

**Missouri
AFCARS
Assessment Review
Report**

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BACKGROUND

Federal law and regulation 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'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

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 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 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	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 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: <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. The AFCARS data used for the review were from the report period April 1, 2008 - September 30, 2008 (2008B). The charts below summarize the rating factors for the General Requirements and the Data Elements.

General Requirements (24)

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

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	9 (14%)	7 (19%)	16 (16%)
3	30 (45%)	15 (41%)	44 (43%)
2	27 (41%)	15 (41%)	42 (41%)
1	0	0	0

During the post site-visit phase the State made several modifications to the extraction code based on the preliminary findings of the onsite review. These revisions were submitted to the Children’s Bureau in time to be incorporated into the final findings. In many instances these corrections resulted in a change of the rating factor that was given during the onsite review. The findings matrix in Tab A reports the previous rating with a “strike-through” and the new rating. The AFCARS Improvement Plan (AIP) in Tab B contains the final rating factor. The State will 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 supervisory oversight to ensure timeliness of data entry, including the work conducted by the private child placing agencies. As noted above, there still are 42 of the 103 data elements that need a technical correction. There are several of these that are generally the same element in both the foster care file and the adoption file, for example the diagnosed conditions of a child and the date of termination of parental rights.

General Requirements

Reporting Populations

The State’s AFCARS foster care reporting population “must include all children in foster care for whom the State title IV-B/IV-E agency has responsibility for placement, care, or

supervision².” Two of the Divisions within the Missouri Department of Social Services are the Children’s Division (CD) and the Division of Youth Services (DYS). The designated IV-B agency is the CD and the designated IV-E agency is the Department. The State is currently not including the DYS youth that are in the Department’s responsibility for placement and care that are in foster care settings.

If the Department/Children’s Division has responsibility for placement and care of a child/youth, but the only living arrangement for the child in the removal episode is a locked facility or a hospital, these removal episodes are never included in the AFCARS report. The State is incorrectly including these records in its AFCARS submission.

The State is incorrectly including in the foster care population youth over the age of 18, or 19 if the child had been eligible for title IV-E funds. The State will need to develop a method to report these youth as discharged as of their 18th birthday, or the day on which the youth is no longer eligible for title IV-E. The outcome is to be reported as “emancipation.”

Removal episodes of less than 24 hours are not to be included in the AFCARS foster care file. The State is including these records in its AFCARS report. The State will need to modify its extraction code to exclude these records from the reporting population. Additionally, all removal episodes that are less than 24 hours are never counted as a removal episode.

The State is not reporting its full adoption population. States are required to report on all:

- children who had been in foster care under the responsibility and care of the State child welfare agency and who were subsequently adopted whether special needs or not and whether subsidies are provided or not;
- special needs children who were adopted in the State, whether or not they were in the public foster care system prior to their adoption and for whom non-recurring expenses were reimbursed; and,
- all children adopted for whom an adoption assistance payment or service is being provided based on arrangements made by or through the State agency³.

The State is only reporting on children that were adopted from the Missouri foster care system. The State does enter into adoption assistance agreements with families who adopt a child from a private child adoption agency. The State needs to begin reporting these cases as soon as possible.

Technical Requirements

The State is not correctly extracting the files for the purposes of a subsequent⁴ 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

² 45 CFR 1355.40(a)(2)

³ Appendix B of 45 CFR 1355

⁴ Submissions that are received after the AFCARS due dates for a regular report (May 15 or November 14) are considered subsequent data files

1355.40(b)(1)). This means that data that are entered after the last day of the data collection cycle are not to be included in the “regular⁵” file. For subsequent files, 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 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 Data Profile, the Report to Congress, and other analysis done by the Children’s Bureau.

Data Elements

This section highlights those areas that require more significant changes to the information system and/or the extraction routine.

- Removal Episodes

There were issues with the information regarding removal episodes. Mostly the errors appear to be related to issues with the selection and extraction logic in the program code (see notes for foster care elements #18 - 21 in the detailed findings matrices). As noted in the findings for the case file review, there were cases where the child’s first placement had been a hospital and so the removal dates were incorrect. There were some errors identified in the case file review that need further investigation by the State to determine the cause. Primarily, the issue of the AFCARS data indicating the child had two removal episodes, but the dates reported for the first ever removal from home and the current removal from home were the same (if the child had two removal episodes the dates should have been different). There are issues related to the State reporting a child’s record with a discharge date and no outcome information, and the child is still in foster care. There also are issues related to there being a date and missing discharge outcome reasons and the child actually was discharged from foster care. These issues may be due to the design of the system and the use of the “Alternate Care Closing Function.” The State should consider alternatives to the way this information is recorded and make modifications to the system.

