

**Illinois
AFCARS
Assessment Review
Report**

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**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 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 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) 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

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. For additional information on specific issues for the general requirements and the data elements, please see the attached matrices in Tab A. Tab B contains the AFCARS Improvement Plans (AIP).

The AFCARS data used for the review were from the report period October 1, 2009 - March 31, 2010 (2010A). 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	4	2	10
3	1	1	0
2	3	0	1
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	6 (9%)	6 (16%)	12 (12%)
3	8 (12%)	4 (11%)	12 (12%)
2	37 (56%)	19 (51%)	56 (54%)
1	15 (23%)	8 (22%)	23 (22%)

Overview of Illinois data collection

The collection and recording of information on child welfare cases in Illinois is accomplished through a combination of filling out forms and data entry into two information systems. The two information systems are the Child and Youth Centered Information System (CYCIS) and the State Automated Child Welfare Information System (SACWIS). (The State uses the same name and acronym as the Federally defined information system but the State's system was not designed in accordance with the requirements in 45 CFR 1355.52-57.) The CYCIS is an older system that has been in existence for many years and is used by all counties in Illinois. Field staff in most counties also use the SACWIS system.

Documentation provided by the State for the AFCARS Review related only to CYCIS. The State staff identified CYCIS as the system that is considered the case file and the AFCARS data are extracted from CYCIS. While onsite, the State provided the Federal team with a copy of "Administrative Procedure #5 Child Welfare Case Record Organization and Uniform Recording Requirements." This document refers primarily to use of forms and what must be entered into CYCIS. These documents were reviewed during the post-site evaluation of the State's AFCARS data collection. Notes and findings are incorporated into the enclosed matrices.

Some of the information that is entered into CYCIS is first entered into SACWIS, (e.g. demographics). The worker then generates a pre-filled form from SACWIS and submits it to clerical staff for data entry into CYCIS. After clerical staff enters new or updated data into CYCIS, a new form, referred to as a “turnaround” form, is generated that reflects this new information. For the small number of counties that do not use SACWIS, the same forms that are generated from SACWIS are filled out by hand and submitted to clerical staff for data entry. The enclosed matrices note where the information is recorded.

This multiple layered approach to data collection has resulted in incomplete and inaccurate AFCARS data. The use of two systems requires data to be entered twice; updated information must likewise be entered in two locations. There was a lack of understanding by the participants of the case file review that there were two operational systems. This is likely contributing to the lack of updates in the data.

AFCARS General Requirements and Data Elements

The State’s AFCARS foster care reporting population is based on the child’s living arrangement setting while in the agency’s responsibility for placement and care. The State is incorrectly excluding several living arrangement types from the selection of the reporting population. This includes children who runaway at the time the agency received responsibility for placement and care. The enclosed matrices include all the living arrangement types that must be included in the initial selection.

The Illinois Department of Children and Family Services (DCFS) is the title IV-B/IV-E agency and the Department of Juvenile Justice (DJJ) is currently a separate agency. The staff indicated the agencies may merge. The State and Federal team discussed implications for AFCARS reporting if the designated title IV-B/IV-E agency includes Juvenile Justice. The merger will affect the State’s foster care reporting population by requiring the inclusion of juvenile justice youth that are in the Department’s responsibility for placement and care and who are placed in a setting that is within the scope of title IV-E. The Children’s Bureau encourages the State to maintain close communication with its Federal partners to ensure that accurate considerations are given to AFCARS reporting and funding issues.

The State is correctly including all records of children adopted from the State’s child welfare foster care system. However, the State is not including the records of children who are adopted through a private agency from another State and on whose behalf Illinois is paying a title IV-E subsidy, or if such cases are included they are incorrectly reported as public agency adoptions (see discussion below regarding data elements). The State must include all adoptions in which the agency has involvement due to an adoption agreement for subsidy or services. These must be entered into the systems and correctly reported in AFCARS.

As noted in the chart above, there are 23 (22%) data elements rated as a “1.” This means the State is not collecting this data and the information systems do not have a database field to record the information. Below is a list of the foster care and adoption elements that the State does not collect.

