



**State of Florida
Department of Children and Families**

Rick Scott
Governor

Mike Carroll
Secretary

May 4, 2018

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

Re: RIN: 0970-AC72

Dear Ms. McHugh:

Thank you for the opportunity to provide additional comments related to the cost and burden estimates for implementation of the AFCARS rule. Florida believes our original comments (ACF-2015-0001-0108 and ACF-2015-0001-0129) remain pertinent. The information below should be considered in concert with, and in addition to those original comments.

In preparation for implementing the AFCARS rule Florida contracted with a third-party vendor for a detailed feasibility study to identify the full scope of technology, training, policy, and practice requirements needed to align Florida's child welfare practice with the new AFCARS rule, and the financial impact of implementing the rule. Details from this study are incorporated below.

Data Collection:

The new AFCARS requirements will require additional time on the part of Child Welfare Professionals to collect and report information properly. Most of the additional time will be for Out-of-Home Care cases, when children are in foster care.

Some children, such as those eligible under the Indian Child Welfare Act (ICWA), require increased collection time. In addition, the estimate includes the new data points that need to be collected as the child enters out-of-home care, while others need repeat collection to ensure that the data still is valid. Some of these repeat collection requirements can be passively collected (i.e. the case worker does not need to routinely inquire about the data collection and can expect to be alerted if the situation changed) while others must be actively collected, with a case worker inquiring at regular intervals about certain data elements. Additionally, ad-hoc collecting may be required to external events, such as court dates or legal challenges. These events cannot be readily planned for. These factors were considered when estimating the time required to collect the new data elements.

Understanding there will be variability, Florida applied the ACF estimate of 3 hours per case¹, at \$23.88 per hour² to the Florida caseloads to determine the estimated cost burden of data

¹ "Adoption and Foster Care Analysis and Reporting System", Fed. Reg. Vol 81, No 240, pp 90568 (December 14, 2016)

² "Adoption and Foster Care Analysis and Reporting System", Fed. Reg. Vol 81, No 240, pp 90567-90568 (December 14, 2016)

collection. The results are an additional cost of **\$6,548,539** over the first four years of the implementation of the rule. This excludes any additional data collection costs associated with the ICWA requirements. The breakdown for FFY's 2020 -2023 is as follows:

Federal Fiscal Year	Average Number of Cases already in Out of Home Care that need to be updated for the new AFCARS data elements	Average Number of Cases entering Out of Home Care that need to be collected for the new AFCARS data elements	Number of Hours [Cases x 3 hrs.]	Estimated Costs [hrs. x 23.88]
FFY 2020	23,597	16,953	121,650 Hours	(\$2,905,000)
FFY 2021	0	16,953	50,859 Hours	(\$1,214,513)
FFY 2022	0	16,953	50,859 Hours	(\$1,214,513)
FFY 2023	0	16,953	50,859 Hours	(\$1,214,513)

Training:

Aligning with this rule will require Florida to provide additional training to newly hired Case Managers, Adoption Specialists and Licensing Specialists and Child Protective Investigators; and will require Florida to train current case workers and Child Protective Investigators on how to use the newly modified system and appropriately collect the new AFCARS data.

Florida estimates that there are 8,500 current individuals who will need an estimated 12 hours of in-service training on the updated system; and it is estimated there will be an average of 2,125 new hires who will need 4 hours of pre-service training each year after the initial year.

There are also administrative tasks associated with training personnel on the AFCARS requirements (e.g. reviewing instructions, developing the training and manuals), and training personnel on AFCARS requirements. The results are an additional cost burden of **\$3,044,700** over the first four years of the implementation of the rule. The breakdown for FFY's 2020 -2023 is as follows:

Federal Fiscal Year	In-Service Training Hours per Staff Member	Pre-Service Training Hours per Staff Member	Number of Staff	Number of Hours [Hours x Staff]	Estimated Costs [hrs. x 23.88³]
FFY 2020	12	0	8,500	102,000 Hours	(\$2,435,760)
FFY 2021	0	4	2,125	8,500 Hours	(\$202,980)
FFY 2022	0	4	2,125	8,500 Hours	(\$202,980)
FFY 2023	0	4	2,125	8,500 Hours	(\$202,980)

³ "Adoption and Foster Care Analysis and Reporting System", Fed. Reg. Vol 81, No 240, pp 90567-90568 (December 14, 2016)

Technology

Florida Safe Families Network (FSFN) is Florida's Child Welfare Information System. Extending FSFN to incorporate the additional elements for AFCARS will require changes to the following FSFN components:

Application Web Servers

This component contains the screens and navigation logic associated with the FSFN application. New AFCARS data elements will need to be incorporated into the screens, associated data validation and field navigation logic. In cases where new screens are required, the screen navigation logic will need to be updated to incorporate the screen into the application flow.

Reporting Servers

This will involve incorporating new AFCARS data elements into new, or existing, FSFN reports, and publishing these modifications to the appropriate File Servers. SAP Business Objects is currently being used for FSFN reporting.

Data Extract, Transform, and Load (ETL)

ETL is used primarily to move data within different FSFN databases and some external organizations. ETL is used to take data from FSFN's transactional databases and move them to reporting databases. This is done to isolate the production system from potential reporting performance issues. The reporting and transactional databases are designed considerably different based on their reporting and transactional purposes. ETL is used to handle the transformation of the transactional data structure into the data structure used to support reporting. The addition of AFCARS data elements will require changes to both the transactional and reporting data structures. The ETL will need to be modified to incorporate these changes.

