Idaho
AFCARS
Assessment Review
Report

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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

Executive Summary

From May 1 – 5, 2006, staff of the Children's Bureau, Administration for Children and Families (ACF) Region X, and the Office of Information Services (OIS) conducted an assessment review of Idaho's Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the Family Oriented Community User System (FOCUS). The AFCARS data used for the review was from the report period April 1 - September 30, 2006 (2005B).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): 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 and 26 of the 27 AFCARS general requirements is assessed 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 and general requirement. A scale of zero (State's SACWIS does not collect one or both of the AFCARS files) to four (fully meets AFCARS standards) is used to assign a factor to each element. A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings" matrices for the general requirements, the foster care and adoption data elements (Tab A). The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

General Requirements

Rating Factor	Foster Care Population (8)	Adoption Population (3)	Technical Requirements (16)
4	7	3	16
3	1	0	0
2	0	0	0
1	0	0	0

Data Elements

Rating Factor	Foster Care (66)	Adoption (37)	Total
4	15 (23%)	15 (41%)	30 (29%)
3	10 (15%)	11 (30%)	21 (20%)
2	41 (62%)	11 (30%)	52 (51%)
1	0	0	0

There are a significant number of technical corrections that need to be made to the program code. However, in certain instances, one change will affect many elements (e.g., circumstances associated with removal, 15 elements, and race, six elements). There are several technical changes that affect both the screen design and the extraction code. These changes will require more time and resources but should lead to better data collection.

One area that needs to be completed is the interface with the title IV-A system. Data on whether title IV-A is a source of income to the child is required for AFCARS reporting and the State is unable to do this currently due to the lack of an interface. The AFCARS data is required regardless of the status of the implementation of an interface. The State either needs to complete the interface as soon as possible, or develop an alternative approach to report the required AFCARS data.

Other areas in which FOCUS is incomplete is in the collection of: whether the child was previously adopted, regardless of location or type of agency; and, the primary basis for special needs. The State currently only reports whether a child was previously adopted if the adoption occurred from the Idaho child welfare system. The State is going to have to add fields to the system in order to record whether the child had been previously adopted and what age the child was at the time of the adoption. In regard to determination of the primary basis for special needs, the program code, not the case worker, selects the primary reason by selecting the first reason that was entered. The State must modify the system in order to allow case workers to select the greatest barrier to a child's adoption.

One set of data elements that are being underreported and misreported are those related to whether the child has been seen by a licensed professional and found to have health/mental health conditions. For AFCARS reporting purposes, the information reported for these elements reflect chronic and/or significant diagnosed conditions that the child may have. We do not use the more narrow definition of a disability as it may change over time. According to the frequency report for the State's 2006A data, which reflects technical changes made to the program code, 29% of the children in foster care have a diagnosed condition that is reportable to AFCARS (such as attention deficit disorder, reactive attachment disorder, etc.). This was not a significant change from the percentage reported by the State for the 2005B report period. There are both mapping and data entry issues related to these elements. Once the program code is modified, the State needs to ensure that case workers enter this data and keep it up-to-date. This is an area the State needs to address prior to its next Child and Family Services Review.

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data in a timely manner, increase supervisory oversight, and assess the validity of the data prior to submitting it to the Administration for Children and Families (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 issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Another area related to data quality is the accuracy of data converted from other systems or paper files to FOCUS. While no discernable pattern found was found during the analysis of the case file review, the errors found were related to older cases not having the correct dates of first removal. Even though the error rate was not substantially high, the State must focus on reviewing all open cases for which the current removal episode started prior to the State's

conversion to FOCUS. The accuracy of the data is important for accurate assessment of how well services are meeting the needs of children and their families.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS 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, the State staff must submit the Improvement Plan electronically to the ACF Regional Office, OIS, and the Children's Bureau with estimated dues dates for completing the tasks in the Improvement Plan. 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 Regional Office and the Children's Bureau.

The State should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the State with another set of test cases. These scenarios test the technical changes made to 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.

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 resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

TABLE OF CONTENTS

Background 1

Rating Factors 2

Findings 3
Data Elements 4

Conclusion 6

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

Data for the adoption and foster care analysis and reporting system (AFCARS) is required by Federal law and regulation. 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[1]. Additionally, States that received funding to develop, implement, and operate a statewide automated child welfare information system (SACWIS) under Federal regulations 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. 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 (AAR) 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 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 regulation, 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 ACF. 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 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 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 is also compared against a small, randomly

[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).

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 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 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 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. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

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	There are data quality issues. For example: • 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. • Incorrect data entry due to training or design issues. • Missing or incomplete data due to conversion errors.
2	The technical requirements for AFCARS reporting are not fully met. For example: • 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	An AFCARS requirement(s) has not been implemented in the information system. For example: • 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.

For data elements and general requirements that do not meet existing AFCARS standards (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 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.

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 B 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 A provides detailed information on the findings for the general AFCARS

requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period April 1, 2005 - September 30, 2005 (2005B).

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

Data Elements

There are several elements in which the quality of the data needs to improve. Overall, 52% of the data elements received a rating factor of two; 41 (62%) foster care elements and 11 (30%) adoption elements require system and program code modifications. This may involve a screen design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface. Additionally, 21% of the data elements received a rating factor of three; 10 (15%) foster care and 11 (30%) adoption elements require additional training and supervisory oversight for the timeliness and accuracy of data entry.

There were several elements that were identified as needing technical corrections and the State made some of these corrections after the on-site visit and submitted revised documentation to ACF. Based on these changes, some elements went from a rating factor of "2" to "3." The State will still 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/or supervisory oversight to ensure the timeliness of data entry.

