June 13, 2018

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

Re: Comments to the Administration for Children and Families regarding the ANPRM (RIN 0970-AC72) to streamline the data reporting requirements under the Adoption and Foster Care Analysis Reporting System 2016 Final Rule.

Dear Ms. McHugh:

The Children's Defense Fund (CDF) is pleased to have the opportunity to respond and provide input on streamlining the data reporting requirements under the Adoption and Foster Care Analysis Reporting System (AFCARS) 2016 Final Rule published in the Federal Register on March 15, 2018 (Federal Register Vol. 83, No. 51, page 11449). CDF is very concerned about possible modifications to the AFCARS 2016 Final Rule (Final Rule) and strongly urges that you continue moving forward with implementation of the Final Rule without changes and without delay.

CDF has worked for more than four decades to improve outcomes for children who are at risk of placement in foster care or already in the care of public child welfare systems. CDF worked with others to establish the original federal mandate for a national data collection system that was included in federal law in the Omnibus Budget Reconciliation Act of 1986 and then kept the pressure on to get it finally operational in 1994. We believed then and continue to believe that the federal government has an important role in ensuring children are benefitting from federal child welfare laws. Over the years CDF, like many others, has responded to the numerous requests for public input on ways to update and improve AFCARS, including the 2008 Notice of Proposed Rulemaking (NPRM) for AFCARS, the 2010 Request for Public Comment on AFCARS, and the 2015 NPRM for AFCARS and 2015 SNPRM on the new data elements related to the Indian Child Welfare Act (ICWA). After advocating for nearly 25 years – spanning four Administrations – for updates to the original regulations published in 1993, we are very supportive of the AFCARS Final Rule released in 2016. Given numerous past notices, and the robust consultation and public comment that resulted from past requests for comment, we strongly recommend that implementation of the 2016 AFCARS Final Rule proceed as published without further delay and without further changes. The Final Rule reflects the improvements and changes in data requirements agreed upon and advocated for by the broad child welfare community to better reflect and inform us all about experiences of children involved in the child welfare system and ways to strengthen child outcomes and the system.

The Benefits of the AFCARS 2016 Final Rule Outweigh Any Burden from the New Data

The updates made to AFCARS in the Final Rule were long overdue. The rule from 1993 is outdated and does not reflect current child welfare practices or protections added to federal child welfare law over the past 25 years or new reporting required of states. The Administration for Children and Families (ACF) needs to know how children are faring. Prior to the Final Rule, the reporting system

fell short in helping to clarify the needs of children who come to the attention of the child welfare system, the services and supports they and their families receive, the timeliness of those services, the stability of their placements when in foster care, permanence provided, and children's final outcomes. The Final Rule made a number of significant changes and improvements that will provide a more comprehensive picture of a child's time in care as required in Section 479 of Title IV-E of the Social Security Act. It is because of this that we strongly believe any consideration of burden with the Final Rule needs to be balanced with a corresponding examination and acknowledgement of the benefits of the Final Rule.

States and the public had ample opportunities to raise concerns about burden over the past four public comment periods – spanning 15 years – related to updating AFCARS. Information on the burdens related to updating the AFCARS regulations were specifically requested in the past comment periods and concerns should have been made and addressed during that time. In fact, the Final Rule represents a "streamlining" of the original proposed 2015 NPRM and 2016 SNPRM and the burdens identified by commenters were addressed and explained in the Final Rule. There will always be a rationale for delaying and reexamining revisions because of the ongoing progress to amend and improve child welfare policy and practice, and there will always be a cost and burden for any future revisions. However, cost and burden alone should not be the rationale for further delays to accommodate additional changes when they would deprive the community of the benefits of more comprehensive data on child and family outcomes and resulting policy and practice improvements needed to push the field forward for children.

Part of the rationale for this ANPRM is an overall directive by President Trump to reduce regulatory burdens on the American people. We feel this action must consider all people – and therefore go beyond just the potential burden on the child welfare agency – and include those families and children touched by the child welfare system. We believe delaying an update of the 25-year-old AFCARS standards will create a greater burden for these families because it will undercut evaluation and improvement of how these families and their children are supported.

