

Kansas respectively submits comments related to the cost and burden estimates for implementation of the AFCARS final rule.

Kansas does recognize areas of opportunity with the changes to AFCARS including new data elements added in the AFCARS rule. While these opportunities for additional data will assist in some areas, the high number of new data elements and requirements will add tremendous burden. For example, the new requirements will greatly increase the workload of the field staff charged with case management duties, working families toward reunification, safety and risk assessments and planning, adoption and other permanencies activities, and documentation of case files to satisfy compliance and oversight. A major concern is the massive amount of required information will very likely have negative impact on the quality of these work activities due to overburdening an already overly taxed staff. Kansas, like many other states, is experiencing a reduced workforce, so an additional concern is that many of these new data requirements are qualitative and best obtained in a case review. If implemented, it will likely reduce the reliability of our data due to “checkbox” like data collection. Some of the data elements this would include, but not limited to are:

- Health assessment information
- Educational data elements (stability, proximity, district/zoning rules, services/programs, etc.)
- Termination of parental rights petition
- Relationship of child to foster parent
- Active Efforts for ICWA children
- Available ICWA foster care and pre-adoptive placement data elements
- Available ICWA adoptive placements data elements

These changes will also be overly burdensome on staffing resources for design, implementation, training, data entry, compliance, quality assurance, and monitoring. For example, business automation and quality assurance resources are currently involved in multiple state and Federal initiatives such as CCWIS planning and CFSR PIP. These significant increases in data requirements would directly impact those already limited resources. Below are approximate staffing costs (excluding IT department costs) to implement the AFCARS changes for the first year and then ongoing.

Out of Home Care- Data File

	Hourly Wage	ICWA Cases Hours	All other Cases Hours	Total Annual Hours	Total Annual Cost
DCF & Provider Staff	\$23.88	1,778	33,010	34,788	\$830,737.44
FACTS Data Entry Staff	\$20.17	1,778	33,010	34,788	\$701,673.96
Training	\$33.38			15,685	\$523,565.30
System Automation Manager	\$44.12			11,658	\$514,350.96
Management Systems Analyst	\$44.12			8,986	\$396,462.32
Reporting	\$41.43			7,560	\$313,210.80
Estimated Kansas Cost FFY2020					\$3,280,000.78

	Hourly Wage	ICWA Cases Hours	All other Cases Hours	Total Annual Hours	Total Annual Cost
DCF & Provider Staff	\$23.88	1,781	33,060	34,842	\$832,015.26
FACTS Data Entry Staff	\$20.17	1,781	33,060	34,842	\$702,753.26
Training	\$33.38			11,764	\$392,673.98
System Automation Manager	\$44.12			8,744	\$385,763.22
Management Systems Analyst	\$44.12			6,740	\$297,346.74
Reporting	\$41.43			5,670	\$234,908.10
Estimated Kansas Cost Ongoing Years					\$2,845,460.55

Additionally, the increase in data elements will require Kansas to make massive and costly changes to our Child Welfare Information System (FACTS). Due to our IT department working other Federally Mandated work efforts, the IT cost for implementing the changes required to meet the new AFCARS data collection has not been fully researched. The estimate for updating the Kansas Child Welfare applications is approximately 10,000 hours. This includes documenting requirements, system design, construction, testing, and implementation. The hourly contractor rate is \$150 per hour, so the cost estimate to update the in house supported Child Welfare applications is \$1,500,000.

Kansas also has 3rd party vendors that support other applications which would require changes to add and extract data to supply AFCARS information. One vendor is in process of making major infrastructure changes to the KS Eligibility and Medicaid system within in the next year. We estimate the vendor would be able to complete the AFCARS in December 2020. The other vendor is also working on major initiatives with a deadline of June 2019. We estimate this vendor would be able to complete these AFCARS changes by December 2019. At this time, however, we are not able to provide a cost estimate for our 3rd party vendors.

Currently, DCF has interfaces with the Kansas Department of Corrections-Juvenile Services (KDOC-JS) system. KDOC-JS is in process of implementing a new system, so we are unable to estimate time and cost for KDOC-JS to make the required changes.

With all the changes Kansas, would be required to make to our in-house system, two 3rd party vendor initiatives and another state agency initiatives, the time estimate to complete and implement AFCAR requirements is over two years.

In conclusion, while Kansas does see benefit in some of the changes to AFCARS and data elements, it comes with a high cost (a minimum of 7.6 million dollars), a large number of resources, and additional duties being added to our already overburden staff. We are concerned of the possibility of harmful unintended consequences if resources are diverted away from providing services to vulnerable children and families in Kansas.