

Delaware AFCARS Assessment Report

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Executive Summary

From September 16 – 20, 2002 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region III, and the Office of Information Services (OIS) conducted an assessment review of Delaware’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was October 1, 2001 through March 31, 2002.

Two major areas are assessed as part of an AFCARS assessment review: the AFCARS general requirements and 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 on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale.

Strengths identified by the Federal review team during the review include:

- The State converted historical information on open cases.
- The State is correctly reporting the adoption population.
- The State is reporting private agency adoptions.
- The State has a good method to collect primary and secondary special needs information.

The State is in full compliance with the technical general requirements. However, the State is not in full compliance with the foster care reporting population. The State title IV-B/IV-E agency (Department of Services to Children, Youth, and their Families (DCYF)), includes the Division of Family Services (DFS), the Division of Youth Rehabilitative Services (YRS) and the Division of Child Mental Health (CMH). The State is appropriately including the DFS and YRS population in the AFCARS, but not the CMH children that are placed in out-of-home care under DCYF’s responsibility for care, placement, or supervision.

Another issue identified with the foster care population relates to those children that are returned to their home while the agency retains responsibility for placement, care or supervision. Children that are returned home under these circumstances for a specified period of time must be included in the AFCARS report until the agency no longer has responsibility for the child. If the child is returned home for a non-specified period of time, after six months the child is no longer part of the AFCARS population, in accordance with ACF policy. The agency should report the child as “discharged” and include the appropriate outcome reason.

Based on the on-site findings and the post-site visit analysis, 32% (21) of the foster care and 54% (20) of the adoption elements are correctly reported, and 50 percent (33) of the foster care and 24 percent (9) of the adoption data elements require system modifications. In addition, 18 percent

(12) of the foster care and 22 percent (8) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve.

The data elements that will require the most significant system modifications are: race/Hispanic origin, diagnosed disabilities, previously adopted, date of current placement setting, and the most recent case plan goal. In regard to the information on disabilities and previous adoptions, the State's method of collecting and extracting the data are giving a false "no" response. If the appropriate information is not selected and is left blank, the program code maps this to a "no." Therefore, one cannot ascertain if this is a true "no," or simply information that the worker has not completed or updated.

A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings Matrices" for the foster care and adoption data elements, and the general requirements (Tab B). Some rating factors differ from those given on the draft findings matrices left with the State, due to further post-site visit analysis. The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab C).

Within 30 calendar days after the receipt of this report and the attached AFCARS improvement plan, State staff are requested to contact the ACF Regional Office to set due dates for completing the tasks in the improvement plan. Test cases will be provided to the State once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children's Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS Improvement Plan. No further on-site reviews will be conducted unless ACF receives information questioning the quality of the State's data, and it is determined that an on-site visit is necessary.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review process was developed. The AFCARS assessment review evaluates a State's information system's capability to accurately collect, extract, and transmit the AFCARS data to the Administration for Children and Families (ACF). The system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. A second focus of the AFCARS review is to assess the State's child welfare staff's ability to collect and document information accurately 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 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. During the review, the Federal team identifies improvements to be made to the system, and recommends changes to the program code used to extract the AFCARS data.

Each assessment review consists of a thorough analysis of the State's system program 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 is also compared against a small randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are assessed 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 to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

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 timeliness of data entry of certain data elements, and whether the data meets a 90% 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, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the 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 one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Tab A includes 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 (factors 1 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 to both system issues and case worker data entry issues. In such instances, the element will be rated a "2" to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker 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.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a "2" will be assigned. If it appears the problem is due to data entry, then a "3" will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor, because incorrect programming logic could affect the related data elements.

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 level, the State must implement the AFCARS Improvement Plan, under Tab C of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State's AFCARS data collection. Tab B provides detailed information on the findings for each of the foster care and adoption data elements, the general AFCARS requirements, and the case file review. The AFCARS reporting period under review was October 1, 2001 through March 31, 2002 (2002A).

As part of the post-site visit analysis the State's documents, the data, the case file review findings, and team member notes are assessed to make the final determination of findings. As a result, some of the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab B reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab C contains the final rating factor. Several changes to the rating factors were made due to the findings from the paper case file review.

Strengths

Strengths identified by the Federal review team during the review include:

- The State converted historical information on open cases.
- The State is correctly reporting the adoption population.
- The State is reporting private agency adoptions.
- The State has a good method to collect primary and secondary special needs information.