Changes to the Final Rule Increase Uncertainty and Burden and Deny Children Long Overdue Reporting on Essential Benefits

The AFCARS 2016 Final Rule brought much needed clarity to data collection and reporting on behalf of children in the child welfare system, after many years of comments and input. To now continue this pattern of delay and request public input on AFCARS means further uncertainty for states – and burden related to this uncertainty – and the continued lack of beneficial information on children. States that already have started updating their data systems and working to meet the 2019 implementation deadline, now likely feel unease as to whether investments they already made may have to be diverted in new ways. Seeking additional information on burden, which has previously been reported on, nearly half way into a three-year implementation process, creates additional unnecessary confusion for state agencies and perhaps cost burdens for some.

In assessing burden, it is also essential to take into account the enormous advances that have been seen in technology over these many years that have made the task of data collection much easier. The recent improvements and updates to state data systems through the new Comprehensive Child Welfare Information System (CCWIS) removes some of the challenging requirements around a single comprehensive state system and allows for the use of cost-effective and innovative technologies to automate and stay up to date on the collection of high quality case management data. Rather than

focusing now on burden, ACF instead over this next year should assist states to use their CCWIS to meet the requirements in the Final Rule without any further changes or delays.

Responses to the Questions for Comment Provided in the ANPRM:

- **Question 1: Identify the data elements, non-ICWA-related, that are overly burdensome for state and tribal title IV-E agencies and explain why. Please be specific in identifying the data elements and provide a rationale for why collecting and reporting this information is overly burdensome.**

  CDF strongly supports all of the new data elements included in the Final Rule and believes these data are critically important to understanding the unique needs and challenges facing children and families involved in care and helping identify the policy solutions that can address these challenges. While we support all of the new data elements included in the Final Rule, and ask that ACF not streamline or eliminate any of the new data elements, we wanted to express our strong support for several of the data elements below. In each area, we believe the benefits that will result for children far outweigh the burdens other may identify.

  New Data on Sexual Orientation, Gender Identity, and Gender Expression

  ACF should maintain the data elements in the Final Rule related to sexual orientation, gender identity, and gender expression so that states and tribes can improve outcomes, identify and fund needed resources, and reduce disparities experienced by lesbian, gay, bisexual, transgender, and questioning ("LGBTQ") youth in care. Data on these youth at the state level are urgently needed to improve outcomes, reduce costs, and reduce disparities; data at the national level are necessary to inform federal law, policy and funding determinations, to identify best practices for replication and to enhance ACF's efforts to prevent removal and allow children to remain safely at home with their families. Identifying LGBTQ foster youth through the voluntary sexual orientation question and implementing effective interventions to reduce instability, minimize costly stays in group homes, hospitals and juvenile justice facilities and improve permanency in family home settings would provide tremendous cost savings. We believe such benefits resulting from information related to these new data elements outweigh any burden and cost associated with implementation.

  The sexual orientation and gender identity (SOGI) and expression data elements of foster youth can be administered safely, and ACF should provide training and resources to states and tribes to do so. Many public agencies already collect this information on youth, and increasingly more state and local child welfare and juvenile justice agencies, as well as providers serving youth experiencing homelessness, have developed policies requiring the collection of SOGI data as part of the initial intake and assessment. In the Final Rule, the Children's Bureau summarized its well supported rationale for collecting information regarding the sexual orientation of youth 14 years old and older, saying that "information on sexual orientation should be obtained and maintained in a manner that reflects respectful treatment, sensitivity, and confidentiality." Additionally, the Final Rule directed agencies to guidance and recommended practices developed by "state and county agencies, advocacy organizations and human rights organizations."

We also believe it is important to retain the data element related to the reason for removal due to "family conflict related to child's sexual orientation, gender identity, or gender expression" as this information can help identify targeted family preservation services and help keep that child safely with their family, a priority of the current ACF administration. ACF should also retain the voluntary sexual orientation question for adoptive and foster parents and guardians, as the LGBTQ community is a significant untapped resource in the effort to find permanent families for all children and youth in foster care. Gay and lesbian foster parents are raising six percent of foster children in the United States, and same-sex couples are six times more likely to be serving as foster parents than their different-sex counterparts.[1] National surveys find that nearly 2 million lesbian, gay and bisexual adults are interested in adopting children.[2]

