

State of Vermont
Department for Children and Families
Family Services Division
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Agency of Human Services

June 13, 2018

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

RE: Adoption and Foster Care Analysis and Reporting System (AFCARS) Advance Notice of Proposed Rulemaking (ANPRM) Docket number 2018-05042 (RIN number 0970-AC72)

Dear Ms. McHugh,

Thank you for the opportunity to provide additional comments related to the cost and burden estimates for implementation of the AFCARS rule. Vermont understands the federal reliance upon AFCARS data to improve child and family outcomes and Vermont generally, supports improvements by states to provide additional pertinent data through AFCARS reporting. As requested, this response attempts to provide burden and cost estimates to Vermont relating to the AFCARS final rule. In addition to estimating costs relating to data collection and data systems' modifications, we are also including information relating to anticipated delays to implementation of a Comprehensive Child Welfare Information System (CCWIS) by needing to comply with the AFCARS final rule.

Data Collection:

The new AFCARS requirements will require additional time on the part of child welfare staff to collect and report information. Using the ACF estimate of 3 hours per case at \$23.88 per hour to the existing and estimated new out-of-home care cases, Vermont estimates that the cost associated to data collection will be **\$311,634** over the first four years of implementation.

FFY	Existing Average Number of Children/Youth in Out-of-Home Care	Average Number of Children/Youth entering Out-of-Home Care	Number of Hours (cases x 3 hours)	Estimated Costs (hours x 23.88)
2020	1,350	750	6,300	\$ 150,444
2021		750	2,250	\$ 53,730
2022		750	2,250	\$ 53,730
2023		750	2,250	\$ 53,730



Data Systems and Extractions Modifications:

The new AFCARS requirements will require additional time on the part of child welfare information technology, project management, business analyst and program management staff to make the necessary revisions to our current data systems as well as our extraction file. In Vermont, there are protocols that must be followed when undertaking any substantial changes relating to our data systems. Substantial changes require the assignment of a project manager, business analyst and business lead in addition to the actual developer staff implementing changes. For Vermont, the addition of 153 data elements will require developer time to update existing fields, create new fields on existing screens as well as the development of new data collection screens. The addition of these data elements will require an estimated level of effort of 1,560 hours for a developer. Please note that this represents 9 months at 40 hours per week, however, current staffing levels will not allow for a single developer to be assigned full time for this project. Rather, this work will need to take place over the span of 18 months. All other staff time is estimated at 5 hours per week over 18 months. This represents a total cost of **\$112,063** over the two years leading up to AFCARS implementation.

Staff Role	Number of Hours	ACF Hourly Rate	Estimated Costs
Project Manager	390	\$44.12	\$ 17,207
Business Analyst	390	\$44.12	\$ 17,207
Business Lead	390	\$33.38	\$ 13,018
Developer	1,560	\$41.43	\$ 64,631

Comprehensive Child Welfare Information System (CCWIS):

As mentioned previously, the AFCARS final rule will require additional time on the part of child welfare information technology, project management, business analyst and program management staff to make the necessary significant revisions to our current data systems as well as our extraction file. Any staff time diverted to the implementation of the AFCARS rule will cause significant delay in our ability to move forward with planning and implementation of CCWIS. Delays in our CCWIS project will cause additional costs for Vermont related to staff time. Our existing data systems do not fully exchange information with each other which means that our staff spend additional time entering the same information in both systems. Additionally, staff experience significant redundancy in their work by needing to manually complete referrals, produce case plans, court documents and other case planning documents which are not currently part of our information system. Vermont is currently in the planning phase of our CCWIS project. Included in our planning around CCWIS is looking to our Agency of Education, Medicaid office and our Courts to establish data exchanges that will provide child welfare staff with important information involving the children and families we serve and be included in AFCARS. Given current workloads for our case worker staff, we are concerned about the additional time that will be necessary to collect information relating to education, medical and court. We believe the best path forward is to develop data exchanges as mentioned and our best way to incorporate these data exchanges is through our CCWIS project.

The total estimated burden to our state for implementation of the AFCARS final rule is **\$423,697**. This amount does not include costs relating to data collection of ICWA data elements, staff training, and the costs we will experience by delaying the work on our CCWIS project. Vermont urges that there be consideration for states who intend to move forward with CCWIS and allow for additional time to comply so as not to duplicate efforts and delay the goals of a CCWIS system – to significantly reduce redundancy, improve data exchanges, meet data quality standards and improve overall effectiveness.

Thank you again for the opportunity to provide comments relating to this ANPRM. Should there be an opportunity to do so, Vermont is also to participate in future discussions related to the implementation of the AFCARS rule.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Karen Shea', followed by a long horizontal flourish.

Karen Shea
Deputy Commissioner