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June 12, 2018

Ms. Kathleen McHugh
Division of Policy, Children's Bureau
Administration for Children and Families
330 C St. SW
Washington, D.C. 20024

Dear Ms. McHugh:

**RE: ADVANCE NOTICE OF PROPOSED RULEMAKING:
ADOPTION AND FOSTER CARE ANALYSIS AND
REPORTING SYSTEM (AFCARS) – RIN 0970-AC72**

The County Welfare Directors Association of California (CWDA), representing the human services directors in California's 58 counties, welcomes the opportunity to comment on Advance Notice of Proposed Rulemaking for the proposed efficiencies to the Adoption and Foster Care Analysis and Reporting System (AFCARS). California has the largest state-supervised, county-administered child welfare system in the nation. AFCARS data elements provide services to nearly 87,300 children, of whom 60,000 are in the foster care system.

CWDA supports the December 2016 final rule's data collection provisions. It is absolutely vital that the federal Administration for Children and Families continues to collect the multitude of data elements of the most vulnerable children as described in the rule, including those children in the child welfare system who are subject to the Indian Child Welfare Act (ICWA) and lesbian, gay, bisexual, transgender, and questioning (LGBTQ) youth. CWDA strongly believes that the available data enhances best child welfare practice and the ability of our county child welfare agencies to offer evidence-based services to enhance the safety, permanency, and well-being of all youth in our care. CWDA also wishes to align itself with the comments submitted on June 5, 2018 by California's Department of Social Services (CDSS) and will collaborate with CDSS to ensure that the data elements required by the final rule are collected and reported. In sum, we support the rule without equivocation.

Thank you for the opportunity to provide comment Tom Joseph, Director of CWDA's Washington Office at 202.898.1446 or ti@paragonlobbying.com should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "F. Mecca", with a long horizontal flourish extending to the right.

Frank J. Mecca | Executive Director