

**Nebraska
AFCARS
Assessment Review
Report**

September, 2010

**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'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	<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

The State's SACWIS, Nebraska Family On-line Client User System (N-FOCUS) was implemented in 1998. It is used by almost all of the six divisions within Nebraska Department of Health and Human Services: Behavioral Health, Children and Family Services, Developmental Disabilities, Medicaid and Long-Term Care, Public Health, and Veterans' Homes. The Division of Children and Family Services includes protection and safety programs and services (child welfare, juvenile services), economic and family support programs and services.

The charts below summarize the rating factors for the General Requirements and the Data Elements.

General Requirements (23)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (12)
4	6	2	11
3	1	0	1
2	1	1	0
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	14 (21%)	13 (35%)	27 (26%)
3	24 (36%)	6 (16%)	30 (29%)
2	28 (42%)	18 (48%)	46 (45%)
1	0	0	0

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. The findings matrix in Tab A includes the onsite rating factor. If as a result of the post-site visit analysis the rating changed, the previous rating has been struck-out and the final rating listed below it. 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. The State should carefully review all the findings in each document as there have been some changes from the onsite findings.

General Requirements

Foster Care Reporting Population

In general, the State is correctly reporting the AFCARS foster care reporting. One correction the State needs to make is to include records of a child that is on runaway status at the time the Department obtains responsibility for placement and care.

Currently the State is correctly reporting children to AFCARS up to the State's age of majority (19 years old). The Fostering Connections to Success and Increasing Adoptions Act of 2008 (Public Law 110-351) amended title IV-E by allowing States the option to define the age of a "child" up to the age of 21. States are required to submit amended title IV-E plans by December 31, 2010 that includes the State's definition of a child. If Nebraska's Department of Health and Human Services chooses to exercise the option to extend title IV-E beyond the age of 18 when it submits the amended title IV-E plan, or at any time in the future, then youth meeting the revised definition of a child must be included in the AFCARS foster care reporting population.

Adoption Reporting Population

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 that are adopted through a private agency from another State and on whose behalf Nebraska is paying a title IV-E subsidy. The State must include all adoptions in which the agency has involvement due to an adoption agreement for subsidy or services.

Technical Requirements

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 are entered after the last day of the data collection cycle are not to be included in the "regular"³ 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, 2009 – September 30, 2009 (2009B) on July 2, 2010 the data is to reflect the events of the case for the 2009B report period. This means that if the child had a periodic review that occurred on May 5, 2009 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 2009B timeframe, but as of July 2, 2010 the goal is adoption, the case plan for 2009B 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 Review Data Profile, the Child Welfare Outcomes Report to Congress, and other analysis done by the Children's Bureau.

Data Elements

There were several elements, as noted in the above chart, which require some type of technical correction. Many of these require modifications to the extraction code to set the AFCARS element to blank if the data are missing in the child's electronic case file. These "default" settings are masking underlying data entry issues that the State will need to address.

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.

There are other changes that require modifications to the fields on the screen 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.

The process for entering information regarding a child’s diagnosed condition(s) (foster care elements #10 - 15) appears complicated and is yielding false “no” responses. The State needs to develop a method, either in the system or with the extraction routine, to more accurately determine if a child has been diagnosed with a condition or not, and whether the child has been seen by a health care professional. N-FOCUS does not contain the question “has this child been diagnosed with a condition.” Instead, there are two drop-down boxes. One is a categorical list with the options: physical disability, emotional/mental illness, mental retardation/developmental. Based on the category selected, the second box contains conditions for that category. The worker highlights a diagnosed condition and a pop-up screen appears with the options “Mark Yes,” “Mark No,” or “Not Yet Determined” and the worker is to select the appropriate choice. If one option (i.e., anxiety disorder) is checked as “yes,” then all other options within a given characteristic type group defaults to “undetermined.” Additionally, dates are not captured for when a diagnosis starts and ends. These dates need to be added to the screens and the selection logic will need to use the dates when reporting a child’s medical condition for each report period.

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. One factor that will be taken into consideration is the report periods used for the State’s current Child and Family Services Review Program Improvement Plan.

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.