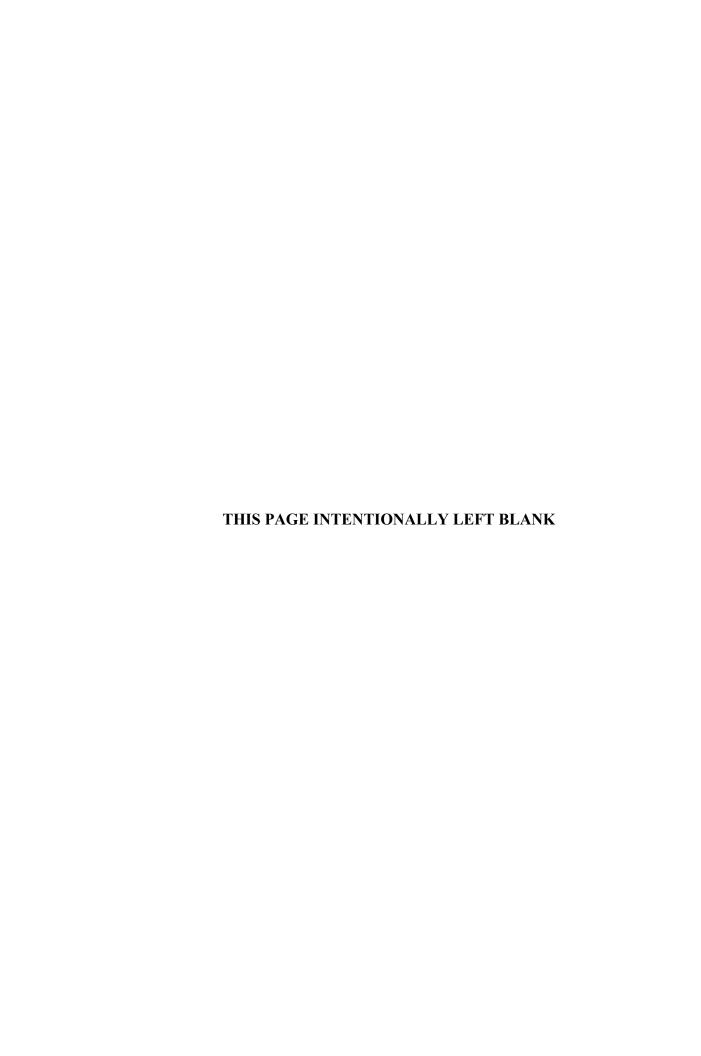# Arkansas AFCARS Assessment Report

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Executive Summary

On June 4 - 8, 2001 the Children's Bureau and the Office of Information Services (OIS) conducted an assessment review of Arkansas's Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was April 1, 2000 through September 30, 2000.

There are two major areas that are assessed as part of an AFCARS assessment review. They are 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 1 (non-compliant) to 4 (compliant) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale.

The Federal review team identified a number of strengths related to how the State has developed its AFCARS collection and reporting:

- The State staff identified and made some appropriate required system modifications prior to the site visit.
- Management reports are sent to the local offices informing staff of corrections that need to be made to data.
- The State has included several mandatory AFCARS fields within its information system.
- The State maintains high-quality technical documentation of its system.
- The information system has a good screen design that displays removal and placement history.
- The State has implemented a good technical approach for the collection of the date of discharge from a removal episode.

Prior to scheduling the AFCARS assessment review, the State had modified the system program code. At the time the program code was re-written, State agency staff identified areas that needed changes and implemented several of the changes for the report period that ended March 31, 2001. Additionally, the staff made many other changes during the week of the review. As a result of these efforts, the Federal team was able to assess many of the changes either on-site or during the post-site segment of the review and incorporate the findings into this report.

The State was found to have fully satisfied the general requirements regarding the foster care and adoption reporting populations. The State did not fully meet the general technical requirements. Specifically, the problems were due to the method the State used to convert data from the legacy information system to the new SACWIS, encryption of case record information, and the extraction routine for the foster care data elements.

Seventeen percent (11) of the foster care data elements collected by the State were compliant with the AFCARS requirements. Eighteen percent (12) of the foster care data elements require training for case workers and monitoring of the data to ensure improvement in the quality and accuracy of the data. The remaining sixty-five percent (43) of the element require system modifications. Forty-nine percent (18) of the adoption data elements collected by the State were compliant with the AFCARS requirements. Sixteen percent (6) of the adoption data elements require training for case workers and monitoring of the data to ensure improvement in the quality and accuracy of the data. The remaining thirty-five percent (13) of the adoption elements require system modifications. Once the program logic changes are implemented, the State will need to ensure that the quality of the data improves by monitoring caseworkers' data entry.

Significant elements requiring system modifications relate to the information regarding placements, removal information, disability information on children in foster care, whether a child has previously been adopted prior to the current removal episode, and for children adopted, information on their special needs. The AFCARS information does not accurately reflect the current living arrangement of children or the number of placement settings they have had during the current removal episode. The problems with the AFCARS information regarding removal episodes concern the dates of removal and discharge, reasons for and manner of removal, and the number of removals from home a child has experienced in his/her lifetime. The problems with the dates for first removal and the total number of removals experienced by a child center around those cases that were open, and continue to be open, prior to the State's conversion to the Children Reporting Information System (CHRIS).

