

**Indiana
AFCARS
Assessment Review
Report**

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and
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U.S. Department of Health and Human Services**

Executive Summary

Staff of the Administration for Children and Families (ACF), Children’s Bureau, Central and Regional Offices, and the ACF Office of Information Services (OIS) conducted an assessment review of Indiana’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the State’s Indiana Child Welfare Information System (ICWIS). The AFCARS data used for the review was from the report period April 1, 2007 through September 30, 2007 (2007B).

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 for overall data quality, to determine whether the State is meeting the AFCARS definitions for the information required, and to assess whether the correct data are being entered and extracted. Each of the 103 foster care and adoption data elements and 24 of the 26 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. Rating factors are assigned to each General Requirements item and each of the data elements. The rating factors are: 4 - Compliant, 3 - Data Quality Issues, 2 - Technical Issues, and 1 - No Capacity to Collect the Information (for more detailed explanations of the rating factors see the Rating Factors section of the Report).

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 and 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 (24)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (13)
4	4	1	11
3	1	2	1
2	3	0	1
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	16 (24%)	10 (27%)	26 (25%)
3	23 (35%)	9 (24%)	32 (31%)
2	27 (41%)	18 (49%)	45 (44%)
1	0	0	0

As noted in the above table, the State is in compliance with most of the General Requirements. The significant area requiring a technical correction (rating factor of “2”) is in the methodology used by the State to transmit data for previous report period. The data submitted for some

elements will reflect the current circumstances of child and not those circumstances that were known at the time of the prior report period for which data are being submitted.

Additionally, in regard to the foster care population, the State is incorrectly excluding from the reporting population those children whose only living arrangement during a removal episode is “runaway.” The State is also incorrectly including children whose removal episode was 24 hours or less. The State staff indicated that the changes being implemented as part of the redesign of ICWIS should address these issues.

Of the data element findings, the most significant change to the system (rating factor of “2”) is in collection of diagnosed disabilities. The State collects this information in a section other than the one used to collect other medical information, such as the child’s doctor visits, medications, etc. The State needs to consolidate the collection of this information into one area and add start and end dates to each diagnosed condition the child is given. Duplicative data entry is also a concern that needs to be addressed in order for the Children’s Bureau to find the State’s SACWIS as being compliant.

A significant finding for the adoption elements relates to the manner in which the State is extracting information regarding whether or not a child has been determined by the agency to be special needs. It is possible that this information is being underreported in AFCARS. The extraction process used does not correctly identify all children with a special need.

Once changes are made to the system and the extraction code, underlying data quality issues may surface. These elements and those that received a rating factor of “3” will require additional training and supervisory oversight for the timeliness and accuracy of data entry.

Additionally, while changes made to the program code will lead to more accurate AFCARS data, other problems in the data may emerge. The State’s semi-annual data submission may 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 Children’s Bureau. 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 the Children’s Bureau. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency’s responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and 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 a column for comments.

Within 30 calendar days after the receipt of this report and the attached AIP, the State staff must submit the AIP electronically to the Regional Office, OIS, and 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 Regional Office and 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. The State may obtain technical assistance from the Children's Bureau's Network of Training and Technical Assistance Centers.

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BACKGROUND

Data for the Adoption and Foster Care Analysis and Reporting System (AFCARS) are 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 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 (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 regulations, policy issuances, and the AFCARS Technical Bulletins. The AAR evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Children's Bureau. A second focus of the AAR is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

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

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

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).

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 timeliness of data entry of certain data elements, and 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, but 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. Below is a chart that lists the factors that were used for the analysis of the State’s AFCARS.

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	There are data quality issues. For example: <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	The technical requirements for AFCARS reporting are not fully met. For example: <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

	<p>system.</p> <ul style="list-style-type: none"> 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	<p>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.</p>

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 caseworker 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 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.

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 significant findings resulting from the review of the State’s AFCARS data collection. The AFCARS data used for the review were from the report period April 1, 2007 through September 30, 2007 (2007B).

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. Tab A contains the findings matrices for the general requirements, the data elements, and the case file review.

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 comments.

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, Regional and Central Office, and OIS 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 is to provide electronic quarterly updates of its progress to the Children's Bureau. The AIP will be used as the working document for recording all notes and completion/approval of each task. 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 in 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. The State may obtain technical assistance from the Children's Bureau's Network of Training and Technical Assistance Centers.

General Requirements

In general, the State is correctly reporting the required foster care and adoption population, as well as meeting the technical requirements for file submission. There are a couple areas where the State needs to make corrections in either the selection logic used to identify which records are to be reported, or in specific data elements.

Foster Care Population

There are three areas where corrections are necessary for the accurate reporting of the foster care population. In all three situations the State is including records that are not part of the AFCARS reporting population.

