West Virginia AFCARS
Assessment Report

July 2003

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Executive Summary

From March 17 – 21, 2003 staff of the Children's Bureau, Administration for Children and Families (ACF) Region III, and the Office of Information Services (OIS) conducted an assessment review of West Virginia's Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was April 1 through September 30, 2002.

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 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.

The State is correctly reporting the adoption population and is in full compliance with the technical general requirements. Based on the on-site findings and the post-site visit analysis, 17% (11) of the foster care and 43% (16) of the adoption elements are reported correctly. Additionally, the State's information system - FACTS (Families and Children's Tracking System) - has several features that can be used to encourage data entry and data accuracy.

The State is not in full compliance with AFCARS standards that apply to the foster care reporting population. We have identified three issues related to the foster care population. One is that the AFCARS standards require States to report on children who have been in out-of-home care for more than 24 hours. The State is including those children who have been in care for less than 24 hours. Also, the State is accurately reporting in AFCARS the children that are returned home while under the agency's responsibility for care and placement. However, if the child is returned home for a specified period of time that exceeds six months, the State is considering the child discharged at the time the child had been home for six months. The State should include these children in AFCARS for the full specified period of time. Lastly, children that are on a "runaway" status are excluded from the foster care population. The State must include children that remain in the agency's responsibility for care, placement or supervision while the child is on "runaway" status.

There are 28 (42%) of the foster care and 14 (38%) adoption data elements that require system modifications. In addition, 27 (41%) of the foster care and 7 (19%) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve.

While there are system modifications (either to the screens or to the program code that extracts the AFCARS data) that need to be completed, many are relatively simple to correct. The more significant issue is the accuracy, completeness and quality of the data extracted from FACTS. In several instances, the program code extracting the AFCARS data maps missing data to valid AFCARS values. This masks underlying data entry issues. This has significant implications for the interpretation of West Virginia's data. For instance, if workers do not enter information regarding a child's medical and/or psychological condition, the interpretation of the data is that children in West Virginia's responsibility for care and placement are not receiving medical exams. The lack of complete data provides an incomplete overview of the practice of child welfare in West Virginia. The State will need to address additional worker training, increased supervisory oversight of timely data entry, and additional edits in the information system.

Another finding was that information on placements for children placed with contract providers is not being reported by the providers to the agency and, therefore, not being entered into the system. This has a significant impact on the accuracy of the current placement setting for the child and the number of placement moves. The case file review indicated that children had more placement moves than were reported in AFCARS.

Other significant findings were in the areas of the information collected on the child's disabilities and the primary basis for special needs. In regard to whether a child has been diagnosed with a disability, there was an error in the program code that required all medical conditions to be present before the response to the question could be "yes." The State staff corrected this problem and the data submitted for the report period ending March 31, 2003 reflects a higher response rate for "yes." The data continues to be underreported. The detailed findings section and the element matrix in Appendix B identify additional system changes that need to occur. Once the system modifications are completed, attention will need to be given to the quality of the data by ensuring timely and accurate data entry by the caseworkers.

The issue related to the adoption element "primary basis for special needs" relates to the program code having a hierarchy that determines the primary basis for special needs on adopted children. There is not a field on the screen for the adoption specialist to enter the primary basis for determining special needs. A field must be added to the screen to identify a primary basis for special needs and remove the hierarchy from the program code.

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 B). Some rating factors differ from those given on the draft findings matrices left with the State, due to further post-site visit analysis. The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab C).

Within 30 calendar 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 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. 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 <u>all</u> 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

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.

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. Tab A includes 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 (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 C 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 B 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, 2002 through September 30, 2002 (2002B).

As part of the post-site visit analysis of the State's documents, the data, the case file review findings, and team member notes are assessed to make the final determination of findings. 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 B reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab C contains the final rating factor. Several changes to the rating factors were made due to the final analysis of the paper case file review.

Strengths

The State has implemented several features into their SACWIS system - FACTS (Families and Children's Tracking System) - since its Statewide Automated Child Welfare Information System (SACWIS) Assessment Review. Many of these features can be used to encourage data entry and data accuracy. One of these features is a bulletin board that allows messages to be sent between supervisors and their workers and/or unit. Supervisors could use the bulletin board to remind a worker(s) to update case records and to send reminders regarding the proper use of certain values on the input screens. Another feature is the title IV-E eligibility determination module that was implemented to allow AFDC (Aid to Families and Dependent Children) determination for title IV-E in FACTS. The State intends to use the framework for this module for the AFCARS summary section in FACTS. Another good feature of FACTS is that caseworkers can update information from summary screens. If information is missing from the summary report, there are hyperlinks that will link to the screen where the information needs to be entered. This feature is going to be extended to the AFCARS elements. A significant improvement to the system links the court and placement screens together. The State has also implemented several edit checks into the system (i.e., date edit checks) and is adding ad hoc management reports. The reports can be run statewide, by county and by worker.

Based on the on-site findings and the post-site visit analysis, 17% (11) of the foster care and 43% (16) of the adoption elements are reported correctly. The State is also correctly reporting the adoption population.

General Requirements - Population Errors

The standards for the AFCARS foster care population require that children who have been placed in out-of-home care for more than 24 hours be included in the reporting population. Currently, the State is including children that have been in care for less than 24 hours. The State needs to make a correction to the way it extracts the foster care population to exclude children that have not been in care for 24 hours or more. The State may need to use the date and time that the child was placed to indicate whether the child had been in care for less than 24 hours.

