

**Arizona
AFCARS
Assessment Review
Report**

February 2010

**Prepared by:
Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

TABLE OF CONTENTS

Background	1
Rating Factors	2
Findings	4
General Requirements	4
Data Elements	6
Conclusion	8
Tab A Detailed Findings	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	
Section 3: Case Files	
Tab B AFCARS Improvement Plan	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	

BACKGROUND

Federal law and regulation require States operating programs under title IV-E of the Social Security Act (the Act) to submit data to the Adoption and Foster Care Analysis and Reporting System (AFCARS). The data are to be collected on children in foster care and those who have been adopted under the auspices of the State child welfare agency. States that fail to meet any of the standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial compliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E State plan, and are subject to penalties¹. Additionally, States that received funding to develop, implement, and operate a Statewide Automated Child Welfare Information System (SACWIS) under Federal regulations at 45 CFR 1355.53 are to produce a comprehensive, effective, and efficient system to improve the program management and administration of the State plans for titles IV-B and IV-E of the Social Security Act. At a minimum, the system must provide for effective management, tracking, and reporting by providing automated procedures and processes to, among other things, meet the adoption and foster care reporting requirements through the collection, maintenance, integrity checking, and electronic transmission of the data elements specified by the AFCARS requirements.

The Children's Bureau is committed to assisting States to develop statewide child welfare information systems and to collect quality data. To this end, SACWIS and AFCARS Assessment Reviews were developed to assure that the systems support the management of the programs under titles IV-B and IV-E and can produce accurate and reliable foster care and adoption data. AFCARS Assessment Reviews (AAR) are conducted in every State, regardless of whether a State operates a SACWIS. The State's information system is assessed against the AFCARS requirements in the Federal regulations, policy issuances, and the AFCARS Technical Bulletins. The AAR evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Children's Bureau. A second focus of the AAR is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and examines the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data are also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data

¹ The Administration for Children and Families is not assessing AFCARS penalties at this time (see ACYF-CB-IM-02-03) and will not take penalties until new, final AFCARS regulations are issued implementing P.L. 108-145 (The Adoption Promotion Act of 2003).

conversion process (if applicable) and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed for overall data quality, to determine whether the State is meeting the AFCARS definitions for the information required, and to determine whether the correct data are being entered and extracted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timely entry of certain data elements, and for whether the data meets a 90 percent level of tolerance for missing data and internal consistency checks. However, “substantial” compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been “penalty-free,” and yet does not have accurate and reliable quality data. For example, edit checks of the data cannot determine whether the State submitted the correct foster care population required by the Federal regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of zero (the system is not collecting the AFCARS data elements and the data are not transmitted) to four (fully meets the AFCARS standards) is used to assign a rating factor. Exhibit 1 is a chart that lists the factors that were used for the analysis of the State’s AFCARS.

For data elements and general requirements that do not meet existing AFCARS standards (rating factors 0 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due both to system issues and to caseworker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system. Once the corrections are made to the system, the data will be re-analyzed. If problems related to caseworker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State levels, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

AFCARS Rating Factors

RATING FACTOR	DEFINITION
4	All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.
3	<p>There are data quality issues. For example:</p> <ul style="list-style-type: none"> • The data are underreported due to inconsistent data entry. • The data are not being entered. • Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens. • There are no supervisory controls for ensuring data entry, or accurate data entry. • There is incorrect data entry due to training or design issues. • There are missing or incomplete data due to conversion errors.
2	<p>The technical requirements for AFCARS reporting are not fully met. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability to collect the data, but the program logic is incorrect. • The State uses defaults for blank information. • Information is coming from the wrong module or field in the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information. • The extraction code for the AFCARS report selects and reports incorrect data.
1	<p>An AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the information. • There is 100% missing data according to the frequency report or DCU/DQU reports.
0	States operating an automated information system for which they received SACWIS-level FFP were found to be using an external automated information system, or a database (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS system. In addition, there is no program code for the extraction of data from the SACWIS.

FINDINGS

The State's SACWIS, Children's Information Library and Data Source (CHILDS) was implemented in 1997. The State team indicated they prioritize SACWIS enhancements on a quarterly basis. Currently, the State's emphasis is on implementing the National Youth in Transition Database (NYTD) elements into their system. Additionally, the State is trying to streamline the system for the worker. The State team indicated that since implementing CHILDS there has been a struggle around the extent to which fields should be mandatory.