Batch Processing

Batch processing typically involve activities that can be performed outside of peak hours. These might involve pushing copies of databases and reports out to the CBC's. The AFCARS updates should have minimal impact on FSFN Batch Processing but will require updates.

Databases

There are five FSFN databases. The new AFCARS elements will need to be added to each of those databases. This will require some database design effort to determine if the new columns are added to existing tables, or if new tables may be required. These new data elements would also need to be documented in the data dictionary.

The following is a list of the updates that would need to be made to FSFN to accommodate the new AFCARS requirements. The results are an estimated cost of **\$8,946,630** over two years leading up to the implementation of the rule.

#	Title	LOE (hours)	Assumptions
1	Person Management (Existing Page)	4,200	This assumes modifications to the Basic tab, Additional tab and AFCARS/ Other Participant Information (this includes repeating groups to store historical information).
2	ICWA Child/ Adult (New Page)	4,320	New ICWA Page to capture all the ICWA Information for both children and adults.
3	Adoption Information (Existing Page)	578	Adoption Information is only impacted related to capturing Adoption Dissolutions and currently only pre-fills if the child was previously adopted from Person Management.
4	Title IV-E Adoption Eligibility (Existing Page)	2,620	Title IV-E Adoption Eligibility is only impacted related to capturing Adoption Dissolutions. There isn't detail as to what could change if impacted.
5	Case Plan Worksheet (Existing Page)	578	Case Plan Worksheet is only impacted related to the school proximity.
6	Young Adult Case Plan Worksheet (Existing Page)	578	Young Adult Case Plan Worksheet is only impacted related to the Transition Plan information for Element 1355.44(f)(8).
7	Education (Existing Page)	1,579	Adding AFCARS related Education elements to the existing system.
8	Title IV-E Foster Care Eligibility (Existing Page)	4,120	Title IV-E Foster Care Eligibility is impacted if Teen Parent check box changes are made, which are used for deeming calculations. In addition, if modifications are made to Removal Home Information on OHP, this may or may not impact Title IV-E FC Eligibility.
9	Legal Page (Existing Page)	578	This is only for reference value changes.
10	Medical Mental Health (Existing Page)	1,579	Adding AFCARS related MMH elements to the existing FSFN pages.
11	Out of Home Placement (Existing Page)	4, 120	Adding elements to capture Out of Home Placement information.
12	Person Provider (including Licensing) (Existing Pages)	4,120	This is assuming that Marital Status will be modified on the Person Provider page, as well as a modification to Licensing.
13	Organization Provider (Existing Page)	578	This is only for reference value changes.
14	SCHIP (New Page)	4,320	Adding elements to capture information on State Children's Health Insurance Program for AFCARS.
15	General TANF (Existing Page)	2,620	General TANF and Adoption TANF are being modified related to the Pre-Relative Caregiver Cash Assistance Program
16	Adoption TANF (Existing Page)	2,620	General TANF and Adoption TANF are being modified related to the Pre-Relative Caregiver Cash Assistance Program
17	Maintain Case (Existing Page)	578	This is only for reference value changes.
18	Child Investigation (Existing Page)	2,620	Child Investigation is being modified to capture if Law Enforcement was notified related to Human Trafficking, including a date field. This LOE includes restructuring the

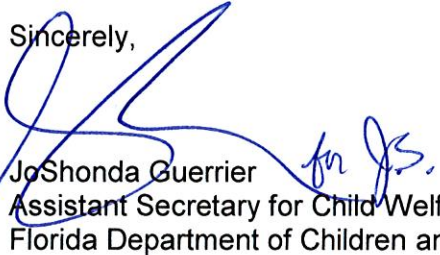
#	Title	LOE (hours)	Assumptions
			group box on the Allegations/ Findings tab because there is no real estate currently.
19	AFCARS Online Exceptions (Existing Page)	4,320	Adding information for AFCARS Online Exception.
20	ETLs (including Data Warehouse and Data Mart, AFCARS file submission)	4,120	Data Dictionary and file submission is accounted for within this LOE for Functional.
21	BOE (Universes and Exception Report)	4,120	Universe Document and Exception Report is accounted for within this LOE for Functional.
22	CAMS Interface	1,579	Adding AFCARS elements to interface.
23	NYTD Interface	4,079	Adding AFCARS elements to interface.
24	NCANDS Interface	2,579	Adding AFCARS elements to interface.
25	Templates	4, 320	This is inclusive of all templates impacted by any of the modules listed above, as well as Court Involved Case Plan and Judicial Review.

Conclusion:

In total, the estimated cost for implementing the new federal AFCARS rule in Florida is over **\$18,500,000** in state and federal funding over the first four years of implementation. While Florida sees great value in collecting pertinent information on children and families in the child welfare system, we believe the system- including our most vulnerable children and families, may not only not benefit from these requirements, but may be harmed as critical resources are diverted to pay for the necessary changes. This, coupled with concerns about the impact some of these requirements may have on the caseworker's relationship with the children and families they are working to protect, makes Florida a strong advocate for revisiting and rewriting this rule.

Florida appreciates the opportunity to respond to this ANPRM, and is willing to participate on any workgroups or in future meetings related to the development of a revised AFCARS rule.

Sincerely,


JoShonda Guerrier
Assistant Secretary for Child Welfare
Florida Department of Children and Families