

March 27, 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:

The State of Missouri Children's Division would like to 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.

With respect to prevention services and the state reporting requirements, we had some questions and concerns in several areas. We feel we would need more clarification regarding several items beginning with clarity on child specific vs aggregate data in each reporting area. In reference to the FFPSA Draft Elements Worksheet it appears the requirements would be all child specific. If these will be child specific, we identified an issue when there are multiple children in a family that are all candidates for removal, we know our system is currently only capable of tracking the single service provided, in most instances, for the entire family unit and not broken down per individual child. We are exploring ways to break that out to a "per child" report but until system enhancements are made we would be looking at individual man hours to work through reports and pull out the information which is a time/labor constraint. We are hopeful to gain further clarity on what services will qualify as "prevention services" beyond what is currently under review in the Clearing House. We are also concerned that we are only capable of tracking very specific data items on children that are in our custody and we may require further system enhancements in order to begin tracking additional information on those children that remain in the home under Family Centered Services (FCS) that would qualify for candidacy

Overall, we noted that many of the same items are tracked in AFCARS submissions; however the AFCARS data reports only children in our custody. Currently, Missouri lacks the ability to track those same items with children not in custody, as we mentioned above. It's also not simply a matter of duplicating the AFCARS report because AFCARS submissions are based upon point-in-time data vs a longitudinal report. We would further like to see details around the reporting format and consistency of the format with current reporting methods. If states continue to report on this separately while also continuing to report on AFCARS & NCANDS, this will only continue to increase the burden on states with additional reporting of duplicate information while adding to both time & labor costs. We are hopeful this could somehow be streamlined into one report with the use of technology in the near future and we are aware preliminary meetings have been held through Casey Family Programs to develop suggestions that would move us towards this innovative idea.

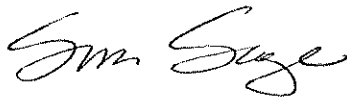
Missouri has one final concern surrounding the alignment between the reporting requirements & the CB496 requirements. The only lines that appear to match up equivalently are the reporting categories

of the total expenditures for each service/program provided vs CB496 Lines 38 & 39 of Prevention services Provision-Well Supported Practices & Other Qualifying Practices.

At this time Missouri feels confident we are on the right track with understanding and defining candidacy and we appreciated support from our Federal partners in a thorough power point presentation and discussion. The last piece that we would like to comment on would be around cost projections and total burden but we currently do not have enough financial predictive information around the fiscal activities that it would include such as system enhancements or upgrades and additional labor costs.

Again, we thank you for the opportunity to submit comments on the Prevention Services Data Collection techniques. Please contact Susan Savage, Deputy Director of Planning and Performance Management, at 573-751-2502 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan Savage", written in a cursive style.

Susan Savage