States are required to report only those children in the State title IV-B/IV-E agency's responsibility for placement and care that are below the State's age of majority unless the State is paying title IV-E foster care maintenance payments for youth who are expected to complete their secondary education by age 19. Indiana's age of majority is 18 and the State does not claim title

IV-E funds for eligible 18 year olds. The State is incorrectly including in its AFCARS report youth over the age of 18. The State will need to develop a method to report these youth as discharged as of their 18th birthday. The outcome is to be reported as “emancipation.”

Also, a removal episode of less than 24 hours is never to be included in the reporting population. A removal episode is defined as the time in which the child enters foster care until the agency no longer has responsibility for placement and care of the child. The State is including in its AFCARS report records for children in care for less than 24 hours. The State will need to modify its extraction code to exclude these records from the reporting population.

Lastly, for AFCARS reporting purposes, removal episodes of a child under the agency’s responsibility for placement and care that include only a living arrangement that is a facility outside the scope of foster care (i.e., detention or a hospital), are never included in the AFCARS report. The State is incorrectly including these records in its AFCARS submission.

Technical Standards

In regard to the technical standards, the State is not correctly extracting the files for the purposes of a subsequent² submission. One of the technical requirements for reporting the foster care and adoption files is that the data must be extracted from the data system as of the last day of the reporting period (45 CFR 1355.40(b)(1)). This means that data that is entered after the last day of the data collection cycle is not to be included in the regular³ file. For the purposes of files that are resubmitted (i.e. a subsequent file), the data extracted are to reflect the circumstances of the case for the report period being submitted. For instance, if a State is re-submitting the data for the period April 1, 2006 – September 30, 2006 (2006B) on July 2, 2007, the data is to reflect the events of the case for the 2006B report period. This means that if the child had a periodic review that occurred on May 5, 2006, that is the date to be reported for foster care element #5, date of recent periodic review. If the child’s case plan goal was reunification during the 2006B timeframe, but as of July 2, 2007 the goal is adoption, the case plan for 2006B must be reported as reunification. The State’s current extraction process would be reporting newer information for many of the data elements. This has implications for the data used in the Child and Family Services Review Data Profile, the Child Welfare Outcomes Report, and other analysis done by the Children’s Bureau.

Data Elements

There are 45 (44%) of the foster care and adoption data elements that received a rating factor of “2.” Twenty-seven (41%) were for the foster care data elements and 18 (49%) were adoption data elements. This section highlights those areas that require the more significant changes to the information system and/or the extraction routine.

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

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

Defaults and Incorrect Mapping

Some of the corrections needed for both the foster care and adoption data elements involve modifications to the extraction code by removing a default setting or remapping of State values to AFCARS values. A default setting is when the data were not entered into ICWIS but the extraction code inserts a valid AFCARS value, such as “unable to determine.” The use of defaults provides the Children’s Bureau with inaccurate data and often masks underlying data quality and data entry issues. If a field that is to be reported to AFCARS is missing information, then the AFCARS field is to be reported as blank. The State will need to implement quality assurance measures to ensure the data are entered accurately and in a timely manner. If 10 percent or more of the records for an element are reported as missing, the element will fail the missing data standard and the element will be marked as out of compliance when the State submits its six-month data report. Many of the changes should be relatively simple and could be made rather quickly.

Child’s Diagnosed Conditions

One area that requires substantial modifications to the system is in the area of child disability information (foster care elements #10 - 15). For AFCARS reporting purposes, the information reported for these elements reflects chronic and/or significant diagnosed conditions that the child may have. The State’s system does not clearly separate diagnosed conditions from characteristics of the child that may be identified by the worker, the parent, or foster parent and may be used for the purpose of identifying a suitable placement for the child. The system does not contain the question “has this child been diagnosed with a disability?” The AFCARS responses to this question have specific definitions. These are:

“Yes” indicates that a qualified professional has clinically diagnosed the child as having at least one of the disabilities listed below.

“No” indicates that a qualified professional has conducted a clinical assessment of the child and has determined that the child has no disabilities.

“Not Yet Determined” indicates that a clinical assessment of the child by a qualified professional has not been conducted.

The extraction code checks the “special needs detail” screen and if a diagnosed condition is selected, it sets the AFCARS foster care element #10 (has child been diagnosed with a disability?) to a “yes.” If no conditions are found, this element is set to “no.” This is providing a false “no” response to this element. The frequency for “yes” responses in the 2007B report is 1,761 (11%). The case file review findings indicate that of the 59 cases reviewed, 23 (40%) were found to have errors. In all of these cases the AFCARS data indicated “no,” but the reviewer found a diagnosed condition that is reportable in AFCARS. If no information is entered into ICWIS, then this element should be set to blank. Workers need to identify whether the child has or has not been seen by a physician and has any diagnosed conditions. Supervisors should also be checking that this information is being entered and updated, especially when a child is being placed in a therapeutic foster care setting.

