Nevada
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 March 6 – 10, 2006, staff of the Children's Bureau, Administration for Children and Families (ACF) Region IX, and the Office of Information Services (OIS) conducted an assessment review of Nevada's Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the Unified Nevada Information Technology for Youth System (UNITY). The AFCARS data used for the review was from the report period April 1 - September 30, 2006 (2005B).

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 and 26 of the 27 AFCARS general requirements is assessed on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element and general requirement. A scale of zero (State's SACWIS does not collect one or both of the AFCARS files) to four (fully meets AFCARS standards) is used to assign a factor to each element. 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 rating factors received by the State are:

General Requirements

Rating Factor	Foster Care Population (8)	Adoption Population (3)	Technical Requirements (16)
4	5	2	13
3	2	0	2
2	1	1	1
1	0	0	0

Data Elements

Rating Factor	Foster Care (66)	Adoption (37)	Total
4	12 (18%)	7 (19%)	19 (19%)
3	36 (55%)	21 (57%)	57 (55%)
2	16 (24%)	9 (24%)	25 (24%)
1	2 (5%)	0	2 (2%)

There are two significant areas that the State needs to place on a high priority status 1) the completion of the interfaces with the titles IV-A and IV-D information systems; and 2) the inclusion of the entire population under the responsibility of the designated single State titles IV-B and IV-E agency. The interfaces between the child welfare information system, UNITY, and the titles IV-A and IV-D information systems are not complete. These interfaces are required in

order for the State to be found in compliance with its Statewide Automated Child Welfare Information System (SACWIS) requirements and to accurately report data need for the AFCARS foster care data elements #61, title IV-A (TANF), and title IV-D (child support) as sources of income for the child.

Due to the State's organizational structure, the Department of Health and Human Services (DHHS) is the designated single State title IV-B/IV-E agency; all children placed in the Department's responsibility for care and placement and placed in out-of-home care are to be included in the AFCARS foster care reporting population. This includes children receiving services under the child welfare, juvenile justice, or child mental health programs. If the child's first and only out-of-home placement setting is a hospital or locked facility, then the child is not included in the AFCARS reporting population. If the child goes from a hospital or a locked facility to a community-based placement setting, then the child must be included in the AFCARS report. Currently, the State does not include in its AFCARS report, nor provide the protections (section 422(b)(10) of the Act), all children under the agency's responsibility for care and placement who are in an out-of-home placement setting. Specifically, the State is not including children receiving juvenile justice or mental health services while in DCFS placement and care responsibility. The State does include youth in the juvenile justice program that are placed in out-of-home care for whom the State claims title IV-E foster care funds.

As noted in the above chart, the State's main finding is the need for improved data quality. This involves entering the data in the system in a timely manner, receiving placement information from child placing agencies under contract to the State/county, and increased supervisory oversight. The State has some technical corrections that must be addressed in order to accurately report the data. Once the technical corrections are made to the system, it will comply with the requirements to record and report AFCARS data. The State will need to continuously address data quality.

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data and assess its validity prior to submitting it to the Administration for Children and Families (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. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

One set of data elements that are being under reported and misreported are those related to whether the child has been seen by a licensed professional and found to have health/mental health conditions. For AFCARS reporting purposes, the information reported for these elements reflect chronic and/or significant diagnosed conditions that the child may have. We do not use the more narrow definition of a disability as it may change over time. According to the frequency report for the period under review, 84% of the children in foster care have not been to a doctor. Based on the case file review findings the majority of the cases were reported as "not yet determined" in AFCARS, but the reviewers found the child had been to a doctor and a

diagnosed condition was found. This is an area the State needs to address prior to its next Child and Family Services Review.

There were issues identified that relate to court processes that the State staff noted it will bring to the committees working in these areas. There is an issue in the time frame that a case is closed (the removal episode ends) due to a finalized adoption and when the court dismisses the agency from care and placement responsibility. There can be a lag of up to six months from the date of the court hearing finalizing the adoption and the date the workers enter as a discharge. The discharge date is not always reflecting the date of the court hearing but instead the date of the follow-up hearing dismissing custody. This is especially a problem for adoptions for children placed out-of-State.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS 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 are to submit the Improvement Plan electronically to the ACF Regional Office, OIS, and the Children's Bureau with estimated dues dates for completing the tasks in the Improvement Plan.

