

**North Carolina
AFCARS
Assessment Review
Report**

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TABLE OF CONTENTS

| | |
|-----------------------------|----------|
| Background | 1 |
| Rating Factors | 2 |
| Findings | 3 |
| General Requirements | 5 |
| Data Elements | 5 |
| Conclusion | 7 |

| | |
|---|--|
| 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

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 and Analysis 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. 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 |

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| | <p>data, but the program logic is incorrect.</p> <ul style="list-style-type: none"> • 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 | <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 (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 case worker 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 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.

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.

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 AFCARS data element reporting issues and the general requirements, please see the attached matrices. The AFCARS data used for the review were from the report period October 1, 2007 - March 31, 2008 (2008A).

Tab A contains the findings matrices for the general requirements, the data elements, and the case file review. If as a result of the post site-visit analysis of the State’s information the rating factor changed from the preliminary on-site rating, the original is marked out and the new rating is included.

Below is a chart that summarizes the rating factors for the General Requirements and the Data Elements.

General Requirements (22)

| Rating Factor | Foster Care (8) | Adoption (3) | Technical (11) |
|----------------------|------------------------|---------------------|-----------------------|
| 4 | 6 | 1 | 7 |
| 3 | 1 | 0 | 1 |
| 2 | 1 | 2 | 3 |
| 1 | 0 | 0 | 0 |

Data Elements (103)

| Rating Factor | Foster Care (66) | Adoption (37) | Total (103) |
|----------------------|-------------------------|----------------------|--------------------|
| 4 | 13 (20%) | 14 (38%) | 27 (26%) |
| 3 | 21 (32%) | 1 (3%) | 22 (21%) |
| 2 | 31 (47%) | 22 (59%) | 53 (52%) |
| 1 | 1 (2%) | 0 | 1 (.009%) |

Data Collection

AFCARS data is collected in North Carolina through the use of two forms, Form 5094 for foster care and Form 1808 for adoption. Workers complete these forms and submit them to clerical staff for data entry into the two information systems used to submit AFCARS data (i.e., the Child Placement and Payment Tracking System (CPPTS) for foster care and the Adoption Information Management System (AIMS) for adoption. For foster care, the worker is to submit a form when a child comes into care and then each time new information has been collected or there is a change in the child’s status. After the initial entry, only the fields with new or updated information are completed. The worker submits the form to the supervisor for approval, and then in most counties, the form is forwarded to data entry staff for entry into the system. The worker later receives a printout of what information is in the system on the child for review and correction.

At the time an adoption is to be finalized, the worker completes North Carolina Form 1808 and submits it to the court as a court report. The AFCARS adoption elements are contained on this form and are entered into AIMS after the adoption is finalized. Both information systems and processes are independent of each other.

General Requirements

Technical Requirements

There are two technical requirement items that were found to be non-compliant with AFCARS reporting. One is related to extraction and submission of subsequent² data files. One of the technical requirements for reporting the foster care and adoption files is that the data must be extracted from the data system 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, 2009, 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, 2009 the goal is adoption, the case plan goal 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.

Secondly, there is an issue with the method the State uses to identify and extract the records for the reporting period. States are required to follow the guidance in ACYF-PI-95-09, reissued May 23, 1995 and Technical Bulletin #13, AFCARS File Extraction. Since the State is not using the method listed in these documents, there is a possibility that records will get dropped from one report period to another. This causes a problem for the analysis conducted by the Children's Bureau, specifically regarding an outcome for the child's foster care episode.

Data Elements

This section highlights those areas that require the more significant changes to the forms the State uses to collect the information, the information system used to collect and transmit the AFCARS data, and/or the extraction routine used to compile the AFCARS file.

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 either of the information systems but the extraction code inserts a valid AFCARS value, such as "unable to determine." The use of defaults provides the Children's Bureau and the State with inaccurate data and often masks underlying data quality and data entry issues. If a field that is to be

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.

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.

Record Number

The State does not have a Statewide record number for each child that is used for AFCARS reporting. North Carolina is a county administered State. A county case number and a Services Information System (SIS) client identification (ID) number are assigned to each child and each county assigns its own client ID numbers. The SIS ID is used for the AFCARS record number, but this number does not remain the child's ID statewide and a child's foster care history is not associated with the record number. Each county maintains a history based on the activities (removals) that occurred in that county. Consequently, a child who entered and was discharged from foster care in one county with one ID, who later enters foster care in another county with a different ID will not have the earlier foster care experience available for reporting purposes. This affects historical information on the number of removals, the start date of first removal, and the end date of the foster care episode prior to the current removal episode, if applicable. The absence of statewide IDs has many implications for AFCARS as well as the Child and Family Service Reviews (CFSR). For AFCARS purposes, the same client may be reported multiple times as different clients. North Carolina has a project to develop a process for a statewide ID number assignment system. This project has been on hold for the past couple of years. The State must implement a unique, Statewide record number for each child to be used for AFCARS reporting purposes. This same number should also be used in the new National Youth in Transition Database (NYTD) report.

A related issue to the one above relates to the methodology used by case workers when a case is closed in one county title IV-B/IV-E agency when legal jurisdiction is transferred to another county title IV-B/IV-E agency. This issue was identified during the case file review portion of the onsite review. The AFCARS outcome data indicated the child had been discharged (foster care element #56) and the discharge reason was "transfer to another agency" (foster care element #58). Upon further examination the reviewer found that the child was still in foster care and in the same foster care living arrangement. However, the responsibility for care and placement transferred from the original county title IV-B/E agency to the new county title IV-B/E agency. This approach results an incomplete removal history and inaccuracies in the number of placements as well as removals. It also appears that two different children are being reported in AFCARS. The State needs to address its method of transferring cases and instruct workers that the above situation is to be recorded as a change in placement and not a discharge from foster care. For the purposes of AFCARS reporting, the court jurisdiction changes but the State's responsibility for care and placement does not change. The record is to reflect a continuous removal episode. The implementation of a single, unique record number should also help to ensure that a complete history of a child's foster care experience is transmitted to the Children's Bureau.

Race and Hispanic/Latino Ethnicity

The State uses 64 codes to collect race and ethnicity information. Each code represents a race and ethnicity combination. For example, code 26 indicates that the individual is "Black/Native Hawaiian or Other Pacific Islander and Hispanic or Latino." The worker enters this value on the form, and clerical staff enter this number into the data collection system. State staff are aware this method of collecting race data is likely causing confusion and error in the reporting of race and ethnicity elements. Workers are likely to select a combination that is only partially correct, or may try to select a code from memory. An incorrect digit in the code can lead to reporting a race combination that does not reflect the race and ethnicity of the client.

The State should make modifications to the collection of race data in order to ensure its accuracy. The State should assign a value to each of the five race categories and instruct case workers to enter all applicable race codes. The form, the manual, and the CPPS will have to be modified to allow for the entry of this information. The extraction code will also need to be modified to extract all race categories.

Child's Diagnosed Conditions

For AFCARS reporting purposes, the information reported for these elements reflects 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>.

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

CONCLUSION

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 case worker and check for accuracy and timely data entry. One time that this may be convenient is when the case worker 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 many other purposes.

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 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 case worker 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.