

June 13, 2018

Kathleen McHugh
United States Department of Health and Human Services
Administration for Children and Families
Director, Policy Division
330 C St. SW
Washington, D.C. 20024

RE: Advance notice of proposed rulemaking
Docket Number: ACF-2018-0003
Docket Name: AFCARS
Docket RIN: 0970-AC72

Dear Ms. McHugh:

Thank you for the opportunity to provide comments on the U.S. Department of Health and Human Services Notice of Proposed Rule Making RIN 0970-AC72. Casey Family Programs is the nation's largest operating foundation that focuses on safely reducing the need for foster care and building communities of hope for children and families across America. We provide ongoing strategic consultation, technical assistance, data analysis and independent research, and work in all 50 states, the District of Columbia, in two U.S. territories and with more than a dozen tribal nations to assist child welfare leaders in their efforts.

We commented previously on these rules and remain unflinching in our commitment to improving the quality and type of data collected on the families we serve in child welfare. The Adoption and Foster Care Analysis and Reporting System (AFCARS) is the only national tool for tracking children in foster care and monitoring outcomes such as safety, permanency, time to reunification and increases and decreases in the number of children in out-of-home care. It allows ACF to track Title IV-E eligible children and to monitor capacity and outcomes across states. Significant improvements in technology and data management, along with major changes in federal law, have occurred since the inception of AFCARS. Revisiting the reports' structure and content makes sense.

The final rule included provisions on the reporting population, file structure and data elements. While the current request from ACF is primarily regarding data elements, we will comment on all three areas, as all are equally important to children and youth, and to the child welfare agency serving them. While we fully appreciate the administrative burden associated with this regulatory activity, we encourage the Administration for Children and Families to maximize the flexibility and opportunity provided by advances in technology to reduce state burden rather than eliminating important measures for monitoring child safety and ensuring that caring adults raise children in families.

Reporting Populations

The final rule included two reporting populations: children in out-of-home care and those receiving adoption or guardianship assistance payments. We support collecting data on both of these populations.

In addition, with the passage of the Family First Prevention Services Act (FFPSA), it will be necessary for ACF to develop or adjust existing data elements for the new population of children and families that will be served under this legislation — particularly those children with open cases, as well as their parents or kinship caregivers served in their home with prevention services.

File Structure

Significant changes are underway in child welfare technology as states begin to explore and implement provisions of the Comprehensive Child Welfare Information System (CCWIS) funding environment. As noted above, passage of the FFPSA also will require collection of data when cases are opened, not only at the point of placement out of home. Not only will additional and/or different data be required, but more children will be subject to reporting as IV-E supported services begin earlier in a case and are provided to more children and families.

We recognize that the Children's Bureau is currently considering a delay in the compliance and effective dates of implementing the 2016 final rule. The idea of states continually appending an incredibly large rectangular file with additional data elements and ongoing tracking of post-permanency assistance recipients is difficult, so we appreciate your thoughtful consideration of how best to approach this. At the same time, the use of data for policy and planning is growing at an exponential rate, and we can expect the same trends in child welfare as statutory requirements and public expectations for integrated systems and services continue to grow.

We recommend that the Children's Bureau seriously assess the most efficient and sustainable method for states and tribes to transmit data and other information. The notion of a flat file transfer every six months was conceived of more than two decades ago. With advances in technology, this is inefficient. We encourage the Children's Bureau to explore alternate methods of data submission, such as monthly (or even weekly) automated data transfers. Data storage could be cloud based with system components modularized.

Data Elements

We are keenly aware of the need to balance the increasing need for timely and relevant data for the appropriate oversight and monitoring of these children with the considerable burden tied to its collection. Further, statutory requirements tied to the Fostering Connections to Success and Increasing Adoptions Act of 2008, as well as the Preventing Sex Trafficking and Strengthening Families Act, have significantly expanded

the scope of AFCARS for the first time since its inception in 1998. Older youth who exit care without permanency, as well as child victims of sex crimes, are important subgroups warranting oversight. In addition, the data elements identified in the final rule published in December 2016, protected the rights of Indian children placed out of home by tracking state compliance with the provisions of the Indian Child Welfare Act (ICWA). Additional data elements approved in the final rule will be useful for service provision and research purposes, including detail on sibling placement and sexual orientation. Further, we expect that the FFPSA will further expand the scope of AFCARS.

