

# **New Mexico AFCARS Assessment Report**

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## Executive Summary

On March 25 - 29, 2002 staff of the Children's Bureau, ACF Region VI, and the Office of Information Services (OIS) conducted an assessment review of New Mexico's Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was April 1, 2001 through September 30, 2001.

Two major areas are assessed as part of an AFCARS assessment review: 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 is being entered and extracted, and the quality of the data submitted. Each of the 103 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.

Strengths identified by the Federal review team during the review include:

- ❑ A very dedicated staff and good working relationship between technical and program staff.
- ❑ There were no areas found to be in full non-compliance.
- ❑ A significant percentage (49%) of the foster care and adoption (51%) elements were in full compliance.
- ❑ There were many areas needing improvement that the staff had already identified.
- ❑ There is good use of the information system by caseworkers to record case information.

The State was not in full compliance with the technical general requirements. The area that needs to be addressed pertains to the States conversion process from the legacy system to the Family Automated Client Tracking System (FACTS). Based on the on-site findings and the post site-visit analysis, thirty (49%) of the sixty-six foster care data elements fully met the AFCARS requirements. Twenty-two (33%) of the foster care elements require, at a minimum, system changes, and twelve (18%) elements require training for case workers and monitoring of the data to ensure improvement in the quality and accuracy of the data. In the adoption data set, nineteen (51%) out of thirty-seven elements fully met the AFCARS requirements, fourteen (38%) elements require, at a minimum, system modifications, and four (11%) elements require training for caseworkers and monitoring of the data to ensure improvement in the quality and accuracy of the data. Once the program logic changes are implemented, the State will need to monitor caseworkers' data entry to ensure that the quality of the data improves.

Between the time of the on-site review and the issuance of this report, the State's information systems staff made a few corrections to the program code that maps and extracts the AFCARS data. This report and the AFCARS Improvement Plan reflect those changes. As a result of the modifications made to the system, the elements rating factors for some of the elements were changed.

There were three significant issues identified that warrant attention. These were:

- Incorrect dates of removal from home (first and latest), number of removals, and number of placements for the current removal episode for children in care at the time of conversion from the legacy system to FACTS;
- AFCARS data representing a false “no” for whether a child has been diagnosed with a disability or has been previously adopted; and,
- Lack of information on therapeutic foster care placements and therapeutic foster parents.

In addition, there are a number of changes that will need to be made to the system (many are minor) and training will need to be provided to the caseworkers.

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 (See 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).

Within 30 days after the receipt of this report and the attached AFCARS improvement plan, State staff are requested to contact the ACF Regional Office to set due dates for completing the tasks in the improvement plan. Test cases will be provided to the State once all of the required changes have been 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. No further on-site reviews will be conducted unless ACF receives information questioning the quality of the State’s data, and it is determined that an on-site visit is necessary.

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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 process was developed. The AFCARS assessment review evaluates a State's information system's capability to accurately collect, extract and transmit the AFCARS data to the Administration for Children and Families (ACF). The system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. A second focus of the AFCARS review is to assess the State's child welfare staff's ability to collect and document information accurately 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 assessment review consists of a thorough analysis of the State's system program 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**

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. The following chart lists the factors that were used for the analysis of the State's AFCARS:

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"> <li>• The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens).</li> <li>• There is no program logic to extract the data.</li> </ul>
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> <li>• The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> <li>• The State uses defaults for blank information.</li> <li>• Information is coming from the wrong place on the system.</li> <li>• Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens.</li> </ul> </li> <li>• The system needs modification to encompass more conditions, e.g., disability information.</li> </ul>
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"> <li>• The system functions as required, but-- <ul style="list-style-type: none"> <li>• the data are underreported due to inconsistent data entry.</li> <li>• the data are not being entered and/or there are no supervisory controls for ensuring data entry.</li> </ul> </li> </ul>
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, then the data will then 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 finding of a 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**

Two major areas are assessed 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.

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 each of the foster care and adoption data elements, the general AFCARS requirements, and the case file review. The AFCARS reporting period under review was April 1, 2001 through September 30, 2001 (2001B).