The State implemented an innovative approach to collecting the AFCARS information related to the circumstances associated with a child's removal from home (foster care elements #26 - 40). In November 2007, the State implemented an integrated investigation/case plan. Strengths and risk assessment for the family is documented in the investigation/case plan and it is through this process that the conditions associated with a child's removal are recorded. These screens are filled out at the time of the removal and every six months. The system allows the worker to record identified risk factors at various points during the life of the case and freezes the information so that they can be reported for the particular period in the life of the case.

The State collects information on a person's Tribal affiliation. The list though is a partial list of Tribes. The State should modify the list to contain all Federally recognized Tribes in order to identify a Tribal person for the Indian Child Welfare Act (ICWA) requirements.

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, and the onsite notes were assessed to make the final determination of findings. This section contains a summary of the significant reporting and data quality issues that were found during the AAR. The State should carefully review all the findings in each document as there have been some changes from the onsite findings. For additional information on specific issues for the general requirements and the data elements, please see the attached matrices. The AFCARS data used for the review were from the report period October 1, 2008 - March 31, 2009 (2009A). The charts below summarize the rating factors for the General Requirements and the Data Elements.

General Requirements (23)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (12)
4	4	3	8
3	3	0	2
2	1	0	2
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	28 (42%)	12 (32%)	40 (39%)
3	16 (24%)	11 (30%)	27 (26%)
2	22 (33%)	14 (38%)	36 (35%)
1	0	0	0

During the post-site visit phase, the State made several corrections to the extraction code based on the preliminary findings of the onsite review. These revisions were submitted to the Children's Bureau in time to be incorporated into the final findings. In many instances these corrections resulted in a change of the rating factor that was given during the onsite review. The findings matrix in Tab A reports the previous rating with a "strike-through" and the new rating. The AFCARS Improvement Plan (AIP) in Tab B contains the final rating factor. The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and supervisory oversight to ensure timeliness of data entry.

General Requirements

Reporting Populations

Foster Care

Removal episodes of less than 24 hours are not to be included in the AFCARS foster care file. The State is partially meeting this requirement; the extraction code excludes removal episodes that begin and end on the same day. Currently, records in which the removal and discharge dates are on two consecutive days, and the length of stay in foster care is less than 24 hours, are incorrectly included in the AFCARS foster care population. In addition to this being an issue under the reporting population, it is also an issue for the foster care elements related to dates of a removal episode and the number of removals (foster care elements #18 - 20). If a child enters foster care for more than 24 hours, and has information in the system of an episode that began one day and ended the next, the AFCARS data will now reflect two removal episodes instead of one. In order to accurately reflect the total number of removals that meet the AFCARS standards, the State needs to add a clock field to both the removal status and legal status. The program code would use these fields to determine whether the child's removal was for less than 24 hours and exclude all removal episodes that are for 24 hours or less from the population. Once that episode is excluded, it would not be included in the count of the number of removals from home.

A second issue with the foster care reporting population is that the State is incorrectly including youth over the age of 18, or 19 if the child is eligible for title IV-E funds. The State will need to develop a method to report these youth as discharged as of their 18th birthday, or the day on which the youth is no longer eligible for title IV-E. The discharge reason to be reported is "emancipation."

Adoption

The Children's Bureau noted that in all three years shown on the State's Child and Family Services Review (CFSR) Data Profile (FYs 2007-2008, and 2009A), Arizona reported fewer adoptions in the adoption file than in their foster care file. This is very unusual and the State and Federal AAR team identified a probable cause that the State needs to address. Even though the adoption file is not used in the calculations for the State's outcomes in the Data Profile, the adoption file is used to determine the number of adoptions for the purpose of the Adoption

Incentive Payment Program. The extraction code picks up the effective date from the legal status table which is not the date of the adoption finalization. Consequently, some adoptions do not get reported if they are entered in the reporting period after the adoption is finalized. There are three possible solutions:

- 1) Resubmit the adoption file on a regular basis.
- 2) Add an indicator that marks those records that have been transmitted. The extraction code would be modified to check for adoptions that occurred prior to the end of the report period being submitted that have not been flagged by the indicator.
- 3) Add a transaction date to the legalization date of the adoption. This date would be used to extract the adoption files.

