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Voice for Adoption

SPEAKING OUT FOR OUR NATION'S WAITING CHILDREN



August 28, 2017

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Office of Planning, Research and Evaluation  
330 C Street SW  
Washington DC 20201  
Attn: ACF Reports Clearance Officer

by email: [infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov)

Voice for Adoption (VFA) offers the following comments in response to the June 30, 2017 *Federal Register* Request (Administration for Children and Families [OMB No.: 0970-0422] Proposed Information Collection Activity; Comment Request).

In the *Federal Register*, HHS requested comments on whether the proposed collection of information is necessary for the proper performance of the functions of the agency; the quality, utility, and clarity of the information to be collected; and ways to minimize the burden of the collection of information on respondents.

We at VFA strongly support the implementation of new data collection through the Adoption and Foster Care Analysis and Reporting System (AFCARS) as proposed in the final rule published in the *Federal Register* on December 14, 2016 (81 FR 90524). There have been many delays in the past, and we think it is now time to implement these well-thought improvements to data collection related to foster care and adoption.

There are several elements of the AFCARS revisions VFA would like to highlight:

### Longitudinal Data

While AFCARS point-in-time data is useful for the field, having more longitudinal data will certainly allow for a better understanding of a child's experience in care and provide invaluable information for use in decision-making regarding policy and practice in child welfare. Longitudinal data tends to provide both clarity and quality when examining what a child's experience is in care, and can be used to shed light on where new policies and practices may be needed. This change will enhance efforts to achieve improved outcomes for children and families.

### Indian Child Welfare Act

Currently, there is little useful data collected at either the state or federal level related to American Indian and Alaska Native (AI/AN) children who are under the custody of state child welfare authorities. Native children are overrepresented in many state foster care systems—in some places by as much as 10 times the general population. The federal protections that ICWA provides these children and their families have the potential to help reduce disproportionality and achieve permanency for more of these children.

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We have had no data collection specific to ICWA in the 35+ years since its enactment so these data elements are long overdue. The revised AFCAR rules will provide access to more detailed, case-level data at the federal level. By examining such data, we can improve technical assistance to states, allocate federal program resources more effectively, and help evaluate the extent to which states are working with tribes to successfully implement ICWA. This data collection will provide clarity about implement of ICWA and is necessary for quality enforcement of the law.

### **Sexual Orientation and Gender Identity**

Several studies have shown that lesbian, gay, bisexual, transgender, and questioning (LGBTQ) children and youth end are over-represented in foster care—in part due to their family’s rejection of them. We also know that these children and youth may face bias in foster care and lack placements where their safety and dignity is assured. To address these core issues, it is critically important that we collect data on the sexual orientation of children and youth in care and determine how their outcomes differ from other children. (We recommend that data on gender identity be collected as well.)

This data has great utility. It can be used to explore whether certain states’ policies or practices are shaping the experiences LGBTQ youth are having and identify areas of attention for the federal government. It also provides clarity on these young people’s experiences and how different state procedures may affect them.

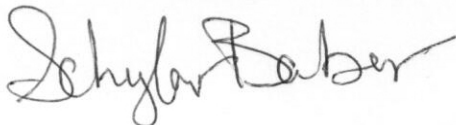
### **Other**

We also believe that states and the federal government can benefit from collecting and analyzing data on health, behavioral or mental health conditions; prior adoptions; sibling placements; environment at removal and child and family circumstances at removal; foster family home type and other living arrangements; and location of living arrangements. By collecting data on these key areas, we can determine if certain states are succeeding in ensuring safety, permanency, and well-being for children and how their successes can be replicated in other communities.

Although we know that data collection has significant costs, the costs of not knowing what is happening in our child welfare systems is far greater. We are spending billions of dollars to care for and protect children, and can learn much from the better about what is working and where further policy and practice changes are needed.

We urge HHS to follow through on the implementation of these new data requirements and to provide the necessary technical assistance to enhance state data collection and AFCARS systems.

Sincerely,



Schylar Baber  
Executive Director