Rather than reduce the number of data elements, we strongly encourage the Children's Bureau to modernize their approach to data transfer and structure as well as the electronic retrieval and linking of information from other federal data repositories. The burden for electronic transfer and file linkage is on ACF; states should be mandated to provide information on children in the care of the state Title IV-E agency (whether in placement or in their own homes), but should not be responsible for conducting linkages with Medicaid, behavioral health or education. We encourage the Children's Bureau to consider a modernization effort that integrates the regulatory mandates of FFPSA with the flexibility of CCWIS. This would optimize technology to create and maintain a longitudinal file structure to track children from first allegation through prevention and in-home services to placement and return home and, when necessary, back into care and possibly to adulthood. Beginning and end dates of in-home spells will be important.

We expect that, for many data elements over time, manual data entry will be replaced by elements that are automatically pre-populated, reducing the burden of data collection. However, that capacity must be built rail-by-rail, optimizing opportunities for trusted relationships across state agencies that lead to mutually beneficial information sharing. We see numerous fields in the current and proposed list of AFCARS data elements with potential for electronic data transfer.

Table 1 lists approved data elements, noting whether the element should be kept and if it lends itself to electronic data transfer. We also recommend federal technical assistance to accelerate with modernization efforts, in coordination with CCWIS implementation. Further, we recommend that decisions around elimination of data elements tied to ICWA implementation, if any, be decided in consultation with tribes and states.

Thank you for the opportunity to submit comments on this important regulation. Please contact Christine Calpin, Managing Director - Public Policy, at 202-728-2001 if you have any questions.

Sincerely,

David Sanders
Executive Vice President

Systems Improvement

AFCARS Data Elements Side-by-Side Comparison with Recommendation		
K = Keep		
R = Remove		
E = Electronic Exchange		
AFCARS Out-of-Home Care Data Elements as Published in the Final Rule Issued 12/14/16 (81 FR 90524) (1355.44)	AFCARS Foster Care and Adoption Data Elements as Published in the Appendix to 45 CFR part 1355	Recommendation
1. IV-E Agency	1. IV-E Agency	K
2. Report date	2. Report date	K
3. Local agency	3. Local agency	K
4. Child record number	4. Child's Record number	K
(b) Child information	Child's Demographic Information	
5. (b.1) Child's date of birth	5. Date of birth	K
6. (b.2.i) Child's gender	7. Child's Sex	K
7. (b.2.ii) Child's sexual orientation	N/A not in the current AFCARS collection	R
8 – 14. (b.3) Reason to know a child is an "Indian Child" as defined in the Indian Child Welfare Act.	N/A not in the current AFCARS collection	K
15 - 17. (b.4) Application of ICWA.	N/A not in the current AFCARS collection	K
18 – 20. (b.5) Court determination that ICWA applies	N/A not in the current AFCARS collection	K
21 – 23. (b.6) Notification - ICWA	N/A not in the current AFCARS collection	K
24. (b.7) Request to transfer to tribal court - ICWA	N/A not in the current AFCARS collection	K
25 - 28. (b.8) Denial of transfer - ICWA	N/A not in the current AFCARS collection	K
29 - 36. (b.9) Child's race	8. Child's Race	K
37. (b.10) Hispanic/Latino origin	9. Child's Hispanic or Latino Ethnicity	K

38. (b.11.i) Health assessment	10. Child diagnosed with disability and response options of yes, no, not yet determined.	K
39. (b.11.ii) Date of health assessment	N/A not in the current AFCARS collection	E
40. (b.12) Timely Health Assessment	N/A not in the current AFCARS collection	E
41. (b.13) Health, behavioral or mental health conditions	10. Has the Child Been Clinically Diagnosed with a Disability(ies)?	E
42. (b.13.i) Intellectual disability	11. Mental Retardation	E
43. (b.13.ii) Autism spectrum disorder	15 Other Medically Diagnosed Conditions Requiring Special Care	E
44. (b.13.iii) Visual impairment and blindness	12 Visually or Hearing Impaired	E
45. (b.13.iv) Hearing impairment and deafness	12 Visually or Hearing Impaired	E
46. (b.13.v) Orthopedic impairment or other physical condition	13. Physically Disabled	E
47. (b.13.vi) Mental/emotional disorders	14. Emotionally Disturbed (DSM- IV)	E
48. (b.13.vii) Attention deficit hyperactivity disorder.	14. Emotionally Disturbed (DSM- IV)	E
49. (b.13.viii) Serious mental disorders	14. Emotionally Disturbed (DSM- IV)	E
50. (b.13.ix) Developmental delay	N/A not in the current AFCARS collection	E
51. (b.13.x) Developmental disability	N/A not in the current AFCARS collection	E
52. (b.13.xi) Other diagnosed condition	15. Other Medically Diagnosed Conditions Requiring Special Care	E
53. (b.14) School enrollment	N/A not in the current AFCARS collection	E
54. (b.15) Educational level	N/A not in the current AFCARS collection	E
55. (b.16) Educational stability	N/A not in the current AFCARS collection	E
56. (b.16.i) Proximity	N/A not in the current AFCARS collection	E
57. (b.16.ii) District/zoning rules	N/A not in the current AFCARS collection	E
58. (b.16.iii) Residential facility	N/A not in the current AFCARS collection	E