The State should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the State with another set of test cases. These scenarios test the technical changes made to 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 technical assistance from the resource centers, contact your ACF Regional Office.

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BACKGROUND

Data for the adoption and foster care analysis and reporting system (AFCARS) is required by Federal law and regulation. The data are to be collected on children in foster care and those who have been adopted under the auspices of the State child welfare agency. States that fail to meet any of the standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial compliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E State plan, and are subject to penalties[1]. Additionally, States that received funding to develop, implement, and operate a statewide automated child welfare information system (SACWIS) under Federal regulations 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. At a minimum, the system must provide for effective management, tracking, and reporting by providing automated procedures and processes to, among other things, meet the adoption and foster care reporting requirements through the collection, maintenance, integrity checking, and electronic transmission of the data elements specified by the AFCARS requirements.

The Children's Bureau is committed to assisting States to develop statewide child welfare information systems and to collect quality data. To this end, SACWIS and AFCARS Assessment Reviews (AAR) were developed to assure that the systems support the management of the programs under titles IV-B and IV-E and can produce accurate and reliable foster care and adoption data. AFCARS Assessment Reviews are conducted in every State, regardless of whether a State operates a SACWIS. The State's information system is assessed against the AFCARS requirements in the Federal regulation, 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 ACF. 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 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

[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).

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 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.

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: • 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. • Incorrect data entry due to training or design issues. • Missing or incomplete data due to conversion errors.
2	The technical requirements for AFCARS reporting are not fully met. For example: • 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: • 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.

For data elements and general requirements that do not meet existing AFCARS standards (factors 0 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and 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.

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 were from the report period April 1, 2005 - September 30, 2005 (2005B).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, team member notes, and the States' corrected program code were assessed to make the final determination of findings. 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 Requirement Standards

A significant finding is that the State is not including its entire foster care population when reporting its AFCARS. Nevada's Department of Health and Human Services (DHHS) contains the Division of Child and Family Services (DCFS), which is the designated single State title IV-B/IV-E agency. DCFS includes child welfare, child mental health, and juvenile justice programs. Consequently, any child that is placed in the agency's responsibility for care and placement and is placed in an out-of-home placement setting is to be included in the AFCARS report. The State is currently only including children that are placed in an out-of-home placement setting while in the agency's responsibility for care and placement that are served under the child welfare program; children receiving juvenile justice or mental health services while in DCFS placement and care responsibility are incorrectly not included in the AFCARS report. The State does include youth in the juvenile justice program that are placed in out-of-home care for whom the State claims title IV-E foster care funds. Also, the State does not provide the protections (section 422(b)(10) of the Act) for all children under the agency's responsibility for care and placement who are in an out-of-home placement setting.

The State must provide all children under its responsibility for care and placement that are in an out-of-home placement setting the protections of section 422(b)(10). The State must include all of these youth in its AFCARS reporting population.

The State staff noted to the Federal team that the information system needs to be modified in order to enter information pertaining to special needs children adopted through a private agency. The system was not initially designed to collect information on these adoptions and must be modified.

Data Elements

The State staff indicated they have been focusing on data clean-up and, in particular, those cases that are open in the system but, are actually closed. There were a significant number of records in this category in Clark County. Since this area makes up a large portion of the State's foster care cases, having accurate and actual open cases in the data report will greatly improve the quality of the States data. The State staff need to ensure that cases continue to be closed in a timely manner.

There are several elements in which the quality of the data needs to improve. Overall, 55% of the data elements received a rating factor of three; 36 (55%) foster care elements and 21 (57%) adoption elements require additional training and supervisory oversight for the timeliness and accuracy of data entry. Additionally, there are 25% of the data elements that required a system modification; 17 (26%) foster care and 9 (24%) adoption elements. This may involve a screen design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface.

There were several elements that were identified as needing technical corrections and the State made these corrections shortly after the on-site visit and submitted revised documentation to ACF. These data elements have been given a rating factor of "3." The State will now 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/or supervisory oversight to ensure timeliness of data entry.

- Financial Data Elements (Foster Care Elements #61 and #62)

The interfaces between the child welfare information system, UNITY, and the titles IV-A and IV-D information systems are not complete. Consequently, information required for AFCARS foster care data elements #61, title IV-A [TANF], and title IV-D (child support) as sources of income for the child are not reported.

