

**New Hampshire AFCARS
Assessment Review
Report**

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And
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

Executive Summary

From August 9 - 13, 2004 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region I, and the Office of Information Services (OIS) conducted an assessment review of New Hampshire’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS data used for the review was from the report period October 1, 2003 through March 31, 2004 (2004A).

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 on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated 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. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings” Matrices for the foster care and adoption data elements, and the general requirements (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 final rating factors may differ from those given as the preliminary on-site ratings. Changes in the rating factors reflect findings from analysis of the case file review findings and the further analysis of the State’s program code and system screens made during post-site visit analysis. The final rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	4
Technical Standards	2

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	14 (21%)	17 (46%)	31 (30%)
3	25 (38%)	3 (8%)	28 (27%)
2	27 (41%)	17 (46%)	44 (43%)
1	0	0	0

Outlined below is an overview of the results of the AFCARS Assessment Review based on the on-site and post-site visit analyses.

General Requirements – Reporting population and technical requirements

The State is in full compliance with the foster care and adoption population requirements. In regard to the technical requirements, the State's program code does not extract the AFCARS foster care file based on a transaction date associated with either the date of the current removal from home or a discharge from foster care. This results in fluctuations in the number of children being reported in AFCARS each report period.

Significant Data Element Findings

There are some issues related to the date of first-ever removal from home, the total number of removals from home, the date of discharge from a prior removal episode, and the date of latest removal. The case file review findings indicate errors in the number of removals from home. The reviewers found that in most instances the child had only one removal instead of two or more as reported to AFCARS. Also, based on the analysis of the case file findings there appears to be a problem with how the program code determines the number of previous removals and the date of discharge from a prior removal episode. There were instances where the number of removals reported in AFCARS was two or more, and the date of discharge from a prior removal episode was missing. The State needs to do some further analysis of the problem and provide its analysis to the Children's Bureau.

It is important that the elements pertaining to the removal history be accurate as the Children's Bureau uses these elements in many reports and for purposes of measuring the length of time in care and calculating re-entry rates. The State is required to report the full history of a child's experience in New Hampshire with out-of-home removals, specifically the date of first-ever removal, the total number of removals, and the date of discharge from the prior removal episode.

The State's information system, BRIDGES (not an acronym), contains the question "has this child been diagnosed with disabilities" on its data entry screens. However, the program code does not use it to populate the AFCARS question. Instead, it derives the information based on whether or not a disability was indicated by the worker. This is resulting in an underreporting of the information and a misrepresentation of the State's foster care population. This method makes it difficult to ascertain if the worker failed to enter the data or, alternatively, if the child had been seen by a physician and did not have any disabilities. Missing data are being mapped to "not yet determined," which means the child has not been seen by a medical professional.

There were several errors in the areas of placement types, counts, and information on the foster parents. The errors include not counting certain placements that are to be included, such as the placement in a juvenile justice facility of a child still in the agency's care and placement responsibility, and over-counting other placement moves. The AFCARS data does not reflect all of the number of moves of children placed with contracted child placement agencies. The actual current living arrangement also may not be accurately reported. It appears that the contracted placement agencies are not providing the information to the local child welfare agency and it is not being entered into BRIDGES. The State needs to ensure that this information is reported from the child placing agency to the local child welfare agency and is entered timely into BRIDGES.

There are several living arrangements that are not being accurately reported to AFCARS. “Pre-adoptive” placement settings may be under-represented in the AFCARS data. The State needs to ensure that it extracts this information for children living with the individuals that intend to adopt them prior to the finalization of the adoption. Another problem area relates to children placed with a non-licensed relative that later becomes licensed. At that time the child is no longer being reported as living in a “family foster home, relative.” The State needs to accurately reflect the relationship of the child to his or her’s relative foster care providers. Lastly, there are no values in the extraction program code to pick up independent living arrangements.

Related to the issue of relative placements is that of missing data on the foster family structure, including the race and Hispanic/Latino origin of the relative foster parents. The State needs to ensure that this information is being entered and is correctly extracted.

There were also issues related to the inaccurate reporting of the current case plan goal, primarily with regard to the State reporting “co-guardianships” as “guardianships.” “Co-guardianship” involves children that are still in the agency’s care and placement responsibility, but the court orders co-guardianship with the foster parent. The agency must reflect the actual situation of these children and indicate the plan as “long-term foster care.”