New Data on the Educational Needs and Achievement of Children in Foster Care

The new educational data are essential to understanding and measuring the educational progress and needs of children in foster care, and necessary to inform and improve states' practice and policies that can better support their unique educational challenges. The education data elements have already been open for extensive public comment and debate, and the education data in the Final Rule is the end result of identifying a finite number of basic education data elements that will yield critically important national level data. These data elements are easy to collect and report on, and more importantly, are information that child welfare agencies already can and should have. Although educational information was not part of AFCARS prior to the Final Rule, several of these data elements are already being collected by states pursuant to the requirements of *Fostering Connections to Success and Increasing Adoptions Act of 2008* (Fostering Connections) and should not create an unnecessary burden for child welfare professionals. Where these data elements are not already being collected, data sharing between child welfare and education entities can minimize the burden of collecting these data. The educational data elements included in the Final Rule – school enrollment, educational level, educational stability and special education – are unambiguous and straight-forward – qualitative review or case study is not required for accurate reporting. These are data states already should have.

The two elements of school enrollment and school stability are also directly related to federal requirements under Fostering Connections. Child welfare agencies are already required to ensure all children in foster care receiving Title IV-E funding are enrolled in school; documentation of this does not create a burden and in fact most already do so. Similarly, documenting whether children have moved school placements and for what reasons is also required under Fostering Connections as part of the child's case plan. As such, reporting should not create an unnecessary burden, and will allow for better analysis about the challenges of students in foster care related to education stability.

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[1] [1] Gary Gates, LGBT Parenting in the United States, The Williams Institute, UCLA School of Law, February 2013, http://williamsinstitute.law.ucla.edu/research/census-lgbt-demographics-studies/lgbt-parenting-in-the-united-states/

[2] [2] The Williams Institute & The Urban Institute, Foster and Adoptive Parenting by Gay and Lesbian Parents in the United States, (2007).

New Data on the Title IV-E Guardianship Assistance Program

CDF was very pleased with the new data elements in the Final Rule that capture information on children who exit care receiving Title IV-E guardianship assistance. CDF – along with our partners at Casey Family Programs, the American Bar Association Center on Children and the Law, and Generations United – has provided technical assistance over the years to states to help them implement their Title IV-E Guardianship Assistance Programs (GAP), and have struggled for years to collect reliable and consistent data across the states on GAP. These new data are critically needed to help with the assessment of the new program, which was created under the *Fostering Connections to Success and Increasing Adoptions Act of 2008*, including how children are benefitting from GAP, the fiscal impact of GAP on the states, and ways to strengthen the program to reach more children and guardians. Given the important structural changes made to AFCARS in the Final Rule, specifically the shift to a national longitudinal data system that will help collect and report data in a way that provides a more comprehensive picture of a child's experience in care, we believe there will be significant benefits with this data since it will allow ACF better understand who and how GAP is being used. The new GAP data elements are easy to collect and report on and are information that child welfare agencies already can and should have.

- **Question 2: Previously, we received comments regarding burden and the system changes needed to report the ICWA-related data elements of the 2016 SNPRM. We would like to receive more detailed comments on the specific limitations we should be aware of that states will encounter in reporting the ICWA-related data elements in the final rule. Please be specific in identifying the data elements and provide a rationale for why this information is overly burdensome.**

  CDF is very supportive of the new data elements included in the Final Rule that ensure American Indian and Alaska Native (AI/AN) children are afforded the protections assured to them in the Indian Child Welfare Act (ICWA). Although progress has been made as a result of ICWA, AI/AN children still are at great risk of being removed from their families and tribes and placed in non-Indian homes where they are at risk of being denied their identity and culture. For too long these children have not had the full benefit of federal protections in ICWA that were designed to reduce their numbers in care and help maintain their identity and culture.

  The Impact of ICWA is Currently Not Being Tracked

  The Final Rule requests Title IV-E state agencies to provide the number of children in foster care who are considered Indian children as defined in ICWA. This data element is currently not collected or reported in any national child welfare data system and is the key to understanding other important issues that are unique to AI/AN children and federal law requirements under ICWA. The current data in AFCARS only identify AI/AN children through self-identification, which provides inaccurate and unreliable data. Relevant data measures in ICWA related to placement, engagement with the child's tribe, and efforts to avoid placement are not collected, leaving federal agencies, states, Congress, and tribes with little information to address issues impacting this population.

