

Texas AFCARS Assessment Report

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Prepared by:
Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services

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Executive Summary

From June 24 – 28, 2002 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region VI, and the Office of Information Services (OIS) conducted an assessment review of Texas’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was October 1, 2001 through March 31, 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 implemented a very comprehensive approach to creating management reports. The use of web-based technology allows the creation of data reports on several different levels, including at the caseworker level. The State should continue to expand on this approach and use it to ensure accurate and complete data on children and foster parents.

Based on the on-site findings and the post-site visit analysis, 73 percent (48) of the foster care and 41 percent (15) of the adoption data elements require system modifications. In addition, six percent (4) of the foster care and 14 percent (5) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve. While the State implemented a system that is user-friendly, in certain cases this approach has affected the accuracy and completeness of the data (i.e., information on Hispanic/Latino origin, children with disabilities, and those that have been previously adopted). Accordingly, there may be an under-reporting of data to the Federal government and a corresponding lack of data available for the State’s use. The State agency is currently undergoing changes to the existing system (using web-based technology for the data entry screens). As it proceeds in this direction, it should consider making changes to the screens that collect medical information and placement characteristics. Also, while several of the data elements did receive a rating factor of “2,” many of these will be corrected with only a few system modifications, specifically in the area of data collected from the Texas Youth Commission.

One area of significant concern is how the agency has programmed discharge dates into the program code for all children that are returned to their home while the agency retains responsibility for the placement, care or supervision of the child. Children that are returned home under these circumstances for a specified period of time must be included in the AFCARS report until the agency no longer has responsibility for the child.

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). 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 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 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 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"> • 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 data. |
| 2 | <p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on 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. |
| 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"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry. |
| 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, 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 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 October 1, 2001 through March 31, 2002 (2002A).

As part of the post-site visit analysis 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 A reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS improvement plan in Tab B contains the final rating factor. Several changes to the rating factors were made due to the findings from the paper case file review. While the number of cases reviewed was small (38), in several areas there were a significant number of records where the data reported to AFCARS did not reflect the information reviewers found in the paper documents. Several of these areas are discussed in latter sections of this report.

Strengths

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

- ❑ A good working relationship exists between program and technical State staff.
- ❑ The review process was enhanced by the participation of State strategic planning and regional staff in addition to program and technical staff.
- ❑ The State has implemented a functional data warehouse that facilitates child welfare practice and is a well-received management tool.
- ❑ Web-based management reports provide accessibility to, and increased usability of, child welfare data.
- ❑ The State did not receive any findings of full non-compliance.

General Requirements - Population Errors

The AFCARS foster care population must include all children under the placement, care or supervision of the State agency. This includes children who have been in foster care and are returned to their home while under the placement, care or supervision of the State agency. If the child has been returned home for a specified period of time, then the State includes them in the population for the specified period time. If a time period is not specified, then the agency continues reporting that child in the AFCARS population for up to six months. If the agency's responsibility for placement, care or, supervision is terminated by the court prior to six months, then that date is entered as the discharge date. Otherwise, if the non-specified period of time extends beyond six months, the agency is to enter the date the child has been in its own home for six months as the discharge date.

The agency includes in the AFCARS report the children that have been returned home while in the State's placement, care or supervision. The program code includes conditions that check if the child's placement is their "own home." Then the program code will check to see if there is a discharge date prior to the end of the report period. If there is no discharge date, it will calculate a discharge date that is six months from the date the child was placed in his or her home, if this date falls within the current report period. As we understand the State's laws and policies, children may be returned home for a specified period of time or for non-specified periods of time. Because there is not a State law or policy that limits the time the agency can have responsibility for the placement, care or supervision of a child that is returned home, the agency must change the program code by removing the date calculated and have the caseworkers enter the actual discharge dates.

This approach also affects the information reported for foster care elements #19, 20 and 21 regarding information on the start of the removal episode. Since the State is reporting those children that have been returned for a specified period of time but discharged after six months, if the child re-enters care this should be treated as the same removal episode. The State currently reports this as a new removal for the child.

The State staff asked how to handle situations where a judge extends the specified period of time a child is to remain at home. Under this circumstance, the agency is to continue reporting that child until the court dismisses the State of responsibility for the placement, care or supervision of the child.

Data Element Errors

Based on the on-site findings and the post-site visit analysis, 73 percent (48) of the foster care and 41 percent (15) 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.