59. (b.16.iv) Services/programs	N/A not in the current AFCARS collection	E
60. (b.16.v) Child request	N/A not in the current AFCARS collection	E
61. (b.16.vi) Parent/Legal Guardian request	N/A not in the current AFCARS collection	E
62. (b.16.vii) Other	N/A not in the current AFCARS collection	E
63. (b.17.i) Pregnant as of the end of the report period	N/A not in the current AFCARS collection	K
64. (b.17.ii) Ever fathered or bore children	N/A not in the current AFCARS collection	K
65. (b.17.iii) Child and his/her child(ren) placed together at any point during the report period?	N/A not in the current AFCARS collection	K
66. (b.18) Special education	N/A not in the current AFCARS collection	E
67. (b.19) Prior adoption(s)	16. Has this Child Ever Been Adopted?	K
68. (b.19.i) Prior adoption date	N/A not in the current AFCARS collection	K
69. (b.19.ii) Prior adoption type - <i>intercountry</i>	N/A not in the current AFCARS collection	K
70. Prior Guardianship (b.20i)	N/A not in the current AFCARS collection	K
71. (b.20.ii) Prior guardianship date	N/A not in the current AFCARS collection	K
72. (b.21) Child financial and medical assistance	59 -65 Sources of Federal Financial Support/Assistance for Child	E
73. (b.21.i) SSI or Social Security benefits	64. SSI or Other Social Security Benefits	E
74. (b.21.ii) Title XIX Medicaid	63. Title XIX (Medicaid)	E
75. (b.21.iii) Title XXI SCHIP	65. None of the Above	E
76. (b.21.iv) State/Tribal adoption assistance	65. None of the Above	E
77. (b.21.v) State/Tribal foster care	65. None of the Above	E
78. (b.21.vi) Child support	62. Title IV-D (Child Support)	E
79. (b.21.vii) Title IV-E adoption subsidy	60. Title IV-E (Adoption Assistance)	E

80. (b.21.viii) Title IV-E guardianship assistance	65. None of the Above	E
81. (b.21.ix) Title IV-A TANF	61. Title IV-A	E
82. (b.21.x) Title IV-B	65. None of the Above	E
83. (b.21.xi) SSBG	65. None of the Above	E
84. (b.21.xii) Chafee Foster Care Independence Program.	65. None of the Above	E
85. (b.21.xiii) Other	65. None of the Above	E
86. (b.22) Title IV-E foster care during report period	59. Title IV-E (Foster Care)	K
87. (b.23) Total Number of siblings	N/A not in the current AFCARS collection	K
88. (b.24) Siblings in foster care	N/A not in the current AFCARS collection	K
89. (b.25) Siblings in living arrangement	N/A not in the current AFCARS collection	K
(c) Parent or legal guardian information	Principal Caretaker Information	
90. (c.1) Year of birth of first parent or legal guardian	45. Year of Birth (1 st Principal Caretaker)	E
91. (c.2) Year of birth of second parent or legal guardian	46. Year of Birth (2 nd Principal Caretaker - if applicable)	E
92. (c.3) Tribal membership mother	N/A not in the current AFCARS collection	K
93. (c.4) Tribal membership father	N/A not in the current AFCARS collection	K
94. (c.5) Termination/modification of parental rights.	N/A not in the current AFCARS collection	K
95. (c.5.i) Termination/modification of parental rights petition	N/A not in the current AFCARS collection	K
96. (c.5.ii) Termination/modification of parental rights	47. Date of Mother's Parental Rights Termination (if applicable) 48. Date of Legal or Putative Father's Parental Rights Termination (if applicable)	K