  Indian tribes and tribal organizations were very supportive of the Final Rule following decades of requests to modify AFCARS to address the lack of actionable data on AI/AN children for whom

state agencies receive federal funds under Title IV-E. Some states have involved and collaborated with tribes and other relevant stakeholders as they implement policies and practices needed to provide protections for AI/AN children in ICWA. This has included data sharing of child welfare information with the tribes recognizing that correct data can demonstrate what is working and further steps needed to ensure the safety, permanency and well-being of Indian children. However this data sharing has not happened at a national level and there are concerns around variability in the current state data collection. ACF should have a strong interest in improving the availability of national data that are accurate and reliable for this population.

HHS has the Responsibility to Ensure Eligible Children are Benefitting from ICWA

Implementation of the protections in ICWA is an important responsibility for HHS and child welfare agencies to ensure child welfare practice as it relates to AI/AN children is consistent with federal law. Compliance with ICWA by states is erratic and state court decisions inconsistent. Requiring child welfare agencies to report data on practice as it relates to AI/AN children will help states and tribes to develop improved policies, technical assistance, training and resources, with the help of ACF, to better meet appropriately and comprehensively the needs of Indian children. This specific look at AI/AN children will help benefit their particular needs and complement benefits they share with other children so they can be addressed in policy and practice. The benefits of this information outweigh the burden related to data collection.

Furthermore, Section 422(b)(9) of the Social Security Act requires that Title IV-B state plans "contain a description, developed after consultation with tribal organizations…in the State, of the specific measures taken by the State to comply with the Indian Child Welfare Act." HHS has implemented the Title IV-B ICWA state plan requirement through a Program Instruction [ACYF-C B-PI-14-03 (2014)]. The Program Instruction detailed specific measures to be taken by the State to comply with ICWA. They included:

- Notification of Indian parents and Tribes of state proceedings involving Indian children and their right to intervene;
- Placement preferences of Indian children in foster care, pre-adoptive and adoptive homes;
- Active efforts to prevent the breakup of the Indian family when parties seek to place a child in foster care or for adoption; and
- Tribal rights to intervene in state proceedings, or transfer proceedings to the jurisdiction of the Tribe.

Certainly the inclusion of a requirement for such measures in the Title IV-B State Plan and the Program Instruction establish broad authority for including specific data elements related to ICWA in AFCARS. In fact, the Program Instruction instructs states to "identify sources of data to assess the state's ongoing compliance with ICWA" as part of meeting its Title IV-B requirement. Collecting such data in the AFCARS will presumably facilitate and make easier state compliance with the section 422(b)(9) requirement, as it has been explained in the Program Instruction.

It is also important that HHS recognize its responsibility for the well-being and outcomes of all children and how states are ensuring that children, taking into account their special needs of various groups, get the benefits they deserve. The Child and Family Services Reviews (CFSR), for example, examine states' performance for *all* children and families and some states' Performance Improvement Plans include action items related to ICWA. The new ICWA data in

the 2016 AFCARS Final Rule will help clarify how states are doing in improving outcomes and performance with regard to all children and families served, including American Indian and Alaska Native children.

There is Minimal Burden, and the Benefits Outweigh any Potential Burdens

The Final Rule only requires states to collect the ICWA data elements for AI/AN children that are ICWA eligible. Regardless of whether AFCARS data are collected, all states are required by law to examine whether a child is ICWA eligible, so this effort is already required outside of AFCARS requirements. The Final Rule data specific to AI/AN children are not required to be collected for non-Indian children so while there will be additional data collection for AI/AN children who are ICWA eligible, given the small number of AI/AN children in the vast majority of states this will not require a significant burden.

The activities related to the data are required by federal law, such as ICWA, and should be documented in any child welfare case file. The vast majority of the data would come from state agency activities with a few data elements coming in the form of state court orders, which should also be included in any well documented case file. In addition, not having this information in a case file poses risk that court orders are not being properly implemented, placing children in jeopardy of not receiving the benefits of court oversight in child welfare.

ACF Provided Ample Notice and Opportunities to Comment on the Final Rule.

On February 9, 2015, ACF published an NPRM (80 FR 7132) to amend AFCARS, which included an acknowledgement that ACF received comments asking for additional data elements that would address ICWA requirements and provide a comprehensive picture of the well-being of tribal children. ACF stated it did not include information on ICWA in the 2015 NPRM because they interpreted the enabling statute of AFCARS as limiting data collection to information related to Title IV-B and IV-E program requirements.

