## Michigan Comment: Supplemental Notice of Proposed Rulemaking AFCARS Regulations to Collect and Report Data Elements Related to the Indian Child Welfare Act of 1978 June 13, 2018

The State of Michigan supports additional changes in the AFCARS data elements to improve reporting and provide a comprehensive national reporting system to track compliance with the Indian Child Welfare Act (ICWA). Through increased collection of ICWA-related data, ACF and Michigan may be able to enhance culturally-appropriate services for tribal children in foster care or who are adopted; assess relevant trends for American Indian/Alaska Native (AI/AN) families and improve child welfare training and technical assistance to local county offices, tribes, and private agency foster care providers.

## **Michigan Data Collection**

The Michigan Department of Health and Human Services (MDHHS) maintains a Statewide Automated Child Welfare Information System (MiSACWIS) which includes the majority of AFCARS ICWA details for foster care and adoption case management; enhancements must enable AFCARS ICWA reporting.

Modification to accommodate Adoption and Foster Care Analysis and Reporting System (AFCARS) 2022 reporting impacts 291 elements across all functional areas of the Michigan Statewide Automated Child Welfare Information System (MiSACWIS) and its related data warehouse reporting system. Approximately 42% of the additional data elements are related to new ICWA reporting requirements that would require new screen changes and additional training to child welfare staff. Training will need to be provided to users of the system regarding how to collect and enter the information.

The estimated cost for these modifications is \$1,200,000. The estimated time to implement the changes is considerable at more than 10,000 hours.