97 - 99 Involuntary termination/modification of parental rights under ICWA	N/A not in the current AFCARS collection	K
100. Voluntary termination/modification of parental rights under ICWA	N/A not in the current AFCARS collection	K
(d) Removal Information	Removal/Placement Setting Indicators	
101. (d.1) Date of child's removal	18 Date of first removal from home and 21. Date of latest removal	K
102. (d.2) Transaction date: removal	22. Removal Transaction Date	K
103 -105 Removals under ICWA.	N/A not in the current AFCARS collection	K
106. (d.4) Environment at removal	N/A not in the current AFCARS collection	R
107. (d.5) Authority for placement and care responsibility	25. Manner of Removal from Home for Current Removal Episode	R
(d)(6) Child and family circumstances at removal	Circumstances Associated with Removal	
108. (d.6.i) Runaway	N/A not in the current AFCARS collection	K
109. (d.6.ii) Whereabouts unknown	N/A not in the current AFCARS collection	K
110. (d.6.iii) Physical abuse	26. Physical Abuse (alleged/reported)	K
111. (d.6.iv) Sexual abuse	27. Sexual Abuse (alleged/reported)	K
112. (d.6.v) Psychological or emotional abuse	N/A not in the current AFCARS collection	K
113. (d.6.vi) Neglect	28. Neglect (alleged/reported)	K
114. (d.6.vii) Medical neglect	N/A not in the current AFCARS collection	K
115. (d.6.viii) Domestic violence	N/A not in the current AFCARS collection	K
116. (d.6.ix) Abandonment	38. Abandonment	K
117. (d.6.x) Failure to return	N/A not in the current AFCARS collection	K
118. (d.6.xi) Caretaker's alcohol use	29. Alcohol Abuse (parent)	K
119. (d.6.xii) Caretaker's drug use	30. Drug Abuse (parent)	K
120 (d.6.xiii) Child alcohol use	31. Alcohol Abuse (child)	K

121. (d.6.xiv) Child drug use	32. Drug Abuse (child)	K
122. (d.6.xv) Prenatal alcohol exposure	31. Alcohol Abuse (child)	K
123. (d.6.xvi) Prenatal drug exposure	32. Drug Abuse (child)	K
124. (d.6.xvii) Diagnosed Condition	33. Child's Disability	K
125. (d.6.xviii) Inadequate access to mental health services	N/A not in the current AFCARS collection	K
126. (d.6.xix) Inadequate access to medical services	N/A not in the current AFCARS collection	K
127. (d.6.xx) Child behavior problem	34. Child's Behavior Problem	K
128. (d.6.xxi) Death of caretaker	35. Death of Parent(s)	K
129. (d.6.xxii) Incarceration of caretaker	36. Incarceration of Parent(s)	K
130. (d.6.xxiii) Caretakers significant impairment – physical/emotional	37. Caretaker's Inability to Cope Due to Illness or Other Reason	K
131. (d.6.xxiv) Caretaker's significant impairment – cognitive	37. Caretaker's Inability to Cope Due to Illness or Other Reason	K
132. (d.6.xxv) Inadequate housing	40. Inadequate Housing	K
133. (d.6.xxvi) Voluntary relinquishment for adoption	39. Relinquishment	K
134. (d.6.xxvii) Child requested placement	N/A not in the current AFCARS collection	K
135. (d.6.xxviii) Sex trafficking	N/A not in the current AFCARS collection	K
136. (d.6.xxix) Parental immigration detention or deportation	N/A not in the current AFCARS collection	K
137. (d.6.xxx) Family conflict related to child's sexual orientation, gender identity, or gender expression.	N/A not in the current AFCARS collection	K
138. (d.6.xxxi) Educational Neglect	N/A not in the current AFCARS collection	K
139. (d.6.xxxii) Public agency title IV-E agreement	N/A not in the current AFCARS collection	K