On April 2, 2015, ACF announced in the Federal Register an Intent to Publish a SNPRM (80 FR 17713) and that ACF had determined that there is authority to collect ICWA. A year later, April 7, 2016, ACF published another SNPRM (81 FR 20283) proposing the addition of new AFCARS data elements related to federal requirements specific to ICWA and placements of AI/AN children.

The Final Rule was the product of a thorough and well-reasoned process that included opportunities for states, tribes, and other interested parties to comment. Issues related to the benefits for AI/AN children and families and burdens upon states to collect and report the data were thoroughly addressed in the Final Rule. While there was almost unanimous support provided for including the new data elements for AI/ANs, there was also very little concern expressed by states submitting comments specific to the addition of new data elements for AI/AN children and families. The few state comments that were received that expressed concern with the ICWA data elements were generally vague and expressed general concern regarding the burden of collecting new data of any type. Furthermore, as evidenced in the Final Rule discussion, ACF engaged in several discussions with states regarding their perspectives on the proposed data changes and as a result streamlined many of the data elements proposed in the SNPRM. The very thorough and well-thought out regulatory process used in developing the Final Rule is evidence that no additional collection of information is necessary.

- **<u>Question 3:</u> Please provide specific recommendations on which data elements in the regulation to retain that are important to understanding and assessing the foster care population at the national level. Also, provide a rationale for your suggestion that may include its relevance to monitor compliance with the Title IV-B and IV-E programs or another strong justification for using the data at the national level.**

  All of the new data included in the Final Rule need to be retained in order to understand and assess at the national level the experiences and challenges children face while in foster care across the country. The new data elements reflect both critical missing information that helps us better understand the circumstances that brought these families to the attention of the system, but also help us track how policy changes made since 1993 have improved outcomes of children and states' compliance with those federal requirements. For example, the *Fostering Connections to Success and Increasing Adoptions Act of 2008* made many significant changes to Title IV-E and IV-B, however the old AFCARS data system did not reflect those changes so advocates have struggled to fully understand and assess the impact of these provisions at the national level. Specifically, the new data elements in the Final Rule help us understand how states policies and practices conform to the requirements in Fostering Connections:
  - The new educational data elements align with the educational requirements (see our response to Question 1 above for further detail).
  - The new health-related data elements are critical to monitoring compliance with the Health Oversight and Coordination Plans (HOCP) that are a part of states' five-year Child and Family Service Plans (CFSPs). CDF, and our health advocacy partners like the American Academy of Pediatrics, have been concerned about states' fidelity to the HOCP provisions and believe that individual case reviews have proven insufficient for tracking. National level data related to child health and wellbeing are critical to ensuring the effective provision, coordination, and oversight of health services for children in foster care. These data are also critical for identifying and addressing potential barriers to children accessing needed care.
  - The new data on siblings help us understand if a child has siblings and if they are placed together in care. This sustained connection to a child's birth family can help to alleviate the traumatic experience accompanying removal and placement into out-of-home care, and these data are important to understand how siblings in care are connected.
  - The new data on the Title IV-E Guardianship Assistance Program signal progress in placements with kin (see our response to Question 1 above for further detail).

  The Final Rule also reflects new data requirements from the *Preventing Sex Trafficking and Strengthening Families Act of 2014*, specifically the new data on victims of child sex trafficking and data on adoption and guardianship disruption and dissolution. The Preventing Sex Trafficking Act actually required that AFCARS be amended to include data on child sex trafficking and required HHS to release guidance on how states are to collect data on adoption and guardianship disruption and dissolution.

  All of the Indian Child Welfare Act data elements in the Final Rule are appropriate for a national data system like AFCARS. The related activities are required by federal law under ICWA and should be documented in any child welfare case file. The vast majority of the data would come from state agency activities with a few data elements coming in the form of state court orders, which should also be included in any well documented case file. Capturing AI/AN data through case file reviews or other qualitative methods would not provide the data that

Congress, states, and tribes need on an ongoing basis to make necessary changes in policy, practice, and resource allocation to address the serious problems that have been impacting AI/AN children for over two decades. Existing qualitative methods, like case file reviews under the Child and Family Services Reviews, have demonstrated the limitations of these data for informing Congress on how best to address critical concerns for AI/AN children.

