

**Public Comment #1: Comment considered; no revisions needed.**

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

**Attention:** OPRE Reports Clearance Officer

RE: 84 FR 1740  
Status: Notice

I am writing regarding Federal Registrar 2019-00942 dated February 05, 2019 Document Number 2019-00942, named Proposed Information Collection Activity: Assessing Models of Coordinated Services for Low Income Children and their Families (AMCS) (New Collection) (Federal Register, 2019). This Notice is Under the Federal Office of Planning, Research and Evaluation; Administration for Children and Families.

There are two things I like about this Notice and what it aims to accomplish. One it speaks to the heart of social work values in that it seeks to ensure social justice for a vulnerable population and service they receive. The population this Notice aims at ensuring effective and efficient service is provided are those children and families who are low income that receive child care services (Federal Register, 2019). Even the method used to collect data is at the heart of a type of evaluation used by social workers to measure effective and outcome of services.

The Administration of Children and Families is a division of Health and Human Services whose primary goal is to promote the economic and social well-being of families, children, individuals and communities(www.acft.hhs.gov,nd). This is done by funding, partnering, training and technical assistant of agency and or/person in communities who offer services to children and families (U.S. Department of Health and Human Services, 2019). This Notice seeks to collect data on how low-income families who receive early care, education, economic and health services are handled or coordinated. In addition are there barriers to them receiving these services and is there clear partnership established between those giving and receiving the services (Federal Register, 2019)

To assess the Models of Coordinated Services the ACF is seeking comments on how they plan to go about collecting data for this future study. After reading how their plan to go about collecting data from different program that provide the specific types of services, I can only say I agree with the method. It's my hope they give social work students a chance to get paid by helping with this future study. The data collection will involve six program site visits. Once these sites are identified the plan is to conduct interviews on every level of the selected agencies including the top person in the program to the front-line staff. More importantly the parents involved in the program will be interviewed and given a chance to discuss what they think about person working there, services they receive, pros and cons of program, and does the program work for them.

In my professional and opinion, to be able to truly assess is a program working for those receiving the services, everyone from the agency top leader to the parents receiving the services need

to have a fair say. Too many times when a program is being evaluated the one's receiving the services get left out of the process. I believe the parents or those receiving the services are the most important persons to really learn about a program efficiency and effectiveness. The parents who are not able to be interviewed face to face, need to give the option of telephone interviews or some alternative automated way. If information is collected through the automated way it needs to be a simple and easy way of collecting information. This may require a face to face explanation or training on how to reach whatever website or automated technique of collecting data. I will go even as far as suggesting home visits to parents receiving the services. All in all, I agree with this Notice proposing on ways of collecting data to assess models of coordinated services for low income children and their families.

#### Reference

Federal Register, 2019. *Proposed Information Collection Activity; Assessing Models of Coordinated Services for Low-Income Children and Their Families (AMCS)*. Administration for Children and Families. Retrieved on March 2, 2019 from:

[https://www.federalregister.gov/documents/2019/02/05/2019-00942/proposed-information-collection-activity-assessing-models-of-coordinated-services-for-low-income.](https://www.federalregister.gov/documents/2019/02/05/2019-00942/proposed-information-collection-activity-assessing-models-of-coordinated-services-for-low-income)

U.S. Department of Health and Human Services. (2019, March 2). Retrieved from Administration for Children and Families: [www.acf.hhs.gov](http://www.acf.hhs.gov)

#### **Public Comment #2: Comment considered; further detail on what information would be collected and how that information would be used was included in the OMB Supporting Statements.**

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Response to Public Notice 2019-00942

In the public notice, *Assessing Models of Coordinated Services for Low-Income Children and their Families (2019-00942)*, the goal is to find whether public agencies are providing quality services to families in need. If an agency is not providing those services efficiently then how can it be improved. Each state has multiple agencies to help those in lower income situations and usually has independent agencies to assist families further. That is the case in the state of Tennessee, and it is further broken down by major cities, such as Memphis and Nashville. This study will ultimately be beneficial for those it will impact. However, there needs to be more detail given about the specific information being assessed during site visits and focus groups.

The notice appears to be a good plan to get more information about how low-income families are being assisted. There is little information given about what aspect of the low-income family's lives will be assessed. This could range from education, employment, access to health care to access to food assistance. This notice needs to have more detail or explanation of what it hopes to achieve. There are multiple agencies in each major city in each state that performs different services for low income families. For example, in Memphis, Tennessee, there are programs that specifically assist low-income families with receiving assistance to keep the lights on in their home. There are agencies that help the children of low-income families receive counseling where necessary and assistance with education. The WIN Job Center specifically helps individuals who are looking for a job that are either on unemployment or do not have the education or training for many jobs. The notice should explain if it is going to visit each of these programs to assess how they work with the government or if it will only work on a specific goal.

During the site visits that the notice mentions there will be interviews with employees of the agency. The interviews are to assess if the employees feel there is a better way that the agency can work with the government to help low-income families. This and the focus groups with parents involved with the program is a very good idea because the voices of the agency staff and the actual families is not always heard. More information would need to be given to encourage participation by staff and the families involved. Sometimes research can seem intimidating and daunting to low-income families because they do not understand where the information is going. There are families that do not trust the government and would not want to participate in the study due to feeling that their information will be misused. This could possibly be an issue with staff that is interviewed if they are feeling pressured by upper management to make the agency look good for the study. The study will need to be very transparent with the families participating.

Overall, this study will be beneficial for low-income families and the agency involved. The notice needs to be more specific about what aspect will be studied, whether it is education, employment or other services. More information should be given to the agencies to encourage participation without pressure from upper management. There needs to be more detail given to explain exactly what information will be collected from the families and what will be done with that information.

**Public Comment #3: Comment considered; no revisions made as a result.**

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**From:** Jean Public <[jeanpublic1@yahoo.com](mailto:jeanpublic1@yahoo.com)>

**Sent:** Tuesday, February 5, 2019 2:17 PM

**To:** ACF OPREInfoCollection <[OPREInfoCollection@ACF.hhs.gov](mailto:OPREInfoCollection@ACF.hhs.gov)>; [media@cagw.org](mailto:media@cagw.org)

**Subject:** Fw: public comment on federal register tranference of all costs of raisnig a child to your neighbor proposal - it hurts responsible citizens

firstly, all illegal immigrant children should be dropped from this program immediately. if they are in the USA illegally, they need to be deported to their own country to let their own country support them and educate them. they do not belong here if they sneaked into this country. the taxpayers of this country are being ripped off being asked to pay for all the world's children. we cannot afford it. our own children are in fact suffering from the way every cent is taken from American workers for these illegal immigrant leaches.

secondly I am not in favor of this outrageous federal program. the states are doing an adequate job and should be allowed to continue. their work is in line with what each state's taxpayers/citizens want and such work should be in accordance with what the state's taxpayers/citizens want to spend. this outlandish federal agency will consider the tax dollars never enough. American taxpayers are being financially assaulted by the fat cat bureaucracy in Washington DC with their high salary levels which do not exist in most parts of this country, where people are having a hard time staying alive.

I am not in favor of this wasteful exercise. this agency deserves a grade of F minus for its work. federal fat cat bureaucracies like this one should be defunded to a zero budget and shut down. this comment is for the public record. please receipt. Jean Publice Jean [public1@yahoo.com](mailto:public1@yahoo.com)