Based on the on-site findings and the post-site visit analysis, 32% (21) of the foster care and 51% (19) of the adoption elements are reported correctly. The State includes youth under the Division of Youth Services that are in out of home placements for whom the title IV-B/IV-E agency has responsibility for care, placement, or supervision.

General Requirements - Population Errors

The AFCARS foster care population must include all children under the placement, care or supervision of the State agency. This includes all children who are required to be provided the protections included in section 422(b)(10) of the Social Security Act (the Act). The Delaware Department of Services to Children, Youth, and their Families (DCYF), includes the Division of Family Services (DFS), the Division of Youth Rehabilitative Services (YRS) and the Division of Child Mental Health (CMH). If the State agency (DCYF) has responsibility for the care, placement, or supervision of children then, regardless of which Division has primary responsibility, information on these children must be reported to AFCARS. Currently, the State includes in its AFCARS population those children placed through DFS and YRS. The State must include CMH children that are in the agency's care and placement responsibility and are in out-of-home foster care placements.

Also, children who have been in foster care and are returned to their home while under the placement, care, or supervision of the State agency must be included in the AFCARS population. If the child has been returned home for a specified period of time, then the State includes them in the population for that period of time. If a time period is not specified, then the agency continues reporting that child in the AFCARS population for up to six months. If the agency's responsibility for placement, care, or supervision is terminated by the court prior to six months, then the date of termination is entered as the discharge date. Otherwise, if the non-specified period of time extends beyond six months, the agency is to enter the date on which the child has been in its own home for six months as the discharge date.

The State has been reporting these children with discharge dates at the time they are returned home and not according to the above guidelines. The State must include these children in the AFCARS report as appropriate, and according to the criteria listed in the previous paragraph.

There are several issues that relate to the reporting of juvenile justice youth. The issues are addressed in the findings matrices. Most of the issues are in regard to how the State reports the start and end of the removal episode, counting placements, and diagnosed disabilities. During the on-site review not all of the State staff's questions and concerns may have been addressed.

The State may want to consider having the National Resource Center for Information Technology in Child Welfare provide on-site technical assistance in this area.

Data Element Errors

Based on the on-site findings and the post-site visit analysis, 50 percent (33) of the foster care and 27 percent (10) of the adoption data elements require system modifications. Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data, and assess its validity prior to submitting it to ACF. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility.

- Information on Race and Hispanic and Latino Origin (foster care elements number #9 -10, #52 – 55 and adoption elements number #7 – 8, #25 – 28)

The State does not collect data or report whether an individual considers him/herself to be more than one race. The State's information system, Family and Child Tracking System (FACTS), is designed to allow workers to enter only one race, not multiple races. The system must be modified to allow workers to select more than one race, as appropriate, for children, foster parents and adoptive parents. Also, "unable to determine" is not an option for workers to select on the data entry screen. The definition of "unable to determine" is:

"The specific race category is 'unable to determine' because the child is very young or is severely disabled and no person is available to identify the child's race. 'Unable to determine' is also used if the parent, relative or guardian is unwilling to identify the child's race." Or, in the case of adults, "...is unwilling to identify his or her race or ethnicity."

The State must modify the screens by adding "unable to determine" as an option and train workers on the appropriate use of this value.

- Information on Children Diagnosed with Disabilities (foster care elements #10-15)

The State and Federal teams agreed that the State's number of children in foster care that are diagnosed with a disability are under-reported in AFCARS. This may be due to the way the system is designed to capture disability information. FACTS does not have the question "Has the child been clinically diagnosed as having a disability?" Instead, the response to this question (AFCARS FC element #10) is based on the worker selecting one of the disabilities on the screen. If none of the conditions are checked, then the program code maps blank information to "no." This results in a response of a false "no." For AFCARS purposes, "no" indicates that "a qualified professional has conducted a clinical assessment of the child and has determined that the child has no disabilities." Alternately, "not yet determined" indicates that "a clinical assessment of the child by a qualified professional has not been conducted." The State must modify the system to include this question and the values "yes," "no," and "not yet determined."

This will provide more accurate information regarding whether a medical or psychological professional has seen a child.

There are some conditions that could be reported to AFCARS that the State is not mapping. The detailed findings and the AFCARS Improvement Plan list some options the State may consider when making system design changes.