Another significant issue with the State methodology for collecting this data is that there are no dates associated with the child's diagnosed condition. Consequently, a complete history is not maintained to reflect the time frame the child may have each condition. This is especially important for files that the State resubmits.

Another area most likely contributing to the under reporting of this information is where it is collected in the system. In addition to the Special Needs Detail screen, the State has a "Medical Passport" section in its system. It is fairly comprehensive and includes fields that also collect the information that is collected on the Special Needs Detail screen. This results in duplicative data entry. The State needs to make modifications to consolidate all this information into one section of the system and make the corrections as noted above. Additionally, this correction will address the issue of data duplication raised by the Children's Bureau for SACWIS compliance. 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>.

Removal Episodes

For AFCARS reporting purposes, when a child's only living arrangement during a removal episode is a placement outside the scope of foster care (i.e., detention or a hospital), this child is not to be considered for the AFCARS reporting population and the removal episode is never included when reporting AFCARS. This affects foster care elements: #18, date of first removal from home; #19, total number of removals from home; #20, date of discharge from the previous foster care episode; and, #21, date of current removal episode. While the State is meeting this requirement currently, as changes are made to the system as part of redesigning the screens, the State needs to ensure that the workers continue to enter this information in the correct fields and that the extraction code does not consider this situation as a removal episode.

Additionally, for AFCARS reporting purposes, if the child's first living arrangement was one that is outside the scope of foster care and then the child moves to a foster care setting, the removal episode start date is the start date of the foster care living arrangement. This date would always be considered the start date of the the removal episode. The program code incorrectly extracts the date the child entered the hospital or locked facility as the removal date. The State will need to modify the extraction code to extract the date the child is placed in a foster care setting.

Another situation that the State is not reporting correctly is the start date of removal episodes for children/youth that are either on runaway status when the agency received responsibility for placement and/or runs away prior to the first placement. If the child is still on runaway status as of the end of the AFCARS report period, the child should be included in the AFCARS population with a placement status of "runaway" (foster care element #41). Because runaway is considered a temporary absence from an on-going placement, children whose only placement setting is runaway during the removal episode would be reported as having zero placement settings in the current episode (foster care element #24). The date the runaway status began will be reported for the date of the current placement setting (foster care element #23). This date is also the start date of the removal episode (foster care element #21).

Lastly, due to the design of the State's system to collect placement end reasons and discharge from foster care reasons (outcomes), there are issues of the State reporting a child discharged when actually the child is still in foster care. There also is an issue that the child may have been discharged from foster care but the worker selected a placement end reason and an outcome is not reported to AFCARS. As part of the State's redesign of the system, the State should reconsider how it collects foster care placements versus discharges from foster care in order to improve the accuracy of the AFCARS data.

Determination of a child's special needs and the basis of the special need

The State is extracting this information incorrectly. Based on the method used, the State is not correctly identifying in the extraction code all children with a special need. It appears that the only records reported as being a special needs case are those children where there is a diagnosed condition and not those children for whom a special need due to age, membership in a sibling group, race or ethnicity, or other State-defined special needs. In addition to this not meeting the AFCARS reporting requirement, this could have an impact on the number of children counted for the Adoption Incentive Awards.

Relationship of Adoptive Parent(s) to Child (Adoption Element #29 – 32)

AFCARS allows for the selection of more than one relationship type between the adoptive parents and the child. The options are: "stepparent," "other relative," "foster parent," or "other non-relative." The State's system only allows the worker to select one relationship. The selection options and the program code must be modified to allow the worker to select, and to report, more than one relationship.

Data Quality

There are several areas in which timely and accurate data entry are an issue. This was identified mostly through the case file review. There are 32 (31%) of the foster care and adoption data elements that received a rating factor of "3." Twenty-three (35%) were for the foster care data elements and 9 (24%) were adoption data elements.

One area that serves as contextual information for why children are entering foster care and what preventive services may be needed is in the area of "circumstances associated with a child's removal from home." This area appears to have significant underreporting. 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 the circumstances associated with the child's removal are entered into ICWIS.

In regard to collecting race information, there is a need to ensure that workers are asking individuals this information directly, including all races with which they identify, so that workers are not selecting a race based on their own observations. The Federal team also provided the State with suggestions of other options to add to the screen for workers to select. For instance, if the caseworker asks the individual to identify all races, but the person does not want to give

the worker that information, then the worker could select the option “declined.” In this way, it is clear to the worker what option should be selected and the State can track the frequency of this response.

In general, the State needs to incorporate the review of the AFCARS data as part of its ongoing quality assurance processes. Supervisors should also be instructed to review the data with the caseworker and check for accuracy and timely data entry. One time that this may be convenient is when the case is being reviewed as part of the six-month periodic review. The overall accuracy of the AFCARS data is crucial for the Children’s Bureau’s use of it in the Child and Family Services Review, the Child Welfare Outcomes Report to Congress, as well as many other purposes.