



COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF HUMAN SERVICES

August 8, 2025

Department of Health and Human Services
Administration for Children and Families
330 C Street SW
Washington, D.C. 20201

Re: Submission for Office of Management and Budget Review; Plan for Foster Care and Adoption Assistance – Title IV-E

Dear Administration for Children and Youth,

The Commonwealth of Pennsylvania Department of Human Services (DHS) appreciates the opportunity to comment on the revisions to the Plan of Foster Care and Adoption Assistance. We offer the following comments on these revisions.

Prior submissions of Pennsylvania's Title-IV-E State Plan required over a year of planning. This included gathering information related to families with lived experience, communities, providers and other pertinent children and youth agencies. The scope of the state plan extension, including the updates, requires significant efforts and collaboration across many different entities.

A cohesive Title IV-E State Plan document has always been considered necessary and impactful to DHS, as it provides a formalized plan and common ground understanding for federal, state, and county entities. This is especially critical for states with a state-supervised-county-administrator structure, like Pennsylvania.

Time Burden of Proposed Collection of Information

The information requested about burden hours and the amount of time necessary to complete the Title IV-E State Plan is not a simple or exact number to predict. The accuracy of a time burden estimate would be an additional burden on a system that is already stretched thin due to a limited number of commonwealth and contracted staff available to meet numerous competing priorities. Submission of an inaccurate estimate may contribute to skewed data and result in increased burden and time.

OFFICE OF THE SECRETARY

Many offices within DHS are required to work together to update the required provisions of the Title IV-E State Plan, as it requires an assessment of existing statutes and regulations, existing policy analyses, legal interpretations and when necessary, development of new policy to be gathered and disseminated across stakeholder groups and pertinent staff. While there are processes for staff time studies, it would not fully capture the burden of time necessary to complete the Title IV-E State Plan, as much of the work need would be absorbed over a period of time through the use of our limited number staff and contractors while balancing with other competing priorities.

Quality, Utility, and Clarity of the Information to be Collected

Since the plan attachment copies language straight from the federal regulations, the plan's accuracy is high. The citations made to approved plans must be verified, as such any approved plan proves a valuable resource for policy consultation.

Ways to Minimize the Burden of Collection of Information

A more formalized formatting body for the state plan pieces, or any relevant document, would greatly assist in the utilization and understanding of the state plan. Additionally, to better estimate burden hours, a list of specific metrics or requirements and the scope those requirements entail would assist DHS in estimating the amount of time and resources that would need to be dedicated.

Pennsylvania does not currently have a statewide Child Welfare Information System to support any automated collection of data.

Thank you for the opportunity to provide comments on these revisions.

Sincerely,



Valerie A. Arkoosh, MD, MPH
Secretary