



**Department of  
Job and Family Services**

**John R. Kasich**, Governor  
**Cynthia C. Dungey**, Director

June 13, 2018

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

Re: RIN 0970-AC72 AFCARS December 2016 Final Rule Comments

Dear Ms. McHugh:

Thank you for the opportunity to provide additional comments on the implementation of the December 2016 Final Rule for AFCARS. The State of Ohio recognizes the value of robust data collection and reporting and has made continuous enhancements to its SACWIS to support improved data quality. However, Ohio also seeks to maintain a balance between caseworker focus on family safety and engagement and collecting data to support the enhancement of child welfare practice.

In examining the prospective impacts of the AFCARS changes, Ohio has determined that the impact on both fiscal and human resources will be substantial. Our initial estimate of the SACWIS enhancements required to enact the proposed changes would exceed 10,000 hours of development, testing, and implementation. The projected cost is estimated at over 1 million dollars for system changes alone.

Further, Ohio currently requires caseworkers to commit a substantial amount of time to ensure comprehensive data entry within its SACWIS. Although there is added value in documenting the additional elements, the burden on Ohio's caseworkers would increase if the December 2016 Final Rule for AFCARS is implemented. Ohio SACWIS Project is focused on enhancing SACWIS to provide more streamlined and efficient functional usability. Adding the additional 2016 Final Rule elements has the potential to detract from this critical goal.

AFCARS December 2016 Final Rule integrates 153 new AFCARS related data points. Of the 153 new data points, 65 of them are related to the Indian Child Welfare Act (ICWA). Ohio's population of children in care during FFY2017 who are eligible for a tribal affiliation is .03%. Of the children in care during FFY2017, no child has a tribal status of eligible. In

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light of the significant resources required to implement these changes, Ohio would like to respectfully submit that we are not in favor of additional changes to enhance ICWA-related functionality.

To support the goals of more robust data reporting efforts, Ohio is in favor of reporting to AFCARS select data that is currently entered into SACWIS by caseworkers. Ohio also supports the addition of data entry that would not require Ohio caseworkers to become overburdened and data enhancements that would not require substantial development resources and costs. Ohio is county administered and state supervised; therefore, a collaborative approach with Ohio's stakeholders would be required to fully define the enhancements that would fall under this proposal.

The addition of the elements identifying LGBTQ youth in foster care are helpful in assessing the need for additional and/or specialized services for this population, thus creating successful outcomes.

Thank you once again for the opportunity for Ohio to be a voice in the December 2016 Final Rule for AFCARS. Please feel free to contact our office with any questions regarding our state's comments.

Sincerely,



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