



Department of Public Health and Human Services

Child & Family Services Division ♦ 301 S. Park Avenue, 5th Floor ♦ Helena, MT 59604 ♦ fax: (406) 841-2487

Steve Bullock, Governor

Sheila Hogan, Director

June 13, 2018

Kathleen McHugh
Division of Policy
Children's Bureau,
Administration on Children, Youth and Families
1250 Maryland Ave., S.W., 8th Floor
Washington, D.C., 20024
Via the Internet: <http://www.regulations.gov/>

RE: Advanced Notice of Proposed Rule Making (ANPRM)
Adoption and Foster care Analysis and Reporting System (AFCARS)
Posted on: Federal Register/Vol. 83, No. 51/ Thursday, March 15, 2018

Dear Ms. McHugh:

On behalf of the State of Montana, Department of Public Health and Human Services, Child and Family Services Division, I would like to take this opportunity to comment on the Advanced Notice of Proposed Rulemaking (ANPRM) regarding the AFCARS regulations published in the Federal Register on March 15, 2018.

The State of Montana appreciates the opportunity to provide input toward the NPRM as it relates to the AFCARS changes that went into effect on January 13, 2017. Montana responded to the request for input regarding these changes in April 2015. At that time, we reported that it would take 10,000 hours of programmer time to implement all of the changes. ICWA changes were not calculated in that total and we have since determined that it would take an additional 4,000 hours of programmer time to include the ICWA requirements.

Montana has been working on adding the new requirements to our system of record (CAPS) and will continue to work toward compliance. Montana is also in the process of developing a new case management system which will ultimately become our system of record. Until that time, the state will need to balance our resources between our existing system and our new system to ensure adequate level of effort is being provided to ensure we are meeting the needs of the caseworkers in providing an intuitive system that will help guide practice and promote safety, permanency and well-being of the children and families while at the same time meeting our compliance requirements around data submissions. With that said, Montana continues to advocate toward a stronger emphasis on requiring data sharing with other agency's that already collect the data elements, utilize the courts in collecting the ICWA specific data elements, and increasing the time allowed to implement the remainder of the elements in order to maximize the systems change and enhancements required of both AFCARS and CCWIS.

Thank you for the opportunity to comment on the proposed AFCARS rules. I would like to reiterate my belief that access to improved and timely data can add value to child welfare systems. However, the ultimate impact of implementing the changes outlined in the NPRM as proposed is the loss of valuable time spent with children and families.

Please see our prior submission for additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Nikki Grossberg". The signature is fluid and cursive, with a large loop at the end.

Nikki Grossberg

Deputy Division Administrator, Child and Family Services Division

cc: Sheila Hogan, DPHHS Director
Laura Smith, DPHHS Economic Securities Branch Manager