

Rhode Island AFCARS Assessment Report

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Executive Summary

From June 24 – 28, 2003 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region I, and the Office of Information Services (OIS) conducted an assessment review of Rhode Island’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 evaluated 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.

Since the on-site visit, the State staff made corrections to the program code and submitted a revised version. These changes are incorporated into the final analysis and findings for the State’s AFCARS assessment review. As a result, some of the rating factors were updated to reflect the work completed by the State. The rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	3

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	15 (23%)	16 (43%)	31 (30%)
3	36 (55%)	6 (16%)	42 (41%)
2	15 (23%)	15 (41%)	30 (29%)
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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). 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).

Overall, the most significant area the State needs to address is the accuracy of the data entered into the electronic case file, specifically data entry. 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.

In the area of the general requirements the most significant problem is in the population requirements. The State is not including the complete foster care and adoption population required under AFCARS. The standards for the AFCARS foster care population require that the State include all children in foster care for whom the agency has responsibility for placement, care, or supervision (45 CFR 1355.40(a)(2)). This includes children who have been in foster care and are returned to their home while still under the placement, care, or supervision of the State agency. 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 is required to continue reporting these children to AFCARS (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population). There appears to be some children that are returned home, but are still in the agency's responsibility for care, placement or supervision and the State is reporting them as "discharged" in AFCARS. The State will have to address this as a training issue with workers and ensure that the correct foster care population is included in AFCARS each reporting period.

The standards for the adoption population require that the State submit all adoptions that it has involvement with either due to the child being in its foster care system and/or one in which there is an adoption agreement. The State has adoption agreements and subsidies with families that adopted a child through a private agency and the child is a special needs child. The State is not including these adoptions in AFCARS. The State must include these children.

There are a few areas that that need significant modifications to the program code or to the screens. One of these is the collection of disability information on children in foster care. Currently, the program code is masking underlying data entry problems by mapping missing data to a valid AFCARS value (not yet determined). This results in an inaccurate picture of the health/mental health condition of children in foster care in Rhode Island. Another problem is the limited number of medical/psychological conditions that the workers can select. This may result in workers not selecting a medical condition because of uncertainty of how to categorize the condition. The results of the case file indicate that there were several psychological conditions that were either not reported, or were reported as "other medical condition."

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.

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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 collect, extract, and transmit the AFCARS data to the Administration for Children and Families (ACF) accurately. 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

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements, and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. 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 the State's documents, the data, the case file review findings, team member notes, and the State's revised program code 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.

General Requirements

Population Standards

The State is not including the complete foster care and adoption population required under AFCARS. The standards for the AFCARS foster care population require that the State include all children in foster care for whom the agency has responsibility for placement, care, or supervision (45 CFR 1355.40(a)(2)). This includes children who have been in foster care and are returned to their home while still under the placement, care, or supervision of the State agency. 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 is required to continue reporting these children to AFCARS (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population). Based on our analysis and discussions with the State, there appears to be children that are returned home, but are still in the agency's responsibility for care, placement or supervision and the State is reporting them as "discharged" in AFCARS. The State will have to address this as a training issue with workers and ensure that the correct foster care population is included in AFCARS each reporting period.

The standards for the adoption population require that the State submit all adoptions that it has involvement with either due to the child being in its foster care system and/or those in which there is an adoption agreement. The State has adoption agreements and subsidies with families that adopted a child through a private agency and the child is a special needs child. The State is not including these adoptions in AFCARS. The State must include these children.

Technical Standards

In regard to the technical standards, the major problem is that the State does not extract the AFCARS files based on the transaction date associated with either the date of the current removal from home or a discharge from care, placement, or supervision (ACYF-PI-CB-95-09, Re-issued May 23, 1995). This results in fluctuations in the number of children being reported in AFCARS each report period and missing data regarding discharges. Instead the State based its extraction on service codes and, therefore, was extracting information on children that were not in the State agency's responsibility for care, placement, or supervision. The State has made corrections to the program code and the data will be extracted based on the transaction date.

Data Elements

Of the 103 data elements, the State is in full compliance with 31 (30%), needs to improve the quality in at least 42 (41%), and make system corrections to 30 (29%). Listed below are the areas that the Federal review team found to have the most significant issues.

