

RURAL AREA FLEXIBILITY ANALYSIS

1. Types and Estimated Numbers of Rural Areas:

The proposed regulations would affect those public and private agencies located in rural areas that contract with social services districts to provide foster care, adoption and preventive services. Currently, there are approximately 100 such agencies located in counties with a population of less than 200,000. The regulations also will affect those social services districts that are located in rural areas.

2. Reporting, Recordkeeping and Other Compliance Requirements, and Professional Services:

Applicable public and private child welfare agencies and social services districts will be required to comply with the standards and requirements set forth in the regulations for implementing the statewide automated child welfare information system (SACWIS), known as CONNECTIONS in New York State, in accordance with State and federal law. The standards include mandated reporting, internal and external data confidentiality standards, and record retention requirements.

Social services districts and the applicable public and private child welfare agencies will not have to hire additional staff to implement the regulations. Existing case workers and other district staff who will be required to enter data into CONNECTIONS will be comprehensively trained to use the automated tools and capabilities the system provides. In addition, current training programs will be enhanced to emphasize the casework support that CONNECTIONS will bring. The social services districts and applicable public and private child welfare agencies also already have staff acting as security coordinators for CONNECTIONS.

3. Costs:

Section 446 of the SSL requires both the implementation of CONNECTIONS and the promulgation of regulations for the timely recording of child welfare services data in CONNECTIONS. The fiscal impact of the development and operation of CONNECTIONS is the result of these statutory requirements. The costs for developing CONNECTIONS will be a combination of federal and state dollars. To date, State funds have been used to cover the costs that are not federally reimbursable.

Caseworkers are currently required to document in other computer systems and/or paper format the information that these regulations require be inputted into CONNECTIONS. Therefore, there is no fiscal impact anticipated for social services districts or other public and private child welfare services agencies as a result of the reporting requirements included in the proposed regulations. All other requirements are administrative in nature and, as a result, are not anticipated to have a fiscal impact.

5. Minimizing Adverse Impact:

All applicable public and private child welfare agencies and the social services districts have been provided the personal and laptop computers, printers, servers and other hardware and software necessary to access and use CONNECTIONS. CONNECTIONS will enable the federal AFCARS reporting requirements to be accommodated in a way so that the prescribed data is interwoven within the case flow process, while the actual reporting is compiled and accomplished by the State. Automated cues and reports will assist and remind workers, supervisors and administrators of coming due and overdue activities, assisting not only with AFCARS reporting, but in verifying compliance with other federal and State legal requirements.

5. Rural Area Participation:

Since the inception of CONNECTIONS, information on the system's development and operation has been shared with social services districts and the applicable public and private child welfare agencies through written materials, face-to-face focus groups and meetings, teleconferences, surveys and questionnaires. In addition, OCFS established Steering and Management Committees and numerous work groups to assist in developing the conceptual and detailed design of the CONNECTIONS' software applications. The Council of Family and Child Caring Agencies (COFCCA), an organization that represents most of the private child welfare agencies along with individual representatives from some of those agencies, including agencies located in rural areas, participated on the Committee and work groups. Representatives of social services districts also participated in the design process. The ideas, opinions, suggestions and assistance of these stakeholders were instrumental in the decisions made at every phase of this project. The reporting and record keeping requirements set forth in the regulations will be implemented according to the design decisions that have been made through that process.