

February 21, 2024

Vermont Office of the Child, Youth, and Family Advocate (“OCYFA”)
Memo to Legislative Leadership re DCF Data System

Summary

- Vermont must immediately and fully fund a new data system (“CCWIS”) for the DCF Family Services Division. Cost of a new system is exponentially outweighed by cost of current systems, which put children in danger, significantly affect worker morale and productivity, and act as a barrier to uncapped federal money that keeps children in communities and out of foster care.

What is CCWIS?

- CCWIS stands for “Comprehensive Child Welfare Information System.” It is the modern standard for data collection in child welfare and the gateway to a host of innovative federal programs and money. CCWIS is a set of standards that each state can tailor to its needs.
- CCWIS would replace current DCF systems—SSMIS (1983), FSDNet (1990s). SSMIS is oldest system in nation. VT one of ~5 states w/ no CCWIS implementation. Feds first standardized data in 1993, offered 90% federal match, VT declined. In 2016, feds implement CCWIS.
- CCWIS systems keep children safe; provide child welfare staff with information to make informed decisions and take action to preserve families; support collaboration with other human service, health, and education programs/systems; facilitate efficient legal processes with accurate, timely information; promote continuous quality improvement; reduce costs for development and maintenance; open federal funding streams for innovative programs.
- CCWIS “not just IT project—affords opportunity to redesign life cycle of child welfare, improve outcomes for children and families through better data interoperability, modularity, quality.”
- A federal 50% match funds CCWIS development and administration and most IV-E programs.

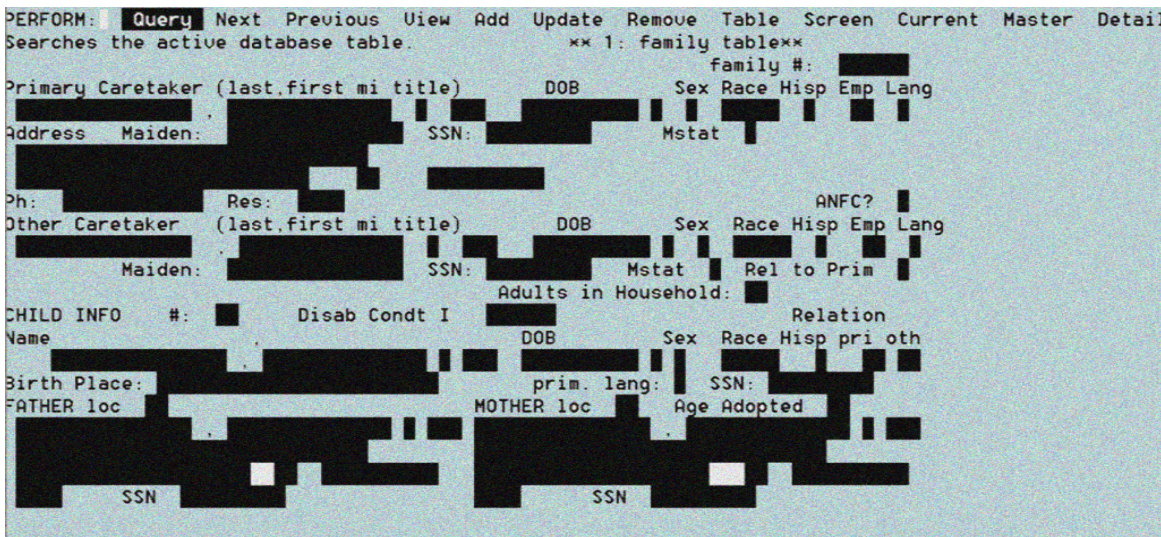


Figure 1: A Screenshot of DCF's Current System



What Doors Could Open for Vermont with a CCWIS?

