



STATE OF NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES

ROY COOPER
GOVERNOR

MANDY COHEN, MD, MPH
SECRETARY

June 11, 2018

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

Re: RIN 0970-AC72 Adoption and Foster Care Analysis Reporting System (AFCARS) December
2016 Final Rule Comments

Ms. McHugh:

Thank you for the opportunity to provide additional comments related to the proposed implementation of new AFCARS data elements. North Carolina understands the importance of quality data collection in child welfare services, and we have reviewed the proposed indicators closely. We support the collection of data that represents the diverse backgrounds and experiences of children and families served. However, this interest must be balanced with programmatic, administrative, technological, and fiscal impacts that would create burdensome challenges for North Carolina's child welfare system.

Programmatic Impacts

Child welfare social workers currently have the burden of collecting existing federally-required data, as well as data required for state and local social services agencies. Diversifying the data collected on families and children would give greater insight into their unique needs. However, the newly proposed data elements would add to the extensive documentation requirements, as well as extend the time needed with clients to collect information. Some elements may require additional or recurring follow up which would require an additional burden on social workers' time. If these elements are implemented, it would be reasonable for questions to be non-duplicative and capture only what is necessary to improve outcomes for children and families. It would also be helpful to have guidance from ACF regarding best practices for navigating questions and conversations regarding sensitive topics such as those addressing gender identity and sexual orientation.

Administrative Impacts

The newly imposed data elements would necessitate the development and coordination new policies and practice guidance. Thereafter, training initiatives would need to be developed, geared toward educating thousands of statewide front-line social workers, supervisory, and administrative staff. Additionally, there is at least one data element that would require a statutory change in how we define certain categories of child maltreatment.

Data reliability is another issue. At least one of the data indicators are vague (e.g. drawing the distinction between a runaway and a child whose whereabouts are unknown) and could possibly result in incorrect data collection thus creating a data reliability issue. Another category that may yield unreliable data are the new sex trafficking elements. There is no new element for human trafficking and therefore, data regarding human trafficking may be incorrectly collected as sex trafficking.

Technological Impacts

North Carolina utilizes an electronic, statewide data collection system that captures information of those receiving child welfare and other social services across the state. North Carolina has an extremely low percentage of children and families in which ICWA is applicable. While we see value in collecting additional ICWA data, adding the 65 new data elements to our child welfare data collection systems would create a significant cost for tracking data on such a small number of children and families. New elements should be limited to those absolutely necessary in tracking and improving outcomes for children and families.

There are some newly proposed data elements that North Carolina currently collects as part of state and county data. However, there are costs associated with changes to our data collection system that would require modification of our current processes to accommodate the data collection for AFACRS purposes. In sum, any proposed changes to existing data elements, or the addition of new data elements related to the 2016 Final Rule would require labor and production costs that would easily exceed \$1,000,000 in addition to annual ongoing maintenance and programming costs.

Fiscal Impacts

The cumulative cost of modifying or adding data elements would have a significant impact on North Carolina's fiscal resources. Programmatic costs related to the administrative burden of collecting data include an increase in social worker time needed for administrative purposes and/or increase the amount of time needed with families for data collection purposes. This may cause a further burden on social workers' time and agency resources to meet the growing demands of data collection, and detract from direct service provision. There are costs associated with developing new statewide policies and guidance related to the data collection, as well as costs associated with development and delivery of training. Of equal importance are the costs related to the technological changes needed to collect the data. In sum, the collective fiscal impact of implementing these new changes could exceed \$3,000,000. Additional annual training and data collection costs would also have to be considered.

Conclusions

North Carolina understands the importance of collecting information on children and families served in our child welfare system. We must also balance this need with the fiscal, administrative, technological, and programmatic impacts increased data collection may have on our system, staff, resources, and most importantly, the children and families served. Resources that could be used for direct services to children and families may be diverted to manage the administrative and technological needs of implementing the newly proposed AFCARS data elements. As a result, we would respectfully ask ACF to consider refining the data elements and provide a more cost-efficient proposal for data elements that increase positive outcomes for children and families that do not result in burdensome data collection processes for the state and county child welfare systems of North Carolina.

Sincerely,

Michael Becketts

Michael Becketts

Assistant Secretary for Human Services