

From: [Michele Spainhower](#)
To: [HRSA Paperwork](#)
Subject: Public Comment: OMB No. 0915-0338-Revision
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Hello, Please accept the following comments for: Agency Information Collection Activities:
Proposed Collection: Public Comment Request; Information Collection Request Title: Healthy Start Evaluation and Quality Improvement, OMB No. 0915-0338-Revision. Thank you.
Is the intent of the Mandatory Questionnaires to collect snippets of data (just a survey) or the full data needed for HRSA Performance Measure reporting? If the intent is to collect the full data needed for HRSA Performance Measure reporting, the following are points to be addressed.

Background Mandatory Questions:

1. Q. 3: Have you been with the Healthy Start program less than a month or more than a month....Including periods of time that happened in the past
 - Does this time frame include if a participant was previously in the program two years ago and is back with a subsequent pregnancy?
 - As an alternative and providing less room for interpretation, please consider asking for the Date of Enrollment in the program.
2. Will the Background Mandatory Questionnaire be completed annually, to meet the definition of those performance that require the information based on the reporting period? The tool does not make this distinction, in its current state.
3. **WMH4-B** ~ Numerator: Number of women participants who screened positive for depression during the reporting period and received a subsequent referral for follow-up services.
 - The Background Questionnaire provides the PHQ-2 for screening. However, if the participant screens positive, it does not ask if the participant was referred for services.

Prenatal Mandatory Questions:

1. **WMH1** ~ Denominator: Pregnant program participants who were enrolled prenatally, prior to their second trimester of pregnancy.
 - Q. 2 asks how many weeks or months pregnant the participant was when they had their first visit for prenatal care, however, there is no where that asks when the participant was enrolled nor asks for their EDD to determine if they were enrolled in the Healthy Start program prior to their second trimester.
2. **LC2** ~ Numerator: Number of Healthy Start prenatal women participants who abstained from using any tobacco products during the last 3 months of pregnancy. Denominator: Total number of Healthy Start prenatal women participants who were enrolled at least 90 days before delivery.
 - Q. 3 asks if the participant if they currently smoke. Again, with the enrollment date, a question for EDD, and adding a question in the Pregnancy Follow-Up section asking if the participant smoked in the last 3 months of pregnancy, WMH1 could be measured.

Children Mandatory Questions:

1. **HS03** ~ Numerator: Number of healthy start (HS) women participants whose pregnancy during the reporting period was conceived within 18 months of the previous live birth. Denominator: Total number of women HS participants enrolled before the current pregnancy in the reporting period who had a prior pregnancy that ended in live birth.
 - Q. 3 asks if there is at least an 18-month interval between the birth dates of Child 1 and Child 2 and Q. 4 asks if there is at least an 18-month interval between the estimated due date for any current pregnancy and the most recent live birth for this participant. However, these questions do not delineate if the participant was enrolled prior to the most current pregnancy.

2. **WMH2** ~ Numerator: Women program participants who enrolled prenatally or within 30 days after delivery and received a postpartum visit between 4-6 weeks after delivery. Denominator: Women program participants who enrolled prenatally or within 30 days after delivery during the reporting period.
 - Q. 4 asks if the participant had a postpartum visit four to six weeks after **this** baby was born. The questionnaire does not delineate if this person was a participant and this child was born in the program and/or if the participant enrolled within 30 days of the birth of this child.
3. **Pediatric Performance Measures:** The Children Questionnaire gathers information for two children. It then states: If you have more than one child who meets those criteria, we ask you to focus only on the **OLDEST** of these children. All remaining questions ask about that child only. This child will be the **Target Child** of these questions.
 - This tool will not collect the information, needed for performance measure reporting, for **all** pediatric participants enrolled in the healthy start program.
 - Q. 3 asks about baby's birthweight and does not delineate if the baby was born into the program. This question also does not differentiate between low and very low birth weight.
 - Q. 6 asks about substance use during the pregnancy. Is this to collect background information that may affect the baby's growth/development or is this to be used for reporting? If for reporting, this does not delineate if mom's pregnancy occurred while enrolled in the Healthy Start program.
 - **PIH2-A** ~ Numerator: Total number of HS child participants aged <12 months whose parent was enrolled prenatally or at the time of delivery who were ever breastfed or fed pumped breast milk to their infant. Denominator: Total number of HS child participants aged <12 months whose parent was enrolled prenatally or at the time of delivery
 - Q. 7 asks if the baby was fed breastmilk after the deliver.....however, does not delineate if the participant was enrolled prenatally or at the time of delivery.
 - **PIH2-B** ~ Numerator: Total number of HS child participants age 6 through 11 months whose parent was enrolled prenatally or at the time of delivery that were breastfed or were fed pumped breast milk in any amount at 6 months of age. Denominator: Total number of HS child participants age 6 through 11 months whose parent was enrolled prenatally or at the time of delivery.
 - Q. 8 looks at duration of breastfeeding.....however, does not delineate if the participant was enrolled prenatally or at the time of delivery.
4. It would be useful if the Children Tool could be split. The woman questions would be listed on a Postpartum/ICC tool and the Children tool would then be used to collect the information for each Pediatric participant and pediatric participants would subsequently be uploaded to HSMED.
5. There is no measurement of infant death, once baby is born, on the Children Questionnaire.

Michele Spainhower
Senior Analyst/Trainer

ChallengerSoft Client Services

Michele.Spainhower@challengersoft.com

Work:(281)499-0095 ext. 106

<http://www.challengersoft.com/>