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

According to the frequency report for the report period under review, there were 1,601 (49%) children that had not been to a medical professional for an assessment of their health and mental health needs. Also, there were only 748 (23%) children within the State's foster care population that were diagnosed with a medical/psychological condition. This is an area that needs significant attention with regard to both system design and caseworkers entering the information. One of the problems is that there are a limited number of medical conditions that the workers can select. This may result in workers not selecting a medical condition because of uncertainty of how to categorize the condition. The results of the case file review indicate that there were several psychological conditions that were either not reported, or were reported as "other medical condition." Additionally, the screen and the program code defaults to "not yet determined," which is why the frequencies indicate children have not been evaluated by medical professionals.

- Has the child been previously adopted and the age at time of the adoption (foster care elements #16 and #17)

The State has a good approach to collecting this information. The State included this as a question for caseworkers to answer on the screen and the caseworker can enter the date the adoption was legalized. From the legalization date the program code calculates the age of the child at the time of his/her adoption. The problem with these elements is that the screen pre-fills with the response "no." Therefore, the worker can save the screen without addressing the question. This is resulting in data that cannot be truly relied on to be accurate. The State needs to leave the question blank, thus, forcing the worker to address the question. This should increase the reliability of the data. The State will need to monitor this information once the program code is changed to ensure it accurately reflects the circumstances of the foster care population. During the case file review, reviewers identified five children that had been adopted prior to the child's current removal episode. While this was a small number of cases it represents 11% of the cases reviewed. The State should also consider adding an age field to the screen. This would allow the worker to estimate an age at the time of adoption if the legalization date is unknown.

- Information on Removal Episodes (foster care elements #18 – 22, 26 – 40, and 56 - 58)

The State needs to ensure the accuracy and completeness of these elements. The State designed the system with the removal information and placement information on the same screen. To differentiate between dates of removal and dates for placement, the worker selects a field to indicate whether the "placement" was due to a removal from home. Once this box is checked the question is not asked each time the child is moved from placement to placement. When the worker selects that the placement is due to a removal, the worker also gets a "pop-up" window with the circumstances associated with removal. However, the worker can answer "no" even if the "placement" is due to a removal from home. This is creating missing or underreported data for several elements. The State needs to either implement an on-line edit check or have supervisors monitor the accuracy of this data.

Once the State starts to extract data based on the requirements in ACYF-PI-CB-CB-95-09, reissued May 23, 1995, there could possibly be records that will not be extracted because the removal flag was not checked. This would result in an underreporting of the foster care population.

- Placement Information (foster care elements #23, 24, and #41)

The State has corrected most of the system errors, however, there are some that still need to be completed. The State's system did not extract to AFCARS all possible locations that a child may be "placed" in while under the agency's responsibility for care, placement, or supervision. The State was not reporting children that were on runaway status as a placement setting. The State still needs to update the program code to ensure that the "date of current placement" reflects the date the child ran away. Also, the State was not using "trial home visit" as a placement setting for those children that were placed back in their own home while still under the agency's care, placement or supervision. The State must ensure the program code also extracts the start date for these "settings."

The State will need to monitor these data elements to ensure that the placement information accurately reflects the situation of the child 24 hours/seven days a week. The State also needs to review and apply the policy clarification issued July 5, 2002 in the Children's Bureau's Child Welfare Policy Manual on placement settings.

- Case Plan Goal (foster care element #43)

The State has a practice that the case plan goal must be established within 60 days of the assignment of the case to the Family Services Unit worker. This is not always within 60 days of a child's removal from his/her home. The State must ensure that all case plans are established within 60 days of child's removal from home.

- Primary basis for special needs (adoption element #10)

The State has a field for "primary" basis for special needs. However, based on the case file review, it appears that there was a higher incidence of workers selecting the first item (age) on the list, instead of the actual primary basis. Also, the State will be including deferred payments as a part of the adoption agreements with families. This may be based on conditions that the child may be "at-risk" for developing in the future. The State needs to add a category to reflect this situation and map these conditions to "other" state-defined special needs.

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

The State collects this data but it may be underreported in regards to multiple relationships. The system allows the worker to select only one relationship (step-parent, foster parent, other relative or other non-relative) of the adoptive parent to the child. For instance, if the adoptive parent was a relative and had been a foster parent, the worker has to select only one condition and the data are underreported for the number of relatives that were foster parents and adopted a child. The

State must provide ACF with the proposed screen print reflecting the change it is making to the system.

CONCLUSION

Overall, the most significant area the State needs to address is the accuracy of the data entered into the electronic case file, specifically data entry. 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.)

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.

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 of its progress 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.

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.