The State needs to continuously assess the quality of the data. Several items were given the rating of “3” because of underreporting of information and will necessitate additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider reviewing the data in the file at the time of a periodic review to ensure it is accurate and up-to-date. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. However, the State’s semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data, and assess its validity prior to submitting it to ACF. 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 ACF.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan to the ACF Regional Office with estimated due dates for completing the tasks within it. Test cases will be provided to the State once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children’s Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS Improvement Plan.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review 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 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. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

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 is 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.

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 to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

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% 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, data cannot be assessed to determine whether the State submitted the correct foster care population required by the 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 one (does not meet the AFCARS standards) 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.

RATING FACTOR	DEFINITION
1	<p>The 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 data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on 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.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 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 case worker 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 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.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a "2" will be assigned. If it appears the problem is due to data entry, then a "3" will be assigned to the requirement.

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 major findings resulting from the review of the State's AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review was from the report period October 1, 2003 through March 31, 2004 (2004A).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, and team member notes. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

General Requirements

Population Standards

The State is in full compliance with both the foster care and adoption population requirements.

Technical Requirements

The State does not use the transaction dates associated with the date of removal and the date of discharge to extract the data file. This results in fluctuations in the number of children being reported in AFCARS each report period. The State staff need to correct this error as soon as possible. ACF will monitor the submission of data for two to three report periods to check for any fluctuations in the data.

Data Elements

- Information on Children Diagnosed with Disabilities (foster care elements #10 - 15; adoption elements #11 - 15, if the primary basis for special needs is a medical/emotional condition)

One of the strengths noted by the Federal team is the State's use of foster care health nurses in every district. However, the State staff did indicate the disability information is underreported for the foster care file. In the foster care file, AFCARS contains the question "Has the child been

clinically diagnosed as having a disability(ies)?" The responses in AFCARS have specific definitions:

"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.

For the report period under review, the number of responses for "yes" were 525 (36%), zero for "no," and 923 (64%) for "not yet determined."

The State's information system does contain a field to indicate if the child has been diagnosed with a disability. However, the program code used to extract the data does not use this field. Instead, the program code derives the responses of "yes" and "no" only based on whether there are any disability categories selected by the worker. So, if a disability is checked, the response to the question is "yes." Otherwise, the response is coded as "no," possibly creating a false "no" in the reported data. A blank in any of the fields could mean the child has not been seen by a physician, that the worker has not received the doctor's report, or the child had been seen by a doctor and has no medical needs. The program code must be corrected to extract information from the question field, the value "not yet determined" must be added to the screen, and staff needs to be trained to enter this data correctly and timely.

Additionally, there were errors found in the mapping of the disability categories. The Federal and State teams have reviewed the State's information and changes have been made to the mapping. The program code needs to be modified to reflect the new mapping.

- Total number of removals from home and the date of discharge from a prior removal episode (foster care elements #19 and 20)

In the case file review, the reviewers noted that the child had only one removal instead of two or more as reported to AFCARS. It is important that these elements be accurate as the Children's Bureau uses these elements in many reports and for purposes of measuring the length of time in care and calculating re-entry rates.

There appears to be a problem with how the program code determines the number of previous removals and the date of discharge from a prior removal episode. There were instances when the number of removals reported in AFCARS was two or more, and the date of discharge from a prior removal episode was missing. The State needs to do some further analysis of the problem and provide its analysis to the Children's Bureau.

- Manner of Removal (foster care element #25)

The State implemented a policy allowing “voluntary placement agreements” sometime in 2002. However, this value was never added as a selection option on the screen and is not included in the program code. The State must make this correction immediately and implement training on its proper use.

- Placement Information (foster care elements #24 and #41, and #49 - 55).

There were several errors found in the program code. These include not counting certain placements that are to be included, such as the placement in a juvenile justice facility of a child still in the agency’s care and placement responsibility; and over counting other placement moves. The placement count should not include a return to the same placement setting from a “runaway,” “trial home visit,” or “acute stay hospitalization.”

One significant issue found during the case file review was that all placement settings and moves of children placed with contracted child placement agencies were not being entered into BRIDGES. The State needs to ensure that this information is reported from the child placing agency to the local child welfare agency and is entered timely into BRIDGES.

The State is not mapping “group homes” based on the size of the facility. Some of these facilities may house 12 children or more. Any facility with more than 12 children must be mapped to “institution.”

There are several living arrangements that are not being accurately reported to AFCARS. One is for children that are to be adopted by the people with whom they are living with. These are not being reported as “pre-adoptive homes.” It is important for the State to accurately capture this information as it provides additional information on the number of children potentially reaching the goal of permanency through adoption. Another problem area relates to children placed with a non-licensed relative who later becomes licensed. At that time, the child is no longer being reported as living in a “family foster home, relative.” The State needs to accurately reflect the relationship of the child to his or her’s relative foster care providers. Lastly, there are no values in the extraction program code to pick up independent living arrangements.