- FFPSA (2018), amends Title IV-E of Social Security Act, longstanding uncapped source of federal revenue (~\$9 B annually), depends on CCWIS for documentation, audits, admin.
- FFPSA allows states to prioritize prevention over removal. Since 2018, continual rulemaking and policy changes enable new fed-funded programs for states, including:
 - Reg flexibility to keep children w/ kin, elevate youth voice in court, reduce congregate care.
 - Foster parent recruitment and retention strategies to reduce over-representation; enhanced LGBTQ support for youth and youth from diverse racial backgrounds; services responsive to families who have experienced domestic violence; supports and services for pregnant and parenting youth in foster care; high quality, evidence-based prevention services; extended foster care supports for transition-aged youth, including housing and education assistance.
- Legal support *for what we are already doing*: Cost of CHINS and delinquency attorneys; training and other supports for GALs (75% match); “multidisciplinary representation,” including social work support, peer navigators, investigators, experts, and interpreters; related “civil legal services” for families: housing, public benefits, RFAs.
- QRTP: Nationally, in 2019 more than 30% of youth in foster care ages 13 to 18 were living in group homes or institutional placements, with numbers even higher for Black youth.
- Fund prevention-focused professional development, education, and training for workers in child-related fields, including childcare providers, mental health clinicians, mentors, birth parents, foster/kin caregivers, DCF workers, treatment providers, and school personnel.

How Should We Think About the Cost of a New System?

- A new VT CCWIS would likely cost between \$20 and \$50 million, with VT paying half that cost.
- VT spends ~\$106 million each year on child welfare, including \$44 million from General Fund.
- CCWIS saves money throughout budget, e.g. \$65M DCF administrative budget, \$3.9M secure residential treatment budget, legal costs to Defender General, State’s Attorneys, courts (amounts unknown, unmeasured)—all reliant on General Fund.
- Costs of what we are not doing must also be factored in, e.g. few prevention services, thin legal supports lead to VT high rate of children coming into foster care, long stays in system—high costs and burdens on family productivity, residential care, courts, justice system.
- Vermont’s federal child welfare share increased 2018-2022 with fed FFPSA changes, but without CCWIS, fed share is set to fall dramatically in coming years. DCF facing audit risks and hearing negative signals from feds.
- When FFPSA changes went into effect in 2021, VT group care claiming went from ~\$184k per quarter (Q3 2020) to \$11.5k (Q4 2022), or \$3,500 per child, to \$500 on a per-child basis.

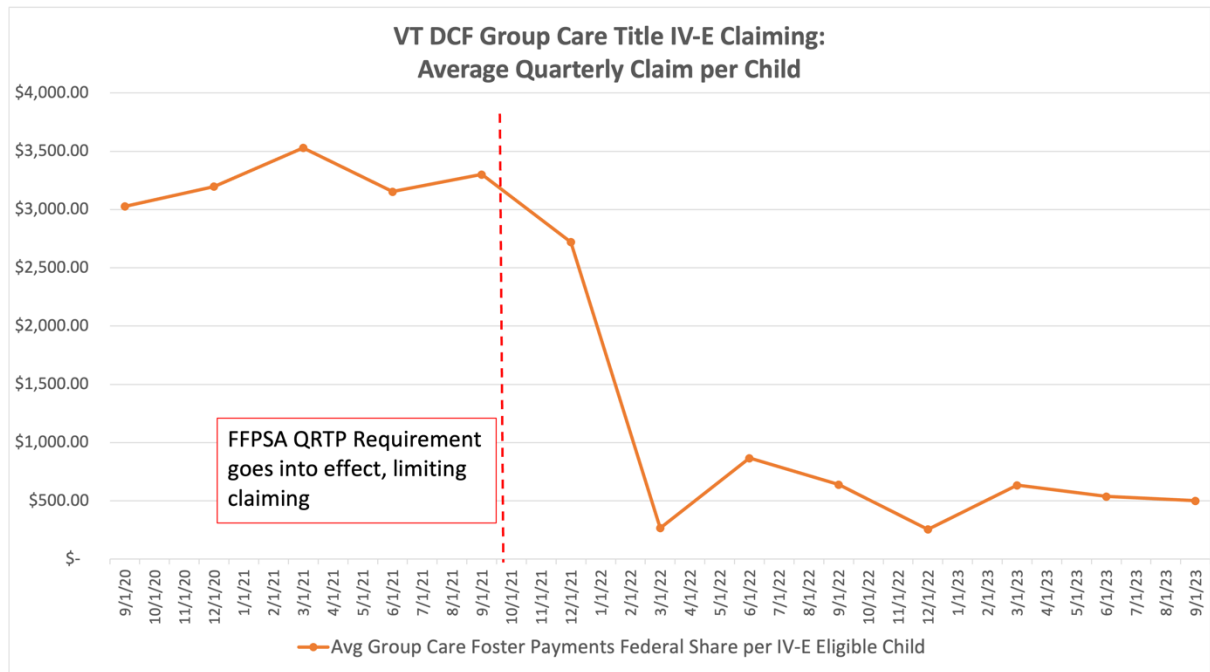


Figure 2: Vermont DCF Group Care Title IV-E Claiming: Average Quarterly Claim Per Child Over Time