This report and the matrices reflect changes made by the agency staff to the foster care program code since the on-site review and the issuance of this report. Also, as part of the post-site visit analysis there were further re-examination of the program code, notes made by the review team during the on-site review, and the re-submitted AFCARS data files for the report period under review. As a result, some of 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 then the new rating. The AFCARS improvement plan in Tab B contains the final rating factor. The final rating factor also takes into account the post on-site changes made by the agency staff.

### **Strengths**

Strengths identified by the Federal review team during the review include:

- A very dedicated staff and good working relationship between technical and program staff.
- There were no areas found to be in full non-compliance.
- A significant percentage (49%) of the foster care and adoption (51%) elements were in full compliance.
- There were many areas needing improvement that the staff had already identified.
- There is good use of the information system by caseworkers to record case information.

We reviewed 37 foster care and nine adoption paper case files. A significant amount of the data in the AFCARS report matched the information the reviewers found in the paper file. Three areas had the greatest number of records where the data did not match. These were in the foster care file: disability information; information pertaining to removals; and, foster parent demographics. A detailed summary of the case file findings can be found at Tab A. Findings from the case record review are consistent with the findings from the review of the AFCARS program code.

## **General Requirement Errors**

### Technical Requirements (Factor: 2)

- Extraction

The State is not extracting the foster care records based on the transaction date of discharge (ACYF-PI-CB-95-09, Re-issued May 23, 1995).

The State has corrected the program code and submitted the revised code to ACF. The revised code is now correct.

- Conversion

The State did have a conversion plan and committed a considerable amount of time and resources to converting data from the legacy system to the new Statewide Automated Child Welfare System (SACWIS). However, the accuracy and quality of several elements were effected by the conversion. The dates of first removal and latest removal (if the removal occurred prior to conversion) were added to the legal screen, which is not where the program code goes to get the information for the removal episode. The AFCARS data incorrectly reflects the date of conversion for all cases open at the time of conversion, and that are still open, for the date of first and latest removal. Other elements effected are #19, the number of removals from home; #20, date of discharge from the last removal episode; and #24, the number of placements in the current episode.

The conversion issue presented in 11 of the 17 case records reviewed (65%). The effected cases showed the conversion date in AFCARS (July 28, 1997), while the actual date of removal ranged from 1988 to 1997. The results were nearly the same for the date of latest removal.

The State must develop and implement a process that will allow this information to be entered on all appropriate open cases. The process the State develops must also be able to accommodate cases that re-open where there was a removal prior to 1997.

The State has proposed adding a “historical” screen to the system to collect and report historical data. The review team agreed with the States proposed approach.

### Statewide Automated Child Welfare Information System (SACWIS)

Some of the recommended and required changes to the system may require the State to submit an update to its Advanced Planning Document, especially if the changes result in a significant commitment of resources, change in scope, or a change in schedule. The State should coordinate the findings and changes required from the AFCARS review with its response to the SACWIS Assessment Review Findings.

## Data Element Errors

Based on the on-site findings and the post-site visit analysis, thirty-three percent (22) of the foster care and thirty-eight percent (14) of the adoption data elements require system modifications. Once the program logic changes are made, the State will need to monitor caseworkers' data entry to ensure that the quality of the data continues to improve.

Changes made to the system with regard to data entry will inevitably result in improved data quality. 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.

- Information on Children Diagnosed with Disabilities (Foster care elements number 10 through 15)

The State has a policy requiring that a child receive a medical and/or psychological evaluation within a specified period of time of their removal from home. However, it appears that the workers are not keeping the information up-to-date in the electronic case file. One reason may be that there are two places in the system where a worker can enter this information. One is on the "Removal From Home Reasons" screen. There is a section where the worker checks the question "Does child have a clinically diagnosed disability?" If the answer is "yes," the worker checks the box then selects all the medical categories that apply. On the "Certification of Special Needs" screen workers again have to record the disability information. The screen contains two radio buttons, one for adoption and one for foster care. The information on this screen actually pertains to adoption elements nine through fifteen and not to the disability information in foster care. Also, the current program code extracts data from the information on the removal screen. Having two screens for workers to record disability information may be contributing to the under-reporting of information pertaining to a children with disabilities in foster care.

The State already has a plan that should address the issue of reporting the disability information. This September, the State will implement release 3.1, which will have new disabilities screens. Information will be entered only on medical information screens using more diagnostic codes and verification.