- Information on whether a child was previously adopted (foster care elements #16 - 17)

This is information that the caseworkers are required to provide. However, there is not an option for the value “unable to determine.” Instead, if a child is abandoned, the worker selects “no.” This is not the correct use of this value. “No” should only be used if the worker has assessed that the child has never been adopted, either through a private or public agency, prior to entering the current foster care episode. If the child was abandoned and there is no one available to provide this information, then the response to elements #16 and 17 is “unable to determine.” The State must modify its system to include an option for the value “unable to determine.”

- Date of placement in the current foster care setting (foster care element #23)

At the time of the State’s AFCARS assessment review, the State was reporting this date in accordance with Federal policy effective at that time. However, as of October 1, 2002, the State must collect and report the actual dates that a child is on runaway status from a foster setting, or the date the child returns home while under the care, placement, or supervision of the State. The State will want to implement training for caseworkers to ensure these dates are entered into the system.

- Number of previous placement settings in the current episode (foster care element #24)

The State is not including all placement settings in the count of placements. During the on-site review, it was determined that the program code is not counting either the initial or the current placement. As a result, the number of placement settings for a child is being under-reported.

Also, the State should refer to policy guidance in the Children’s Bureau Child Welfare Policy Manual that was issued on July 5, 2002 (Section 1, AFCARS, subsection 2B.7). The policy guidance addresses what should be counted and not counted for this element. The following temporary living conditions are not placements in the calculation of the number of previous placement settings for foster care element #24.

- Visitation with a sibling, relative, or other caretaker (i.e., preplacement visits with a subsequent foster care provider or preadoptive parents);
- Hospitalization for medical treatment, acute psychiatric episodes or diagnosis;
- Respite care;
- Day or summer camps;
- Trial home visits; and
- Runaway episodes.

- Information on the most recent case plan (foster care element #43)

The State is to report the most recent case plan for the current removal episode. The State's program code checks for a case plan goal for the current placement setting, but is not extracting all case plans.

- Information on sources of Federal support/assistance for the child (foster care elements #59 - 65)

The requirement for these elements is to report if a payment has been made on behalf of the child during the six-month report period. Instead, the State is reporting if the child is eligible for one of these sources of income. This has specific implications for the title IV-E foster care reviews. The State must correct the program code to extract the correct data, and resubmit the appropriate report period, prior to the State's title IV-E review.

Data Quality

Eighteen percent (12) of the foster care and 22 percent (8) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve. The majority of the data quality issues are due to timely entry of data by caseworkers, and keeping the information up-to-date.

One area that needs correcting will require new guidance to be given to caseworkers. Caseworkers are using a generic date (1111) when dates of birth are not known for the child's biological mother and father. Workers should enter an appropriate approximate date of birth if the exact date is not known (the day should be the 15th of the month).

Once changes are made to the program code and/or to the data entry screens, the quality of the data will need to be monitored for accuracy. It may be necessary to implement additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review (see AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E).

CONCLUSION

There are several system modifications (either to the screens or to the program code that extracts the AFCARS data) that need to be corrected in order to improve the accuracy and quality of the State's data. One significant issue is in regard to the State not reporting the full foster care population required by AFCARS (the CMH children in the agency's responsibility for care and placement and children returned home for whom the State has responsibility for placement, care or supervision). Another issue is the reporting of missing data to valid AFCARS values. This has significant implications for the interpretation of Delaware's data, especially in the areas of diagnosed disabilities and children that have previously been adopted prior to the current foster care episode.

Tab C contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, State staff are requested to contact the ACF Regional Office with proposed timeframes for implementing the improvement plan. The State and the ACF Regional Office (in conjunction with the Children's Bureau) will discuss the completion dates outlined by the State and negotiate the final due dates. The State should provide written quarterly updates to the Regional Office. Additionally, the State workplan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The State should contact the ACF Regional Office once it has completed the changes to the system. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review. No further on-site reviews will be conducted unless ACF receives information regarding the quality of the State's data and it is determined that an on-site visit is necessary.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's National Resource Center for Information Technology in Child Welfare (NRC-ITCW). The Resource Center can be contacted at (877) NRC-ITCW (672-4892), or at its web page: <http://nrcitcw.org>. To request on-site technical assistance from the NRC-ITCW, contact your ACF Regional Office.