Any of these approaches would assure that all of the State's adoptions are used when the Children's Bureau determines the adoption incentive payments.

Technical Requirements

The State is not correctly extracting the files for the purposes of a subsequent² submission. One of the technical requirements for reporting the foster care and adoption files is that the data must be extracted from the data system as of the last day of the reporting period (45 CFR 1355.40(b)(1)). This means that data that are entered after the last day of the data collection cycle are not to be included in the "regular"³ file. For subsequent files, the data extracted are to reflect the circumstances of the case for the report period being submitted. For instance, if a State is re-submitting the data for the period April 1, 2006 – September 30, 2006 (2006B) on July 2, 2007 the data is to reflect the events of the case for the 2006B report period. This means that if the child had a periodic review that occurred on May 5, 2006 that is the date to be reported for foster care element #5, date of recent periodic review. If the child's case plan goal was reunification during the 2006B timeframe, but as of July 2, 2007 the goal is adoption, the case plan for 2006B must be reunification. The State's current extraction process would be reporting newer information for many of the data elements. This has implications for the data used in the Child and Family Services Review Data Profile, the Child Welfare Outcomes Report to Congress, and other analysis done by the Children's Bureau.

Data Elements

Placement Count (foster care element #24)

The State appears to be over-counting placements. One of the reasons is that the extraction code does not exclude hospitalizations that are for acute care. Additionally, based on findings from the case file review, it appears that when the status of a placement changes, such as from a foster home to a pre-adoptive home or if there is a change in the license, then the date of the placement is incorrectly reported.

² Submissions that are received after the AFCARS due dates for a regular report (May 15 or November 14) are considered subsequent data files.

³ An AFCARS State data file for a current report period that is submitted during the appropriate transmission time frame, April 1- May 15 and October 1-November 14.

Determination of a child's special needs and the basis of the special need (adoption element #10)

The Adoption Characteristics screen has a "Special Needs" field with the following options: race/origin, sibling group, age, and conditions. However, there is not a field to collect State-defined special needs, for instance if a child is at-risk of developing a health or mental health condition later in life. The State team indicated they do identify a child as special needs due to "at-risk" conditions. These are being entered incorrectly as "medical conditions or mental, physical or emotional disabilities." The State needs to modify the screen to allow for other types of special needs as defined by the State.

Another issue with the collection of the special needs information is that while the caseworker is able to select all applicable reasons for determining that the child has special needs there is no way to indicate the primary basis of special needs. Instead, the extraction code is determining the primary basis of special needs based on a hierarchy of what was selected (i.e, if medical conditions and age are selected, then the code reports medical conditions). A method needs to be developed to allow the caseworker to select on the screen the primary basis for special needs. The extraction code will then need to be modified to extract the choice on the screen.

CONCLUSION

Overall, the State has a good approach to collecting its AFCARS data and in general is reporting accurate data. The State runs management reports on a regular basis to assess the quality of the data in the system and also uses the data in management reports used to evaluate its programs.

While there are some remaining corrections to be made to the information system or the extraction code, many of these are minor. There are some significant changes that remain that will require more time and resources. These include the addition of a time field associated with the time of a child's removal from and return to home, as well as collecting all relationships that exist between the child and their adoptive parents.

Due to corrections that are needed for the foster care elements, the State will have to resubmit AFCARS data for past report periods. The State and the Children's Bureau will discuss which reports will be required for resubmission. One factor that will be taken into consideration is the report periods used for the State's current Child and Family Services Review Program Improvement Plan.

Within 30 calendar days after the receipt of this report and the attached AIP, the State staff must submit the AIP electronically to the Children's Bureau with estimated due dates for completing the tasks in the AIP. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to the Children's Bureau. Once the Children's Bureau and the State agree that the quality of the data has improved, and all tasks and revisions to the extraction code have been reviewed and approved, the State will receive a letter summarizing the final results of the review. Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Child and Family Services Plan and Annual Progress and Services Report as part of the information required by 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The Regional Office will work with the State to determine if technical assistance is needed and available, to implement the AFCARS Improvement Plan (AIP). The State may obtain technical assistance from the Children's Bureau's Network of Training and Technical Assistance Centers.