Related to the issue of relative placements is the issue of missing data on the foster family structure, including the race and Hispanic/Latino origin of the relative foster parents. This State needs to ensure that this information is being entered and is correctly extracted.

- Case plan goal (foster care element #43)

The court sometimes gives “co-guardianship” of a child in long-term foster care to the agency and the foster parents. The State is mapping these situations to case plan goal “guardianship.” The State must reflect the actual situation of these children and indicate the plan as “long-term foster care.”

One issue identified in the case file review was that workers may not be updating the case plan goal in a timely manner. As noted in the enclosed findings, there were a significant number of

records (seven of thirteen) reported to AFCARS as not having a goal established. Many of these children had been in care for a year. There were other instances where the goal was reported as “reunification” but the reviewer found the goal to be “long-term foster care” and “adoption.” This is an important element in regard to the Child and Family Services Data Profile and needs to be addressed accordingly.

- Reasons for exit from foster care (foster care element #58)

There were situations that reflect placement exit/change reasons and not exit from the agency’s care and placement responsibility that were mapped to AFCARS values of discharge. The State needs to correct the extraction of this information and ensure that workers are correctly entering information as either a placement change or a discharge. The errors found in this element also are affecting the dates extracted for the date of discharge from the current removal episode (foster care element #56) and the date of discharge from the previous foster care episode (foster care element #20).

- Has the agency determined special needs and the primary basis for special needs (adoption element #9 and 10)

There was a significant discrepancy in the frequency report between the response of “yes” for this element and the response of “yes” for adoption element #35, which deals with whether an adoption subsidy exists. The numbers for element #35 were much higher than those in elements nine and ten. There is a default mapping missing data to “no.” The default needs to be removed and the State needs to ensure that workers enter the information regarding the primary basis for special needs.

- Sources of financial support (foster care elements #61, 62, 64 and 65)

The State needs to ensure that it is correctly reporting whether title IV-A (TANF) (element #61) is a source of income for a child. If emergency assistance funds are being used for a child’s placement, then this information must be reported in element #65.

Also, currently the State’s interface with the New England Child Support Enforcement System (NECSSES) is only a one-way transfer of information, from child welfare to child support. BRIDGES has the capability to collect whether child support was a source of income to the child (element #62). This information must be entered manually by the fiscal staff. However, there is no program code written to extract the information from BRIDGES. This same problem also applies to the reporting of Social Security Income (SSI) (element #64). The State needs to correct this as soon as possible.

In regard to whether there are other sources of income for the child, BRIDGES collects information on other Federal, State, and private sources of income but the program code does not check for these. The program code must be modified to include the check for these types of benefits in addition to the ones listed in AFCARS.

- Mother married at time of child’s birth (adoption element #18)

The State is collecting this information on the screens related to a child's adoption. While this information is reported in the AFCARS adoption file, it is information that is generally assessed and gathered when a child enters foster care and part of the child's psycho-social history. The State needs to add this field to one of its "general client" screens. Also, the program code is not currently extracting this information from the field where it is entered, but instead checks the date of the mother's marital status and compares it to the child's birth.

- Relationship of child to adoptive parents (adoption elements #29 – 32)

In the adoption file, the State must report the relationship of the child to the adoptive parent(s). AFCARS allows for the reporting of more than one relationship. The State collects this data, but it may be underreported in regard to multiple relationships. The system allows the worker to select only one relationship (step-parent, foster parent, other relative or other non-relative) of the adoptive parent to the child. For instance, if the adoptive parent was a relative and had been a foster parent, only one of the relationships is reported in AFCARS. This is resulting in an under-representation of the number of relatives and foster parents that are adopting children in New Hampshire.

CONCLUSION

The State has a variety of "technical" corrections to make to the program code and the screens that collect the data. Once changes are made to the program code and/or to the data entry screens, the quality of the data will need to be monitored for accuracy. It may be necessary to implement additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

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 task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. The State and the ACF Regional Office (in conjunction with the Children's Bureau) will discuss the completion dates outlined by the State and negotiate the final due dates. The State should provide written quarterly updates of its progress to the Regional Office. 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 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 State should contact the ACF Regional Office once it has completed the changes to the system. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the

data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF 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 resource centers. To request onsite technical assistance from the resource centers, contact your ACF Regional Office.