140. (d.6.xxxiii) Tribal title IV-E agreement	N/A not in the current AFCARS collection	K
141 (d.6.xxxiv) Homelessness.	40. Inadequate Housing	K
142. (d.7) Victim of sex trafficking prior to entering foster care	N/A not in the current AFCARS collection	K
143. (d.7.i) Report to Law Enforcement	N/A not in the current AFCARS collection	K
144. (d.7.ii) Dates of each report	N/A not in the current AFCARS collection	K
145. (d.8) Victim of sex trafficking while in foster care	N/A not in the current AFCARS collection	K
146. (d.8.i) Report to law enforcement	N/A not in the current AFCARS collection	K
147. (d.8.ii) Date	N/A not in the current AFCARS collection	K
(e) Living arrangement and provider information.	Current Placement Settings	
148. (e.1) Date of living arrangement	23. Date of Placement in Current Foster Care Setting	K
149. (e. 2) Foster family home	41. Current Placement Setting	K
150. (e.3.i.) Foster family home type: Licensed home	N/A not in the current AFCARS collection	K
151. (e.3.ii) Foster family home type: Therapeutic foster family	N/A not in the current AFCARS collection	K
152. (e.3.iii) Foster family home type: Shelter care foster family home.	N/A not in the current AFCARS collection	K
153. (e.3.iv) Foster family home type: Relative foster family	41. Current Placement Setting - Foster Family Home (Relative)	K
154. (e.3.v) Foster family home type: Pre-adopt home	41. Current Placement Setting - Pre-Adoptive Home	K
155. (e.3.vi) Foster family home type: Kin foster family home	41. Current Placement Setting - Foster Family Home (NonRelative)	K
156. (e.4) Other living arrangement type	41. Current Placement Setting	K

157. (e.5) Private agency living arrangement.	N/A not in the current AFCARS collection	K
158. (e.6) Location of living arrangement	42. Is Current Placement Setting Outside of State or Tribal Service Area?	K
159. (e.7) Jurisdiction or country where child is living	N/A not in the current AFCARS collection	K
160 -164 (e.8) Available ICWA foster care and pre-adoptive placement preferences: a member of the Indian child's extended family	N/A not in the current AFCARS collection	K
165. (e.9) Foster care and pre-adoptive placement preferences under ICWA.	N/A not in the current AFCARS collection	K
166. (e.10) Good cause under ICWA.	N/A not in the current AFCARS collection	K
167 - 171. (e.11) Basis for good cause.	N/A not in the current AFCARS collection	K
172. (e.12) Marital status of the foster parent(s)	49. Foster Family Structure	R
173. (e.13) Child's relationships to the foster parent(s).	N/A not in the current AFCARS collection	R
174. (e.14) Year of birth for first foster parent	50. Year of Birth (1 st Foster Caretaker)	R
175. (e.15) First foster parent tribal membership.	N/A not in the current AFCARS collection	K
176 -182. (e.16) Race of first foster parent.	52. Race of 1 st Foster Caretaker	R
183. (e.17) Hispanic or Latino ethnicity of first foster parent.	53. Hispanic or Latino Ethnicity of 1 st Foster Caretaker	R
184. (e.18) Gender of first foster parent.	N/A not in the current AFCARS collection	R
185. (e.19) First foster parent sexual orientation.	N/A not in the current AFCARS collection	R

186. (e.20) Year of birth for second foster parent.	51. Year of Birth (2 nd Foster Caretaker)	R
187. (e.21) Second foster parent tribal membership.	N/A not in the current AFCARS collection	K
188 - 194. (e.22) Race of second foster parent.	N/A not in the current AFCARS collection	R
195. (e.23) Hispanic origin of the second foster parent	55. Hispanic or Latino Ethnicity of 2 nd Foster Caretaker (if applicable)	R
196. (e.24) Gender of second foster parent.	N/A not in the current AFCARS collection	R
197. (e.25) Second foster parent sexual orientation.	N/A not in the current AFCARS collection	R
(f) Permanency planning	Most Recent Case Plan Goal	
198. (f.1) Permanency plan	43. Case Plan Goal	K
199. (f.2) Date of permanency plan	N/A not in the current AFCARS collection	K
200 (f.3) Date of periodic review	5. Date of Most Recent Periodic Review (if applicable)	R
201 (f.4) Date of permanency hearing	5. Date of Most Recent Periodic Review (if applicable)	R
202 (f.5) Juvenile justice	N/A not in the current AFCARS collection	K
203 (f.6) Caseworker visit dates	N/A not in the current AFCARS collection	R
204 (f.7) Caseworker visit location	N/A not in the current AFCARS collection	R
205 Transition plan.	N/A not in the current AFCARS collection	R
206 Date of transition plan	N/A not in the current AFCARS collection	R
207 - 219 (f.10) Active Efforts.	N/A not in the current AFCARS collection	K
(g) General exit information	Discharge Data	
220. (g.1) Date of exit.	56. Date of Discharge from Foster Care (in foster care data file) and 21. Date adoption legalized (in adoption data file)	K
221. (g.2) Exit transaction date.	57. Foster Care Discharge Transaction Date	K
222. (g.3) Exit reason.	58. Reason for Discharge	K