Also, children who have been in foster care and are returned to their home while under the placement, care, or supervision of the State agency must be included in the AFCARS population. If the child is returned home for a specified period of time, the requirement is that the State report the child in AFCARS for the entire specified period of time. If the child is returned home for a non-specified period of time, and the timeframe exceeds six months, the State may consider the child discharged from care, placement or supervision for AFCARS purposes. The State has been reporting all children that are returned home under the responsibility of the agency with discharge dates after six months, regardless of a specified period of time that may exceed six months. The State must include these children in the AFCARS report as appropriate, and according to the criteria listed above.

Data Element Errors

Based on the on-site findings and the post-site visit analysis, 42% (28) of the foster care and 38% (14) of the adoption data elements require system modifications. 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 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.

- Information on Children Diagnosed with Disabilities (foster care elements #10 - 15)

This is an area that needs significant attention with regard to both system design and caseworkers entering the information. One of the problems associated with the quality of the data was due to an error in the program code that requires all the disabilities to be selected before element #10 can be answered as "yes." The State indicates this has been corrected and the frequencies for the report period ending March 31, 2003 indicate a higher response rate.

A more significant finding is that the State's information system does not ask the question "Has the child been clinically diagnosed as having a disability?" If none of the conditions are checked, then the program code maps blank information to "not yet determined." This results in inaccurate data. For AFCARS purposes, ``not yet determined'' indicates that "a clinical assessment of the child by a qualified professional has not been conducted." The State must modify the system to include this question and the values "yes," "no," and "not yet determined." This will provide more accurate information regarding whether a medical or psychological professional has seen a child.

The State's system also has more than one location where medical and disability information can be entered by the caseworkers. The State needs to review the screens and the system design and decide which screen is most suitable for the entry of this data, or modify the program code to check each of the screens.

There is an extensive list of State medical and psychological codes in the program code. There are some conditions that could be reported to AFCARS that the State is not mapping. At the end of the Tab C, the AFCARS Improvement Plan, there is a table listing the State's codes and the appropriate AFCARS value.

Additionally, the design of FACTS requires caseworkers to re-enter medical information on a child if the child re-enters foster care. The State should consider "moving" prior medical information into the new removal episode. A tickler could be added to remind workers to review the information and update appropriately.

- Hierarchy in the program code that determines primary basis for special needs (adoption element #10)

There is not a field on the screen for the adoption specialist to enter the primary basis for determining special needs. Instead, the system determines the primary basis by following a hierarchy written into the program code: medical, emotional, intellectual handicap; age; sibling; race and over age of three; and other.

The State must add a field on the screen to identify a primary basis for special needs and remove the hierarchy from the program code.

- Information on sources of Federal support/assistance for the child (foster care elements #59 - 65)

The requirement for these elements is to report if a payment has been made on behalf of the child during the six-month report period. Instead, the State is incorrectly reporting if the child is eligible for one of these sources of income. This has specific implications for the title IV-E foster care reviews, and must be modified accordingly.

- Missing data due to defaults

Of the elements that require a system change, many of them (seven foster care and six adoption elements) only require a change of mapping missing data to blanks and not to a valid AFCARS value. Additionally, eight foster care elements and one adoption element need defaults corrected along with additional system modifications. While this will be an easy correction to the system requirements, it will require workers to enter any missing data and clean up data fields. The State should note that by removing the defaults the data elements may fail the AFCARS 90% standard for incorrect data.

Data Quality

Forty-one percent (27) of the foster care and 19 percent (7) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve. The majority of the data quality issues are to due to timely entry of data by caseworkers, and keeping the information up-to-date. As noted in the previous section, there are many elements that will need to be further assessed for accuracy once the default values are removed from the program code. Workers will need to clean up and add missing data.

- Data accuracy regarding removal dates and the number of removals (foster care elements #18 through #21)

While the State had a very well-developed plan for data conversion to the new SACWIS, there were some inaccuracies noted during the case file review that need to be addressed, and the data needs to be cleaned up.

Also, training needs to be provided to workers on how to enter placement changes for youth that are placed in juvenile justice facilities while still in the State's responsibility for care and placement. Workers must be instructed not to enter these placement changes as discharges from

care. The incorrect entry of this information also affects the accuracy of the information for current placements, date of placement and the total number of placements.

- Missing data on foster care placements provided by the contract providers

We have determined that not all placements made by private providers are entered into the system. The staff assisting with the case file review indicated that there was a lot of missing information regarding the private agency providers. The lack of this information being shared with the agency in a timely manner affects several of the foster care elements. These include: the date of the current placement, the current placement, the family structure of the foster family, and the demographics of the foster family. The State must address this area as soon as possible and clean up the affected data files.

- Increased supervisory oversight of data entry by workers

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).

CONCLUSION

While there are a number of system modifications (either to the screens or to the program code that extracts the AFCARS data) that need to be corrected in order to improve the accuracy and quality of the State's data, many are relatively simple to correct. The more significant issue is the accuracy, completeness and quality of the data extracted from FACTS. This relies on caseworkers entering the data, and supervisors reviewing the cases.

The issue of mapping missing data to valid AFCARS values masks underlying data entry issues. This has significant implications for the interpretation of West Virginia's data, especially in the areas of "has this child been previously adopted?" (foster care element #10), disabilities (foster care elements #10 – 15), and "was the mother married at the time of the child's birth?"(adoption element #18).

Another major finding was that information on placements for children placed by contract providers is not being given to the agency and entered into the system. This has a significant impact on the accuracy of the current placement setting for the child and the number of placement moves. The case file review indicated that children had more placement moves than what were reported in AFCARS.

Tab C 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, 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 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. 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. To request on-site technical assistance from the NRC-ITCW, contact your ACF Regional Office.