Foster Care

- #16 – 17, Has the Child Ever Been Adopted, and at What Age (regardless of where the adoption occurred and what agency was involved in the adoption)
- #29, Parent Alcohol Abuse
- #30, Parent Drug Abuse
- #31, Child Alcohol Abuse
- #32, Child Drug Abuse
- #35, Death of Parent
- #36, Incarceration of Parent
- #37, Caretaker Inability to Cope Due to Illness or Other Reasons
- #38, Abandonment
- #39, Relinquishment
- #40, Inadequate Housing
- #53 and #55, Foster Caretaker's Hispanic or Latino Origin
- #61, Title IV-A

Adoption

- #10, Primary Basis for Determining Special Needs
- #18, Mother Married at Time of Birth
- #29 – 32, Relationship of Adoptive Parent to Child
- #33, Child Was Placed from
- #34 Child Was Placed by

Based on the material provided for the AAR none of the above elements are collected on a form or in either of the two information systems. For the majority of these elements, the State has hard-coded a response in AFCARS. This type of a default must be removed from the extraction code. For example, adoption elements #33 and #34 are hard-coded to indicate the child was placed for adoption from within the State of Illinois and placed by the public agency. This means that adoption cases that are initiated by a private agency (in-State or another State or country) and for which DCFS has entered into an adoption agreement for services or subsidy are incorrectly reported as being the State's adoptions from its foster care system. In other instances, the State has attempted to derive the data from other systems and the information derived does not relate to the purpose of the AFCARS data element. For example, the extraction code checks the deprivation factors for a child to determine several of the elements that are conditions associated with reasons a child was removed from his/her home and placed in foster care. These conditions should be related to the caseworker's decision for placing the child, not whether eligibility factors apply for the child.

The State needs to modify the systems and add fields that will correctly capture this information. Also, the extraction code must be modified to map all of the above elements to blank since the data do not exist in the system. Please note the State's semi-annual data submission will fail the missing data standard as long as the State is not collecting the data. If the State develops an interim solution to the accurate collection of these data, the strategy should be described and outlined in the State's AFCARS Improvement Plan Matrices.

AFCARS data are to be reflective of the information regarding a child for the report period being submitted. The Illinois information systems need to be modified to add history tables for many of the AFCARS data elements to ensure that resubmitted data reflect the time period of the report. One example of data elements that need a history table are the diagnosed conditions of a child (foster care elements #10 -15). If in the first report period there is no diagnosed condition but a condition is diagnosed within the next report period, when the State re-submits data for the first report period it will incorrectly show the child as having a diagnosed condition. The State's E-Health system may be a good way to accurately collect this data for AFCARS, and the extraction code will have to check the start and end dates of a diagnosis in relation to the report period that is transmitted to the Children's Bureau.

There are several other changes that require modifications to the fields on the screens for collecting information. One example is the need to add the AFCARS value of "unable to determine" for certain elements so that the data are accurately reported on children who have entered foster care through a Safe Haven. The Federal team recommends that the State add the option "abandoned" or "Safe Haven" in place of "unable to determine" so that the State has more complete data on a child's circumstance and to make it easier for caseworkers to know the meaning of the selection options.

Data Quality Monitoring

Currently there is a need for additional oversight at the State level regarding data quality and completeness in AFCARS reporting. We encourage State technical and program staff to work together to develop a plan to regularly identify data quality issues and communicate these issues to the field. The attached matrices contain information on specific data elements that would benefit from this type of attention, such as elements with a high percentage of "unable to determine" responses. We also encourage field staff to review the information in CYCIS for completeness at a predetermined point in the case. Many States require that field staff review case-level AFCARS data for completeness and accuracy at the time of the child's periodic review. Finally, supervisory oversight has been identified as a critical component of improved data quality. Supervisors should be encouraged to review the "turnaround" forms for their field staff to ensure the accuracy of what has been entered into the system.

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, taking into consideration those used for the State's current Child and Family Services Review Program Improvement Plan.

Conclusion

Several data quality issues may stem from the State's use of multiple information systems. In addition to the two described in this report, there are other systems from which the State extracts data (e.g., the financial system). Since extensive changes must be made at a minimum to CYCIS, the State may want to take this opportunity to reconsider its information technology solutions to an electronic case file. The State should consider consolidating its data collection into one single statewide system that is used by all counties.

The State's current AFCARS reporting is incomplete and inaccurately reflects the situation of a child in foster care. Many of the contextual data elements pertaining to the cause of children entering foster care are missing and the defaulting of this data to "does not apply" masks underlying issues beyond the lack of data collection. As noted above, the State must immediately begin to report the data elements noted above as blanks. Defaulting missing data to a valid AFCARS value is not permissible and is non-compliant with the AFCARS regulation.

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 Resource Centers.