- Financial Data Elements (Foster Care Elements #61 and #62)

The interfaces between the child welfare information system, FOCUS and the title IV-A information system is not complete. Consequently, data required for AFCARS foster care data element #61, title IV-A [TANF], as a source of income for the child are incomplete.

- Child Disability Information (Foster Care Elements #10 - 15)

For AFCARS reporting purposes, the information reported for these elements reflect chronic and/or significant diagnosed conditions that the child may have. A resource list of conditions to be mapped to AFCARS is listed on the Children's Bureau's web page at http://www.acf.hhs.gov/programs/cb/systems/afcars/resources.htm. Idaho's AFCARS data indicates an underreporting of this data. One of the corrections made to the program code is that if there is an exam date entered and no health conditions have been entered, the data reported to AFCARS will be "no." This means that a child has been seen by a medical professional and was found to have no diagnosed disabilities, or those that would be mapped to AFCARS. This is an improvement from previous reported data, for which a significant percentage of children had been reported as not having been to a medical professional. There are several issues with how

these data are to be recorded in the system. Even with the revised method of extracting the data for foster care element #10, has the child been diagnosed with a disability, the "no" responses may be a "false" no; meaning that the worker entered the exam date but may not have entered the diagnosed conditions once the evaluation report was received from the doctor. It would be a better approach to have the question with the three AFCARS values as options on the health screen. There needs to be additional oversight to ensure that case workers do enter the diagnosed conditions into -the system. The State needs to look at longer term solutions to ensure that if a child is diagnosed with any health, mental, behavioral health, or educational condition, it is entered into the information system.

- Circumstances associated with removal (foster care elements #26 – 40)

Another area that appears to be significantly underreported is the circumstances associated with removal. The case file review findings indicate there were generally more conditions present that contributed to the child's removal than what is being recorded in the system. The State needs to provide additional training and oversight to ensure all conditions, alleged or substantiated, that were present are entered into FOCUS. This is also another area where the design of the screen and the fields used to record the information may be contributing to incomplete data. Currently, case workers are required to go to two separate fields to enter the information and there is not an internal edit check to the screen to require the worker to go to the second field. A better approach might be to combine all of the reasons associated with a child's removal onto one selection screen and indicate that the worker is to check all that apply.

- Child previously adopted (foster care element #16)

Another area that has under or misreported data is the question "has the child been previously adopted?" The State's system does not have the capacity to record previous adoptions of a child that occurred prior to the current removal episode that occurred in another state, another country, or from a private agency. The data that is reported to AFCARS only reflects those children in the Idaho foster care system that had been previously adopted from the State's child welfare system. The system and program code need to be corrected in order to accurately collect this data. The State must implement fields to record this data as soon as possible.

- Dates of removal (foster care elements #18 and #21)

For AFCARS reporting purposes, if a child's first living arrangement while under the agency's responsibility for care and placement is a locked facility or a hospital, then the child's removal episode does not begin until (or if) the child is placed in a foster care setting such as a foster home or group home or other institutional setting. The State currently includes these situations in its AFCARS file. The State will need to modify the program code, and possible data entry fields, to be able to record this AFCARS removal date.

- Case Plan Goal

There are several revisions needed to the collection of case plan goal information. There are several old "goal types" that are on the selection list that are no longer used by the State. These

need to be removed from the selection list or disabled so case workers cannot select them by accident. There are other goals, such as relative guardianship, that are incorrectly mapped to AFCARS that need to be corrected.

- Discharge dates (foster care element #56)

The State staff indicated there is not a specified period of time defined by policy or statute for the length of time a child can be returned to his/her home while still under the agency's responsibility for care and placement. Staff indicated judges often will specify that the child be returned home under the agency's responsibility for placement and care and the case will be reviewed at the next periodic review hearing. However, occasionally the child will be returned home for a non-specified period of time. In these instances, if the child has been in his/her home for six months the State is to report the child as discharged at the six-month point. This discharge date is for AFCARS reporting purposes only. The State may need to modify the fields used to collect this information and will have to modify the program code.

- Primary basis for special needs

AFCARS requirements ask for the "primary" reason a child was determined to be special needs. This is often the situation that was the greatest barrier to the child's adoption. The State's approach to reporting this data is inaccurate. The system does not have a means for the case worker to specify which of all the special needs is the "primary" one. Instead, the program code will extract to the AFCARS the first one found that was entered. Based on the frequency report and the case file review, this was often age, even if there were severe disabilities or several siblings. The State needs to implement its planned revisions to this as soon as possible.

CONCLUSION

There are a significant number of technical corrections that need to be made to the program code. However, in certain instances, one change will affect many elements (e.g., circumstances associated with removal and race). There are several technical changes that affect both the screen design and the extraction code. These changes will require more time and resources but should lead to better data collection.

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data in a timely manner, increase supervisory oversight, and assess the validity of the data prior to submitting it to the Administration for Children and Families (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 issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Another area related to data quality is the accuracy of data converted from other systems or paper files to FOCUS. While no discernable pattern was found during the analysis of the case

file review, the errors found were related to older cases not having the correct dates of first removal. Even though the error rate was not substantially high, the State must focus on reviewing all open cases that the current removal episode started prior to the State's conversion to FOCUS. The accuracy of the data is important for accurate assessment of how well services are meeting the needs of children and their families.

Tab B 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 finding(s), the task(s), the date the task is estimated to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office, the Children's Bureau and OIS with estimated dues dates for completing the tasks in the Improvement Plan. 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 Jennifer Zanella in the ACF Regional Office and Angelina Palmiero in the Children's Bureau.

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 Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). Once the State has completed the AIP, notify the ACF Regional Office. 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 as changes to the system and training are addressed, and after all system changes and training are completed. 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.

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 resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.