- Placement and Foster Parent Information (Foster care elements number 23 - 24, 41, and 49 through 55)

The review identified two issues with regard to the placement information that the State is extracting for AFCARS. One issue is that "trial home visit" and "runaway" are not options for workers to select for the "current placement setting," element #41. Instead, workers select these as "placement end reasons" and not as a current location of the child.

A more significant issue is that the State contracts with placing agencies for therapeutic foster care. The State is not reporting the actual location of the children placed in these homes/group

homes. If the child moves from one setting to another within the contracted agency, the number of placement moves are also not being reported. The contract agencies do not have access to FACTS and they do not provide the information to the workers in order for them to enter it into the system. There are several elements for which quality and accuracy of the data is effected. These are: foster care #23, date of placement in current setting; #24, number of previous placement settings; #41, current placement setting; and elements #49 - #55 that pertain to the demographic information of foster parents.

- Title IV-D, Child Support Information (Foster care elements number 62)

The SACWIS plan, based on the SACWIS assessment review, addresses the lack of a title IV-D interface. The frequency report shows all records as “does not apply.”

The worker can enter this information on the child’s assets screen. It would require receiving information from the Child Support Office that a payment had been received. We recommend that the State develop a process to receive this information until the interface is completed. The AFCARS information is required regardless of the status of the interface.

- Issue of false “no” data (Foster care elements number 10 and 16)

The review identified two areas that provide a false response in the AFCARS data due to a flaw in system design. The two primary areas affected include the information regarding whether a child has been diagnosed with a disability and whether the child has been previously adopted. Both questions appear on the screen with a checkbox for the worker to select if the answer is “yes.” However, one cannot interpret what a blank response means.

In the case of whether a child has been diagnosed with a disability, if the box is not checked it is not known whether the answer is a true “no,” if the child has not been seen by a physician, or the worker has skipped over the question. The AFCARS definitions for “no” and “not yet determined” are:

**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.

Additionally, the State incorrectly maps blanks as “no;” missing data must be mapped to blank. When making the modifications for the new release, the State must include the options for workers to select “Yes,” “No,” and “Not yet determined” and map missing data to blanks. In regard to whether a child has been previously adopted, the situation is the same. If the box is not selected one cannot know what this truly means. In the event the child had been abandoned, the worker does not have the option to select “unable to determine.” Again, the program code sets a blank response to “no.” The State needs to modify the screen to allow the worker to select “yes,” “no,” and “unable to determine.”

## **Data Quality**

Several elements (18% for foster care, 11% for adoption) are being correctly extracted by the program logic, but data quality remains an issue. Addressing this issue will require additional training of caseworkers regarding the use of the system and of specific screens, 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).

## **CONCLUSION**

In summary, the State has implemented a good case management system that caseworkers are encouraged and expected to maintain as the official case record. The State must address the issues related to “historical” data and therapeutic foster care placements as soon as possible. These two areas contain crucial information pertaining to a child’s experience with foster care and knowing where a child is actually placed twenty-four hours a day, seven days a week.

Tab B contains the AFCARS Improvement Plan. The plan contains the AFCARS general requirements and the data elements that have been determined to not meet the requirements in the Federal regulations. Each has a matrix that contains a column for the task, the date the task is to be completed, and one for comments.

Within 30 days after the receipt of this report and the attached AFCARS Improvement plan, State staff are requested to contact the ACF Regional Office with proposed timeframes for implementing 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 to the Regional Office. Additionally, the State workplan 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 extracted test data file will be arranged with the ACF Regional Office and OIS.

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, the AFCARS Improvement Plan will be considered finished. Once all tasks and, if necessary, revisions based on the test cases, have been completed the State should submit the completed improvement plan to the ACF Regional Office. The State will receive a letter summarizing the final results of the review. No further on-site reviews will be

conducted unless ACF receives information regarding the quality of the State's data and it is determined that an on-site visit is necessary.

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 National Resource Center for Information Technology in Child Welfare (NRC-ITCW). The Resource Center can be contacted at (877) NRC-ITCW (672-4892), or at its web page: <http://nrcitcw.org>. If you wish to request on-site technical assistance from the NRC-ITCW, contact your ACF Regional Office.