There are fields in UNITY where the data could be manually entered, however, it does not appear as if it is used appropriately. Since these fields were designed to be populated by the interfaces, the State must complete the interfaces immediately. This also is a requirement for the State to be in compliance with the requirements for a Statewide Automated Child Welfare Information System (SACWIS).

- Child Disability Information (Foster Care Elements #10 - 15)

For AFCARS reporting purposes, the information reported for these elements reflect chronic and/or significant diagnosed conditions that the child may have. We do not use the more narrow definition of a disability, as it may change over time. A resource list of conditions to be mapped to AFCARS is listed at http://www.acf.hhs.gov/programs/cb/systems/afcars/resources.htm. Nevada's AFCARS data indicates an underreporting of this data. According to the frequency report for the period under review, 84% of the children in foster care have not been to a doctor. Based on the case file review findings, the majority of the cases were reported as "not yet determined" in AFCARS, but the reviewers found the child had been to a doctor and a diagnosed condition was found. There are several issues with how these data are to be recorded in the system. One is that there is not a specific question as to whether the child has been seen by a licensed professional and if so, whether there were, or were not, any diagnosed conditions. The system does have fields for the worker to enter the date the child was examined and by whom. However, there is nothing requiring the worker to enter information beyond that. One change made by the State staff after the on-site review is to have the extraction code check the exam date field. If a date is found, it will check for diagnosed conditions. Based on the result, element #10 will either be set to "yes" or "no." If no date is found, element #10 will be set to blank. This is a

good start to correcting the problem, but does run the risk of the data reflecting a false "no." The State needs to look at longer term solutions to ensure that if a child is diagnosed with any health, mental, behavioral health, or educational condition, it is entered into the information system.

- Placement Information (Foster Care Elements #23, 24, and 41)

The State currently does not report placement settings as "pre-adopt" homes when a child is placed with the family that intends to adopt them. This needs to be added as an option to the placement settings. Additionally, there is an issue of data being entered in a timely manner. This includes placement information from child placement agencies under contract with the State. The State must ensure that all information regarding a child's placement is provided by the contract agency and gets entered into UNITY in a timely manner. One finding from the case file review indicates that placement counts were underreported.

- Circumstances associated with removal (foster care elements #26 – 40)

One area that appears to be significantly underreported is the circumstances associated with removal. The case file review findings indicate there were generally more conditions present that contributed to the child's removal than what is being recorded in the system. The State needs to provide additional training and oversight to ensure all conditions, alleged or substantiated, that were present are entered into UNITY.

- Child previously adopted (foster care element #16)

Another area that has under/mis-reported data is the question "has the child been previously adopted? In order to ensure that this data is recorded in UNITY, the field is mandatory. One county instructed its intake workers to always complete this field and to answer "no." Consequently, the on-going case worker often does not go back to verify its accuracy. Since this is often not information known to the intake worker, and may not be gathered by an investigative worker, it should not be completed during the intake process. This field should not be mandatory during the intake and investigation phase of a case. It could become a mandatory field later in the case management process, if the child is removed from his/her home, such as during the completion of a family assessment for case planning.

CONCLUSION

Overall, the quality of the data needs to improve. The State has some technical corrections that must be addressed in order to report the data accurately, but oversight to ensure timely and accurate data entry is the larger concern. Once the technical corrections are made to the system, it will comply with the requirements to record and report AFCARS data. However, the State will need to address data quality continuously.

The State's AFCARS data also does not accurately include and reflect the populations served by the agency. These issues must be addressed immediately as the population is the basis for all of AFCARS reporting, uses of the AFCARS data (e.g., the Child and Family Services Reviews), and for funding purposes.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the finding(s), the task(s), the date the task is estimated to be completed, and 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 electronically to the ACF Regional Office with estimated dues dates for completing the tasks in the Improvement Plan. 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 Christine Guthrie in the ACF Regional Office and Angelina Palmiero in the Children's Bureau.

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). Once the State has completed the AIP, notify the ACF Regional Office. 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 as changes to the system and training are addressed, and after all system changes and training are completed. 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 technical assistance from the resource centers, contact your ACF Regional Office.