utah.gov or 801-538-4058.

Sincerely,



Diane Moore, Director
Division of Child and Family Services

cc: Ann Silverberg Williamson, Executive Director
Department of Human Services