State Response on ACF call to states regarding the proposed AFCARS modifications

ACF issued the following: "ACF is seeking public suggestions, in particular from state and tribal title IV-E agencies and Indian tribes and tribal consortiums and other stakeholders, for streamlining the Adoption and Foster Care Analysis and Reporting System (AFCARS) data elements and removing any undue burden related to reporting AFCARS."

"The Children's Bureau proposes to delay the compliance and effective dates in the Adoption and Foster Care Analysis and Reporting System (AFCARS) 2016 final rule for title IV-E agencies to comply with agency rules for an additional two fiscal years. We propose to delay the compliance and effective dates at the same time we seek public comment through an Advance Notice of Proposed Rulemaking (ANPRM), published elsewhere in this issue of the Federal Register, on suggestions to streamline the AFCARS data elements and remove any undue burden related to reporting AFCARS."

Response from West Virginia SACWIS/CCWIS Director

Like many states that have limited to no Native American involvement, I find the inclusion of all those ICWA data elements to be questionable in the larger context of child welfare. But from a big picture I can see the rationale, (even if I don't clearly see the value in all of that data) if you have that touch point with Native American Indian Tribes and are dealing with tribal law and authority in a particular case. However, this is where I see the undue burden, if you are not involved with an ICWA related case and have ruled out all indication of tribal affiliation, what possible benefit would any of us get from forcing states to collect, store and submit that data? Given the strict prohibition of defaulting any AFCARS element, it forces an already overloaded, overburdened, social worker to document each one of those 64 or so ICWA related data elements for each child to no discernible end, it forces the systems to include, support and pay for functionality to facilitate the collection, mapping and storage of the data in the transactional databases, it forces the state and even the fed to create and pay for additional storage and backup to hold all that non applicable, useless negative data. What is the benefit and how would anyone justify a CBA on this?

Now let's look at it from the practical stand point of worker management and getting social work staff to complete data for compliance reporting. The reality is that caseworkers are very, very busy people. The job has enormous stress at best and at times can be trauma inducing. They are barely getting the really important stuff documented accurately, reliably and timely. Throwing non-applicable, unnecessary busy work at them not only takes away valuable time and effort, it only reinforces their belief the entire exercise is useless and ultimately takes valuable time away from the important value added casework and documentation. That concept of wasted effort will percolate clean through the chain of command thus corrupt the very intent of trying to gather this kind of information in the first place; to inform policy and practice. I can just picture the supervisor telling new staff: "don't worry about any of this stuff I'll have the intern go through and hit no on all of it later."

As for the technology waste, the costs are tangible and can be measured. A CBA should be done to justify why an information system (meaning the actual IT system, the databases, data backups, stored extraction files, etc) should hold the superfluous data, if it doesn't meet a certain delta, how can any agency or government warrant that cost to their constituents? The solution here is to allow certain AFCARS elements, ICWA in particular, to be defaulted at a minimum so that when no tribal affiliation is indicated the elements can be left blank as not applicable. Better yet provided only when they are applicable; think of something like an ICWA addendum used and included as a separate reporting when

the tribal affiliation flag is set. It can have the same client identifier, submission and period indicator to allow it to link appropriately and consistently to the master file.   This would be a much more efficient use of the all the limited resources, in my opinion. Sorry Arizona, Oklahoma and Montana you still have to do a good bit of the reporting but at least they wouldn't have to do it with their entire FC/AS population. Could even incentivize tribal participation in the collection and documentation by giving Tribes and Reservations a financial stake in it.

And while we are at it why not take a hard look at the structure of the rest of the elements, how they are collected or in some cases not collected. It is my belief that the more abstracted AFCARS has become from the case records which the data is culled the less accurate and less engaged the workers, supervisors and mangers are in collecting it. A perfect example would be the way removal dates are calculated or the deliberate omission of title XIX placements. How many drug addicted infants are removed and immediately placed in family setting? None. AFCARS isn't showing you this and the caseworkers who are documenting their records are confused and burdened by trying to maintain the real record and a manufactured view of that record and the only good reason given is that they must satisfy a federal compliance report. Even this carries little weight because it's only one of many federal, or state compliance reports and they are often not consistent. Even federal Title IV-E eligibility and Medicaid reporting are not consistent and have led to caseworker confusion and documentation inaccuracies.

True story from the field: I was approached by a tenured supervisor of decent reputation and good practice, after the SACWIS and data analytics team had led a discussion on documenting Title IV-E eligibility, Title XIX compliance, AFCARS and NYTD is foster care records. She told me that it was impossible to teach and reinforce such variance and nuance to a young and learning workforce that typically only stay in these high burnout positions for 18 -24 months. She with all sincerity asked if there was a way to let caseworkers document assessment in mostly narrative, services in mostly narrative, contacts in mostly narrative, placement in mostly narrative, etc., and have the system identify through character recognition and language patterns the necessary data elements, then present them back to a worker or their supervisor to refine, add dates, tweak enough to satisfy the need for information and understanding. Now of course that kind of deep data decoding of unstructured data isn't feasible even for an IBM Watson at this time but perhaps some day it can be. In the mean time it is imperative on all of us trying to glean understanding out of human stories that are intrinsically narrative, sequential and fluid by nature, to work with that process and not become a barrier and burden to it. In our zest for information for accountability, informed evidence and statistically valid projections we have made the already difficult job of human services documentation impenetrable, unreliable and unknowable to those we rely upon to deliver it. We then bombard them with notifications, alerts, ticklers, reminders and prompts to produce it at all costs, expecting accuracy, reliability, consistency, timeliness, relevancy and conformity. I can't help but think we as the data professional need to do a better job at making the collection of data less about our job and more about theirs. After all isn't that why we are doing it in the first place?