Safety:

- In crisis (active shooter, medical crisis, credible threat), DCF cannot produce timely, accurate, digital information about where children are and what they need. Workers rely on paper.
- Foster parents lack accurate information. VTDigger: foster parent, paperwork says no allergies, child has EpiPen, serious allergy. Foster parent must rely on child to relay accurate information.
- DCF Deputy Commissioner “acknowledged that identifying where it has stored such information is sometimes difficult. ‘The address could be in case notes, which means that it’s going be harder to find. Obviously, the worker has the address for the child, which means we need to contact the worker to get the information. Or the district director may have it. Or it’s in a paper file at the district office. Or it’s in the worker’s telephone,’ she said. ‘So it’s not readily available sometimes, but it’s absolutely there.’”

Workforce Impact:

- OCYFA anonymous survey of DCF workers. Family Services Worker: “It is incredibly hard to use, still uses the escape button, doesn’t connect with a mouse. It is hard to move from one panel to another. When looking for historical information you often need to look in multiple locations to piece together a narrative of what actually occurred. ... Some pieces of FSDNet are simply not used, the risk assessments in FSDNet are not actually the risk assessments we use. When looking up intakes, they do not organize chronologically and don’t have a filter option, so to gather a full history, you need to write or type the information elsewhere to get a chronological understanding of a family’s involvement. This system is severely lacking in any organized way to identify family members, ICWA status or important events. For example, our cases are opened under custodial parents, most often mothers. I have no way of looking up a father and then



identifying that he has three children with different mothers. I also don't have a way of looking up addresses."

- Supervisor: "If a safety issue exists at [a placement] and I assigned to employee A, I have no way of looking up that address to see if any other employee is also working in that home/apartment with another family. SSMIS and FSDNet also don't speak to each other so we are often duplicating or triplicating our work. For example, if demographic information is wrong in the report and I find that out when I meet with a family, I then have to update this in FSDNet in the intake. I then need to tell admin to update in SSMIS. If I want childcare on that case, I then need to email all the demographic information to our childcare partners because even though they can "see" SSMIS on their end, when I [enter it], it doesn't show all of the information."
- DCF workers cannot upload pictures or videos to FSDNet due to crash risk. Visual information kept separately from written descriptions of same incident; during pandemic and recent flooding, DCF relied on individual physical notebooks with printed and handwritten information to know where children placed and ensure safety.
- Risk of cyber-ransom attack is extremely high. State would likely have to pay. CCWIS cost factor.

Mercedes, Advisory Council Member

- Identity is crucial for kids in foster care. Identity documents a central part of that.
- DCF used wrong SSN for Mercedes for years. Mistake replicated continually: ACT, PSAT, FAFSA.
- Only fixed when M applied for first job, could not start until issue fixed, had to obtain new card.

Conclusion

- There are many VT data systems that require upgrading, but CCWIS is the top priority. The consequences of inaction threaten the lives of children the state is legally parenting. We remove children from homes of origin for safety—state must be accountable too.
- CCWIS will improve DCF standing in communities. Prevention services, kin support, peer navigators keep children in their homes of origin. Birth parent: "A strong relationship between a birth parent and foster parent can make a huge difference for a child and their birth family. I think it is awesome to know that your child is safe. I especially appreciate that the foster parent wants to know what practices I use to care for my child. I also have some comfort knowing that the foster parent cares about me. In this way, I can move forward with my own healing and also work on a plan for a better life for me and my family."

Resources:

- [OCYFA report on a new CCWIS for Vermont](#)
- [VT Digger Article on Vermont's Current System - Lola Duffort](#)
- OCYFA [Annual Report Executive Summary](#) and [Full Report](#)
- Quote and info page 1: <https://eccovia.com/blog/what-is-ccwis/>
- Birth parent quote in conclusion: [Shana Hunts Along](#)
- [VT Child Welfare Financing Report, Child Trends](#)
- OCYFA [website tracking CCWIS](#) work in VT