

**Georgia  
AFCARS  
Assessment Review  
Report**

**December, 2011**

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



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## BACKGROUND

Federal law and regulations 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 penalties<sup>1</sup>. 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 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

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<sup>1</sup> 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 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"> <li>• The data are underreported due to inconsistent data entry.</li> <li>• The data are not being entered.</li> <li>• Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens.</li> <li>• There are no supervisory controls for ensuring data entry, or accurate data entry.</li> <li>• There is incorrect data entry due to training or design issues.</li> <li>• There are missing or incomplete data due to conversion errors.</li> </ul>
2	<p>The technical requirements for AFCARS reporting are not fully met. For example:</p> <ul style="list-style-type: none"> <li>• The State information system has the capability to collect the data, but the program logic is incorrect.</li> <li>• The State uses defaults for blank information.</li> <li>• Information is coming from the wrong module or field in the system.</li> <li>• Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens.</li> <li>• The system needs modification to encompass more conditions, e.g., disability information.</li> <li>• The extraction code for the AFCARS report selects and reports incorrect data.</li> </ul>
1	<p>An AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> <li>• The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens).</li> <li>• There is no program logic to extract the information.</li> <li>• There is 100% missing data according to the frequency report or DCU/DQU reports.</li> </ul>
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 AFCARS data used for the review were from the report period October 1, 2010 through March 31, 2011 (2011A). As part of the post-site visit analysis, the State's documents, 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 charts below summarize the rating factors for the General Requirements and the Data Elements. Tab A contains the detailed findings for the general requirements, the data elements, and the case file review. If as a result of the post-site visit analysis of the State's information the rating factor changed from the preliminary on-site rating, the original is marked out and the new rating is included.

The State's SACWIS, Georgia SHINES (not an acronym) was implemented in June, 2009. Georgia transferred their system from Texas and made modifications to the system to adapt it to meet Georgia's business needs. Overall, SHINES appears user-friendly and robust in the type of information that it has the capacity to collect. The charts below summarize the rating factors for the General Requirements and the Data Elements.

### General Requirements (22)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (11)
4	6	3	10
3	0	0	0
2	2	0	1
1	0	0	0

### Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	14 (21%)	19 (51%)	33 (32%)
3	6 (9%)	9 (24%)	15 (15%)
2	46 (70%)	9 (24%)	55 (53%)
1	0	0	0

As noted in the General Requirements chart the State is incorrectly identifying the population that must be included in the foster care and adoption files. One of the technical corrections required for the foster care reporting population is due to the State incorrectly including the records of children whose only placement is a hospital setting or a locked facility while the child is in the agency's responsibility for placement and care. These children are not part of the AFCARS reporting population. There are additional modifications that need to be made to the foster care elements related to removal episodes (specifically the number of removals and the date of discharge from a prior removal episode). The changes to the foster care elements are to ensure that the number of removals never includes those episodes in which the only placement was a locked facility or a hospital.

Another correction to the reporting of the foster care population is the manner in which the extraction code handles cases of children who have a removal episode lasting less than 24 hours. The extraction code excludes records where the start and end date of a removal episode are the same day. This approach is only partially correct; it does not exclude all removal episodes that last 24 hours or less. Additionally, should the child re-enter foster care for a longer period of time, the extraction code would incorrectly report that the child had 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 find a method to exclude all removal episodes that are 24 hours or less. One example would be to add a time field to both the removal status and legal status, or to the placement date fields. The program code would use these fields to determine whether the child's removal was for less than 24 hours and exclude these records.

The data element chart indicates there are 46 (70%) foster care elements with a rating of "2." Of these 46 elements, 15 data elements relate to the circumstances associated with a child's removal from home. If none of the reasons are selected, the program code is incorrectly setting all of these elements to "does not apply" instead of leaving the fields blank. This is masking the underlying issue that a removal reason was not entered into the information system. Once the technical corrections are made to the extraction code, the State will then have to monitor and ensure that caseworkers are checking all applicable reasons for the child entering foster care.

Also, there is one screen correction that relates to the health/mental health module of the system. The State is correctly using this module to populate the AFCARS data elements related to whether a child has been diagnosed with a disability (foster care data elements #10 - 15). The issue is that there are no start and end dates associated with each diagnosed condition. While this does not affect the accuracy of the data for a regular report period if the diagnosis was made at that time, the data may be incorrect in a resubmitted file. New data entry of diagnosed conditions will overwrite any prior information in the file. The AFCARS file is to reflect the child's circumstances for the report period being transmitted. This is a substantial modification to the screen and database structures. The State will need to add date fields to each diagnosis and extract the data based on the start and end date of a diagnosis in relation to the report period being transmitted. Additionally, it was noted that some diagnosed conditions are entered into text fields that are never part of the database table used to populate elements #11 - 15. Since these are not included, it may be resulting in an underreporting of this information in AFCARS. Lastly, there are some diagnosed conditions that are being incorrectly mapped to an AFCARS category and there are some conditions that may not be reported that should be included. The accuracy of this information also affects what is reported in adoption elements #11-15 if the child's primary basis for special needs is "medical conditions or mental, physical or emotional disabilities."

There are a few issues with the accurate reporting of certain temporary placements. The start date of a runaway or a "trial home visit" must be reported for the current placement date if that is the setting as of the end of the report period. Also, the program code does not include detention or non-acute care hospitalizations in the number of placements. These must be included in the total number of placements for a child.

The State is also incorrectly including certain legal actions and reviews that do not meet the requirements in section 422(b)(8)(ii) and 475(5)(B) of the Social Security Act for the date of the most recent periodic review (foster care element #5). The program code must be modified to not check the Team Meeting screen.

## **Conclusion**

In general, the State is in conformance with most of the AFCARS standards. The agency involved a comprehensive group of staff from the field offices as well as the central office in the AFCARS review. The staff were very engaged during the review and made use of the time to ask questions and improve their understanding of AFCARS. This same group from the regions also serve as the liaisons to the line staff and provide training and guidance on how to use the system, meaning of the data, etc.

While there are some significant modifications that need to be made as noted in the above discussion, many of the technical changes are relatively minor. Once the technical corrections are completed, these elements, along with the others previously identified, will need to have the quality of the data improve. The State will need to develop and implement a method to ensure accurate and timely entry of data into SHINES.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan (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 and related corrected screens, extraction code, etc. 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 AIP. The State may obtain technical assistance from the Children's Bureau's Network of Training and Technical Assistance Resource Centers.