

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. If possible, provide specific cost and burden estimates related to the following areas:

There are approximately 10,000 children who are in Iowa's foster care system annually. The following non-ICWA related elements are not included in our child welfare information system. It would take approximately 1-hour per child to collect and enter this information (minimum, 10,000 hours of data collection and input, at \$50/hour = \$500,000). This is not inclusive of the amount of IT staff time that would be dedicated to developing business rules and writing the code necessary to support data collection. Because the actual request has not been submitted to our IT department for a formal cost estimate, the best approximate is that the following elements would take a minimum of 5,000 hours for completion. The hourly rate for the IT programmer is \$85/hour, so would cost approximately \$425,000. Finally, the amount of time and resources needed to train staff on collecting and entering the non-ICWA related items would take approximately 20 hours for the training development and associated materials (20 hours x \$65 = \$1300) and direct staff would each receive 2 hours in training (500 staff x 2 hours x \$50 hour = \$50,000). The total fiscal burden for Iowa for the non-ICWA related items is approximately \$976,300.

**Child's sexual orientation**

**Date/Time of Health Assessment**

**Developmental Delay/Disability**

**School Enrollment/Education stability/level**

**Pregnant as of the end of the report period**

**Ever fathered or bore children**

**Child and his/her child(ren) placed together at any point during the report period?**

**Prior adoption date**

**Prior guardianship date**

**Siblings in foster care**

**Siblings in living arrangement**

**Runaway/whereabouts unknown**

**Additional categories of abuse and neglect**

**Living Arrangement and Provider Information**

**Permanency Planning**

**General Exit Information**

**Child's relationship to adoptive parents**

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. If possible, provide specific cost and burden estimates related to the following areas:

There are approximately 200 **children who are in Iowa's foster care system annually** who are known to have ICWA status. The ICWA related elements in the new AFCARS rules are not included in our child welfare information system. It would take approximately 1-hour per child to collect and enter this information (minimum, 200 hours of data collection and input, at \$50/hour = \$10,000). This is not inclusive of the amount of IT staff time that would be dedicated to developing business rules and writing the code necessary to support data collection. Because the actual request has not been submitted to our IT department for a formal cost estimate, the best approximate is that the following elements would take a minimum of 4,500 hours for completion. The hourly rate for the IT programmer is \$85/hour, so would cost approximately \$382,500. Finally, the amount of time and resources needed to train staff on collecting and entering the ICWA related items would take approximately 20 hours for the training development and associated materials (20 hours x \$65 = \$1300) and direct staff would each receive 2 hours in training (500 staff x 2 hours x \$50 hour = \$50,000). The total fiscal burden for Iowa for the ICWA related items is approximately \$433,800.

- a. Reason to know a child is an "Indian Child" as defined in the Indian Child Welfare Act.**
- b. Application of ICWA.**
- c. Court determination that ICWA applies**
- d. Removals under ICWA.**
- e. Notification - ICWA**
- f. Voluntary/Involuntary termination/modification of parental rights under ICWA**
- g. First/Second adoptive parent or guardian tribal membership.**
- h. Request to transfer to tribal court - ICWA**
- i. Denial of transfer – ICWA**

In conclusion, the amount of resources that would be needed to develop our Child Welfare Information system, train staff and apply staff time to data collection does not warrant the benefit of requiring collection of data on these items. Iowa, like many states, is in the process of developing and designing our CCWIS to support our work force and ensure the data we are collecting is of sound quality. The current AFCARS rules being proposed would definitively impeded our ability to move forward with developing our future system. States are also in the process of dedicating resources and time to prepare for major system changes expected due to the Family First Prevention Services Act.