- **<u>Question 4:</u> Please provide specific suggestions to simplify data elements to facilitate the consistent collection and reporting of AFCARS data. Also, provide a rationale for each suggestion and how the simplification would still yield pertinent data.**

  CDF believes the Final Rule reflects an effective balance between the need for administrative simplicity and the need for reliable, consistent data that can support the work of ensuring the safety, permanency, and well-being of children in care. There were many data elements that CDF and others suggested for inclusion during earlier rounds of public comment leading up for the Final Rule, and ACF provided thoughtful responses and explanations as to why certain data elements were included or excluded in the Final Rule, including a look at burden and reliability. The decades-long ongoing delay of an update to AFCARS has itself contributed to inefficiencies in child welfare data systems and a lack of information states need to manage their programs and ACF needs to monitor their compliance with federal child welfare law. The continued delay of the implementation of the Final Rule creates significant administrative burden within ACF by limiting the agency's ability to ensure the effective implementation of federal laws designed to, among other things, ensure vulnerable children in foster care have access to needed health services.

  Concerns with variability will particularly worsen if the data on ICWA are eliminated or streamlined. The new national data on ICWA creates for the first time uniformity across the states to better understanding the implementation and impact of ICWA and how AI/AN children are faring in the system. Prior to the Final Rule only a few states were collecting any data specific to AI/AN children, and the AFCARS data questions used self-identification as a determinant of whether a child is AI/AN, rather than the appropriate questions related to their citizenship in a tribal government, all of which lead to vast variability in data collection.

- **<u>Question 5:</u> Provide specific recommendations on which data elements in the regulation to remove because they would not yield reliable national information about children involved with the child welfare system or are not needed for monitoring the Title IV-B and IV-E programs. Please be specific in identifying the data elements and provide a rationale for why this information would not be reliable or is not necessary.**

  CDF does not recommend the removal of any data elements included in the Final Rule. We strongly believe all the data reflected in the Final Rule are critically needed for ACF to monitor the Title IV-B and IV-E programs. The new data in the Final Rule help ACF monitor the progress and impact on children of policies, practices and protections included in federal child welfare legislation enacted since 1993, including the *Fostering Connections to Success and Increasing Adoptions Act of 2008* and the *Preventing Sex Trafficking and Strengthening Families Act of 2014*, many of which had specific data or reporting requirements. Many of the new data elements will also assist states in implementing the recently passed *Family First Prevention Services Act.* The new ICWA data are all tied to existing federal law and regulation and necessary for the monitoring of Title IV-E and IV-B programs and ensuring utility and

reliability in the data at the national level. The Title IV-B plan requirement that states consult with tribal governments on their plans to implement ICWA has so far relied primarily on anecdotal information that is not collected or tracked uniformly by ACF leading to uneven responses to concerns about poor outcomes for AI/AN children in different states. The ICWA data elements in the Final Rule will provide a complete picture of how AI/AN children are doing, however eliminating or streamlining some of these data elements could result in compromising the integrity of the data and ACF's ability to confidently inform policymakers and other stakeholders about the important data trends and explanations for these trends related to AI/AN children and ICWA.

Conclusion

The Children's Defense Fund strongly urges ACF to maintain the existing AFCARS 2016 Final Rule without any additional changes. We also strongly oppose any potential delay in the Final Rule and urge ACF to continue moving forward with the October 1, 2019 compliance and effective date. Cost and burden alone should not be a rationale for further delays, as we need the updated data in the Final Rule to have better information on both federal and state changes in policy and practice. We appreciate the opportunity to respond to your request for input and urge you to abandon changes to the Final Rule given that the benefits – after multiple opportunities to comment on the rule – far outweigh burdens already reported on during consideration of the 2016 AFCARS Final Rule.

We recommend you follow through on implementation of these important new data requirements and provide necessary technical assistance to state child welfare agencies to help them enhance state data collection and implementation of AFCARS. In its totality, the AFCARS 2016 Final Rule represents significant progress in helping to ensure benefits for children intended in legislation enacted over the past two and a half decades and to better understand the experiences of children in the child welfare system nationally, the variation state to state and the impact of those experiences on child outcomes. The data improvements anticipated by the Final Rule will help inform policy and practice with the goal of making life better for children and their families.

We would be happy to discuss any of our comments in more detail with you or others on your staff.

Sincerely yours,

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