- Information on Race and Hispanic and Latino Origin (foster care elements number 9 -10, 52 – 55 and adoption elements number 7 – 8, 25 – 28)

The State is accurately collecting racial information. However, the AFCARS elements “race” and “Hispanic or Latino Origin” data elements allow the selection of “unable to determine.” For AFCARS purposes the definition of this value is:

“The specific race category is ‘unable to determine’ because the child is very young or is severely disabled and no person is available to identify the child’s race. ‘Unable to determine’ is also used if the parent, relative or guardian is unwilling to identify the child’s race.” Or, in the case of adults, “...is unwilling to identify his or her race or ethnicity.”

In CAPS if the worker selects “unable to determine” for race, then the field for Hispanic/Latino origin information is disabled and “unable to determine” is submitted to AFCARS as the response to both elements. This approach does not meet the AFCARS requirements. There may be instances when an individual may identify his or her Hispanic or Latino origin and refuse to identify a race. The connection between race and ethnicity must be separated and “unable to determine” must be added as an option for the Hispanic or Latino information.

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

The State and Federal teams agreed that the State’s number of children in foster care that are diagnosed with a disability are under-reported in AFCARS. This may be due to the way the system is designed to capture disability information. The State has included in one screen the characteristics of the child that are necessary for appropriate placement of a child with conditions that have been diagnosed by a medical professional and may be reported to AFCARS. Case workers may be recording the significant issues related to placing a child, which may be based on observations and not a medical diagnoses. After the child is placed, this information may not get updated once caseworkers receive medical evaluation reports. Also, there are some conditions that could be reported to AFCARS that the State is not mapping. The detailed findings and the AFCARS Improvement Plan list some options the State may consider to make system design changes. The State should give strong consideration to improving the collection of this information.

- Information reported on Texas Youth Commission (TYC) youth

As a result of the case file review, the State staff realized that certain data were not reported to AFCARS for TYC youth. One significant problem affects the elements for “circumstances associated with removal (foster care elements number 26 through 40). Due to how the system is designed, circumstances associated with removal of TYC youth cannot be entered into the system. The circumstances associated with a child’s removal are entered on the “child characteristics” screen, which is completed at the time a child is removed from his or her home. The TYC cases are entered on eligibility screens that do not have the fields to enter this information. Therefore, a modification is needed to allow the entry of this data.

Another area identified as a problem is related to the dates of removal. The dates reported to AFCARS do not reflect when the child entered a community-based placement. For youth reported to AFCARS as a result of an inter-agency agreement with the Juvenile Justice agency, the date of removal and date of discharge should reflect the date the youth is residing in a title IV-E reimbursable placement, not when the youth entered TYC custody.

- Primary Basis for Determining Special Needs (adoption element number 10)

The State has programmed into the extraction code a hierarchy that determines the primary basis for determining special needs. The caseworkers may enter all of the codes that apply, or can leave the field blank. The development of the hierarchy is based on the State's research of those areas most commonly identified as the barrier to a child's adoption. However, the response to this element in AFCARS should be based on a worker's determination of the leading barrier to the child's adoption, not on a hierarchy that is programmed into the extraction code.

Data Quality

Six percent (4) of the foster care and 14 percent (5) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve. There are several issues that need to be addressed in order to improve the quality and accuracy of the data reported in AFCARS. Some of these pertain to entering accurate data on TYC youth and children placed in out-of-state, non-paid placements.

One area pertains to the information reported on contracted foster parents and non-State agency adoptive parents (foster care elements number 49 – 55 and adoption elements number 22 –28). There were a significant number of records reported to AFCARS with missing foster parent information. There is a process in place to receive the information on contractual foster parents, however, either the data is not being received by the agency or it is not being entered. With regard to private agencies that recruit adoptive parents that are used for agency adoptions, the caseworkers are not required to enter the information from the homestudy into CAPS. As a result, demographic information is missing for these individuals.

Another area where there is incomplete data reported to AFCARS is in regard to historical data that was not entered during the conversion to CAPS. While the State did implement a conversion plan for historical data, it was identified in the case file review that some of the AFCARS records did not have complete information. In many cases, the correct date of first removal, date of discharge from a previous removal, or the correct number of removals were incorrect.

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

There are several 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. Several corrections will result in improved reporting of information on the TYC youth. The most significant issue relates to the State's reporting of children returned home for whom it has responsibility for placement, care or supervision. It is not acceptable for the system to calculate discharge dates on these children.

The State implemented a very comprehensive approach to creating management reports. The use of web-based technology allows the creation of data reports on several different levels, including at the caseworker level. The State should continue to expand on this approach and use it to ensure accurate and complete data on children and foster parents.

Tab B contains the AFCARS Improvement Plan (AIP) consisting of an adoption and foster care matrix. The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 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.