

**South Carolina
AFCARS
Assessment Review
Report**

May, 2011

**Children's Bureau, Administration on Children, Youth and Families
Administration for Children and Families
U.S. Department of Health and Human Services**

TABLE OF CONTENTS

Background	1
Rating Factors	2
Findings	4
General Requirements	4
Data Elements	5
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 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 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 are due both to system issues and to caseworker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system. Once the corrections are made to the system, the data will be re-analyzed. If problems related to caseworker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State levels, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

AFCARS Rating Factors

RATING FACTOR	DEFINITION
4	All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.
3	There are data quality issues. For example: <ul style="list-style-type: none"> • The data are underreported due to inconsistent data entry. • The data are not being entered. • Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens. • There are no supervisory controls for ensuring data entry, or accurate data entry. • There is incorrect data entry due to training or design issues. • There are missing or incomplete data due to conversion errors.
2	The technical requirements for AFCARS reporting are not fully met. For example: <ul style="list-style-type: none"> • The State information system has the capability to collect the data, but the program logic is incorrect. • The State uses defaults for blank information. • Information is coming from the wrong module or field in the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information. • The extraction code for the AFCARS report selects and reports incorrect data.
1	An AFCARS requirement(s) has not been implemented in the information system. For example: <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the information. • There is 100% missing data according to the frequency report or DCU/DQU reports.
0	States operating an automated information system for which they received SACWIS-level FFP were found to be using an external automated information system, or a database (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS system. In addition, there is no program code for the extraction of data from the SACWIS.

FINDINGS

As part of the post-site visit analysis, the State's documents, 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 State should carefully review all the findings in each document as there have been some changes from the onsite findings. For additional information on specific issues for the general requirements and the data elements, please see the attached matrices. The charts below summarize the rating factors for the General Requirements and the Data Elements. Tab A contains the detailed findings 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.

General Requirements (22)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (11)
4	5	2	9
3	2	0	2
2	1	1	0
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	27 (41%)	12 (33%)	39 (38%)
3	12 (18%)	2 (5%)	14 (14%)
2	27 (41%)	23 (62%)	50 (49%)
1	0	0	0

General Requirements

Information System

The State's SACWIS, Child and Adult Protective Services System (CAPSS) was implemented in 1999. Overall, the State's system appears user-friendly and robust in the type of information that it has the capacity to collect. The State runs management reports on a regular basis to assess the quality of the data in the system and also uses the data in management reports used to evaluate its programs.

Foster Care Reporting Population

In general, the State is correctly reporting the AFCARS foster care population. One issue that needs to be addressed is the manner in which the extraction code handles cases of children that have a removal episode that is less than 24 hours. The extraction code selects records where there is at least one day of foster care service recorded for the reporting period (i.e., the start and end date are the same). This approach does not exclude all removal episodes that last 24 hours

or less. Should the child later enter foster care for a longer period of time, the extraction code would incorrectly report that the child had two removal episodes instead of one. In order to accurately reflect the total number of removals that meet the AFCARS standards, the State needs to find a method to exclude all removal episodes that are 24 hours or less. One example would be to add a time field to both the removal status and legal status, or to the placement date fields. The program code would use these fields to determine whether the child's removal was for less than 24 hours and exclude these records.

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 who are adopted through a private agency from another State and on whose behalf South Carolina is paying non-recurring expenses. The State must include all adoptions in which the agency has involvement due to an adoption agreement for subsidy or services and for non-recurring expenses.

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. There were other changes that require the remapping of certain State values to the correct AFCARS values.

There are other changes that require modifications to the fields on the screen for collecting information. The most significant of these is the collection of a child's health/mental health characteristics in foster care elements #10 - 15. The diagnosed disability information is clearly underreported in the foster care file. In the AFCARS report period October 1, 2009 through March 31, 2010 there were only 419 (6%) records indicating that the child had a diagnosed condition that is covered by one of the AFCARS five categories (mental retardation, visual/hearing impairment, emotionally disturbed, and other medically diagnosed condition requiring special care). There are multiple areas in the system where this data is entered and the screen from which AFCARS information is reported is not used by workers. There are "Medical" and "Mental Health" screens where more comprehensive information is recorded. The State must develop a way to streamline data entry of disability information and prevent the need for duplicate data entry in order to promote improved data quality for these elements.

Another issue identified as a result of the case file review, is the State is incorrectly over-counting certain situations as a placement move. The extraction code must be modified to exclude from the count of placement moves changes in the status of a foster home. (For instance, when a relative foster home is licensed or when a foster family intends to adopt the child and the home is re-categorized as a pre-adoptive home.)

Lastly, there may be a significant under-reporting of payment information in foster care element #66 (amount of the monthly foster care payment (regardless of source)). Some of the missing

data may be due to the payments to private therapeutic facilities not being entered into CAPSS. Prior to July 1, 2010 these payments were not issued through CAPSS and not reported to AFCARS. Also, these facilities send an invoice to the State at different intervals (i.e., quarterly or semi-annually) and the State pays the facilities accordingly. The State will need to make sure that the payment is recorded in CAPSS in a manner that the monthly amount and not a total invoiced amount is reported to AFCARS.

Another issue identified with the reporting of the payment information is if there is one day in the month that is not paid for, then the program code incorrectly skips that month. If each month has a day that is not paid for, then it is possible no payment amount is reported to AFCARS.

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.