- Placement Information

A primary issue with the dates reported for the current living arrangement is that the information is based on the start and end dates of a payment and not the start and end date of the child’s placement. Since the State received SACWIS funding to build a comprehensive case management system, the system should not be operating based on payment rules. The section where the caseworkers enter the start and end date of a placement should reflect the actual dates and reflect the physical location where the child is residing at all times while in the agency’s

⁵ 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.

responsibility for placement and care. The State is not counting all placement moves that are to be included in AFCARS, in some instances these settings are not being entered into the system. The State needs to ensure that all placement moves made by the private child placing agencies are also recorded in the State's SACWIS.

- Diagnosed Disability

Missouri's AFCARS data indicate an underreporting of the diagnosed disabilities information. The frequency report for the period under review indicates that 3,934 (33%) of the records had a response of "yes." In conducting the case file review, reviewers found that 21 of the 65 (32%) records analyzed had disability information not reported to AFCARS. In 11 of the cases the AFCARS file indicated "unable to determine," but the reviewer found diagnosed conditions that should have been included in AFCARS for the period under review. In eight additional records there should have been a response of "yes" instead of "no." The definition for each of these values is:

"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.

There are several factors that could be contributing to the underreporting of this information. One issue is the section of the system in which this information is recorded needs modifications. The AFCARS question "Has the child been clinically diagnosed as having a disability?" (foster care element #10) is not on the screen under the "Evaluated Disability Conditions" section. Instead, the screen lists only the five AFCARS conditions: "mental retardation," "visually/hearing impaired," "physically disabled," "emotionally disturbed," and "other medically diagnosed condition requiring special care." The State extracts the response to foster care element #10 by deriving the response of "yes" or "no" based on if the worker indicated that condition exists and gives the condition a severity rating, if the condition is not present, or if the worker selects "not yet evaluated."

Additionally, since the system lists only the five AFCARS conditions, the start and end dates of each specific diagnosed condition for a child are not being recorded. Consequently, when the State submits a subsequent data file, incorrect information for that report period is being submitted.

The above approach also contributes to inaccurate data. Based on the case file review, it appears caseworkers are selecting the wrong category for some diagnosed conditions, or are not selecting a category because they are unsure which of the five is appropriate. Also, there were a couple of cases where the child had a diagnosed condition but it was not one that is to be reported to AFCARS. For AFCARS reporting purposes, the information reported for these elements is to

reflect chronic conditions. A list of conditions to be mapped to AFCARS can be found at www.acf.hhs.gov/programs/cb/systems/afcars/resources. This is not an exhaustive list and if the State has a question regarding whether a condition should be mapped to AFCARS or not, they should contact either the National Resource Center for Child Welfare Data and Technology or the Children's Bureau.

If the State had a "medical profile" section this might be a better location to collect the data for AFCARS purposes. This section could include all diagnosed conditions for the caseworker to select from and include the start and end dates of the condition. These conditions then would be mapped to the appropriate AFCARS category. This would provide more accurate data because the caseworker would not have to guess which category a diagnosis belongs to.

This is an area for ongoing training and supervisory oversight in order to ensure the accurate and timely entry of data. Staff need to be instructed to enter this information based on reports received by licensed professionals conducting the evaluation, and not on whether or not the child/family identifies health conditions.

CONCLUSION

The State has taken great strides since the onsite review to make corrections to the extraction code. Many of the remaining technical corrections are more complex but should yield more accurate data. As previously noted, those elements that have been corrected will need to be reviewed for data accuracy as there may be underlying data entry issues that will now become more apparent. 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 caseworker is reviewing the case and preparing it for 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 the State's use of the data.

The State also needs to ensure that all parties involved in a case take ownership for the accuracy of the data. This includes not only the State staff but the private provider staff that are also associated with each case. The review of timely entry of information by the private provider staff is an area that the State needs to incorporate into its quality assurance process.

There are several areas identified in the AIP that require additional training. One of the findings from the case file review is the inconsistent use of some fields and dates (e.g., hearing dates, filing dates, etc.). The agency needs to ensure that all data fields are used consistently in order to have reliable and comparable data.

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 Centers.