223. (g.4) Transfer to another agency	N/A not in the current AFCARS collection	K
(h) Exit to adoption and guardianship information	Adoption Data File Data Elements – for adoptions only, guardianship not collected currently	
224. (h.1) Marital status of the adoptive parent(s) or guardian(s).	22. Adoptive Parents' Family Structure	K
(h.2) Child's relationship to the adoptive parent(s) or guardian(s).	29 – 32. Relationship to Adoptive Parent (Adoption only)	
225. (h.2.i) Child's relationship to the adoptive parent(s) or guardian(s). Paternal grandparent(s).	30. Relationship - other relative	K
226. (h.2.ii) Child's relationship to the adoptive parent(s) or guardian(s). Maternal grandparent(s).	30. Relationship - other relative	K
227. (h.2.iii) Child's relationship to the adoptive parent(s) or guardian(s). Other paternal relative(s)	30. Relationship - other relative	K
228 (h.2.iv) Child's relationship to the adoptive parent(s) or guardian(s). Other maternal relative(s)	30. Relationship - other relative	K
229 (h.2.v) Child's relationship to the adoptive parent(s) or guardian(s). Sibling(s).	30. Relationship - other relative (Adoption only)	K
230 (h.2.vi) Child's relationship to the adoptive parent(s) or guardian(s). Kin	30. Relationship - other relative or 32. Relationship - other nonrelative (Adoption only)	K
231. (h.2.vii) Child's relationship to the adoptive parent(s) or guardian(s). Non-relative(s)	32. Relationship - other non-relative (Adoption only)	K
232. (h.2.viii) Child's relationship to the adoptive parent(s) or guardian(s). Foster parent(s)	31. Relationship - foster parent (Adoption only)	K
233. (h.3) Date of birth of first adoptive parent or guardian.	23. Adoptive Mother's Year of Birth 24. Adoptive Father's Year of Birth	R

234. (h.4) First adoptive parent or guardian tribal membership.	N/A not in the current AFCARS collection	K
235 - 241 (h.5) Race of first adoptive parent or guardian.	25. Adoptive Mother's Race 27. Adoptive Father's Race	R
242. (h.6) Hispanic or Latino ethnicity of first adoptive parent or guardian.	26. Adoptive Mother's Hispanic Origin 28. Adoptive Father's Hispanic Origin	R
243. (h.7) Gender of first adoptive parent or guardian	N/A not in the current AFCARS collection	R
244. (h.8) First adoptive parent or legal guardian sexual orientation.	N/A not in the current AFCARS collection	R
245. (h.9) Date of birth of second adoptive parent, guardian, or other member of the couple.	23. Adoptive Mother's Year of Birth 24. Adoptive Father's Year of Birth	R
246. (h.10) Second adoptive parent, guardian, or other member of the couple tribal membership.	N/A not in the current AFCARS collection	K
247 – 253. (h.11) Race of second adoptive parent, guardian, or other member of the couple.	25. Adoptive Mother's Race 27. Adoptive Father's Race	R
254. (h.12) Hispanic or Latino ethnicity of second adoptive parent, guardian, or other member of the couple.	26. Adoptive Mother's Hispanic Origin 28. Adoptive Father's Hispanic Origin	R
255. (h.13) Sex of second adoptive parent, guardian, or other member of the couple.	N/A not in the current AFCARS collection	R
256. (h.14) Second adoptive parent, guardian, or other member of the couple sexual orientation.	N/A not in the current AFCARS collection	R
257. (h.15) Inter/Intrajurisdictional adoption or guardianship.	33. Child was placed from (Adoption only)	K
258. (h.16) Interjurisdictional adoption or guardianship jurisdiction	N/A not in the current AFCARS collection	K

259. (h.17) Adoption or guardianship placing agency.	34. Child was placed by (Adoption only)	K
260. (h.18) Assistance agreement type.	35 – 37. Financial Adoption Support (Adoption only)	K
261. (h.19) Siblings in adoptive or guardianship home.	N/A not in the current AFCARS collection	K
262 – 265. (h.20) Available ICWA Adoptive placements.	N/A not in the current AFCARS collection	K
266. (h.21) Adoption placement preferences under ICWA.	N/A not in the current AFCARS collection	K
267. (h.22) Good cause under ICWA.	N/A not in the current AFCARS collection	K
268 – 272. (h.23) Basis for good cause.	N/A not in the current AFCARS collection	K