A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings Matrices" for foster care and adoption data elements (see Tab A, section 2). The findings matrices incorporate post-site visit findings. On June 22, 2001, the State implemented changes to both the system screens and the program logic. The State was instructed to freeze these changes and not to implement additional changes that may affect the AFCARS data. The documentation from the June 22nd roll out was submitted to ACF for review. Tasks that were a part of the on-site findings, and have been implemented correctly, are noted in both the findings matrices and the AFCARS Improvement Plan (Tab C).

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 changes that are required to be made to the information system 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, a letter will be sent to the State from the Children's Bureau. The letter will include a summary of the actions taken by the State and will include the completed AFCARS improvement plan. No further on-site reviews will be conducted unless information comes to the attention of ACF regarding the quality of the State's data.

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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 process primarily focuses on a State's information system's capability to accurately collect, extract and transmit the AFCARS data to the Administration for Children and Families (ACF) in accordance with 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 accurately collect and document information related to the foster care and/or adoption case of a child. The review process goes beyond the edit checks that must be met in order to pass the AFCARS compliance error standards. The review ascertains a State's degree of meeting all of the AFCARS requirements, and the quality of its data. Additionally, while this is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide assistance to State agency staff. During the review the Federal team provides guidance on improvements that can be made to the system, and 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. By doing this, 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 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 may be penalty free, but does not have accurate, reliable, and quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population, for the correct time period required by the regulations.

Information collected from each of the components of the assessment review is combined to rate each data element. The general requirements are also assessed and rated separately using the same scale. A scale of 1 (non-compliance) to 4 (full compliance) is used to assign a compliance factor. The following chart lists the factors that were used for the analysis of the State's AFCARS.

FACTOR	DEFINITION
1	The AFCARS requirement(s) has not been implemented in the information system. For example: • 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	The technical system requirements for AFCARS reporting do not fully meet the standards. For example:
	• The State information system has the capability (screen) to collect the data, but the program logic is incorrect - -
	  • The State uses defaults for blank information.
	  • Information is coming from the wrong place of 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	The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.
	• The system functions as required, but--
	  • 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	All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.

For elements and general requirements that have been determined not to be in compliance (factors 1 through 3), the State will be 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 this case, the element will be given a "2" to denote the need for the system logic to first be modified. Once the corrections are made to the system, then the data needs to be re-analyzed. If it appears 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 be assessed as fully satisfying 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 have a direct relationship with each other. When this occurs, all related elements are given the same factor. This is 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 found 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 should implement the AFCARS improvement plan, under Tab C of this report, as a way to improve the quality of its data.

FINDINGS

Two major areas are assessed during an AFCARS assessment review. These are 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 definition 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 elements, the general AFCARS requirements, and the case file review. The AFCARS reporting period under review was April 1, 2000 through September 30, 2000 (2000B). Data from the report period October 1, 2000 through March 31, 2001 (2001A), and the re-submitted 2000B AFCARS file were also used for comparison purposes during the post-site visit review phase.

Strengths

The State was found to fully satisfy the general requirements for the reporting population. Based on the analysis of 34 foster care paper case files, a significant amount of the data in the AFCARS report matched the information the reviewers found in the paper file. Several of the errors were found in the cases opened prior to the conversion of data from the State's legacy system to the Children Reporting Information System (CHRIS).

Other strengths identified by the Federal review team in regard to the way the State has developed its AFCARS collection and reporting are:

- The State staff identified and made appropriate required system modifications prior to the site visit.
- Management reports are sent to the local offices informing staff of corrections that need to be made to data.
- There were no standards that received a finding of non-compliance.
- The State's information system has several mandatory AFCARS fields.
- The State maintains high-quality technical documentation.
- The information system has a good screen design that displays removal and placement history.
- The State has implemented a good technical approach for the collection of the date of discharge from a removal episode.

Also, the information system allows for collection of education information on foster care children and other well-being indicators. This should help the State know more about the children in an independent living (ILP) placement before they are emancipated.

The program code was re-written from COBOL programming language to structure query language (SQL). At the time the program code was re-written, the agency staff identified areas that needed changes and implemented several of those for the report period that ended March 31, 2001. Additionally, the staff made many other changes during the week of the review. Because of this, the Federal team was able to assess many of the changes either on-site or during the post-site segment and incorporate the findings into this report. Another strong point of the State's program logic is that it did not contain many defaults of missing data to valid AFCARS values. When the State made corrections to the program code, missing data were mapped to blanks and not to valid AFCARS values for most of the data elements. The data extracted for the 2001A report period were based on the new program code.

General Requirement Errors

Transaction Dates. The State must extract all foster care records based on the transaction date of discharge (see ACYF-PI-CB-95-09, Reissued May 23, 1995). The State had not been extracting the cases based on the transaction date. During the site visit, the agency staff stated that as of the 2001A transmission, the foster care extraction was based on the transaction date. During the Federal team's post-site visit analysis, it appears the correct extraction method was used for the 2001A file, but not for the resubmitted 2000B file.

In order for the AFCARS submissions to accurately reflect the correct data as of the end of the report period, the transaction date and extraction routine must be correct. By not extracting the cases based on the transaction date, fluctuations occur between regular and subsequent submissions. This brings into question the reliance of the data for use in reports, data profiles, etc.

Case Record Numbers. The State has been using both sequential and encryption routines for the case record number. The State must choose a method and consistently use it for each report period. The program code has been modified to use an encryption routine as of the 2001A report period.

While the State has the option to use either sequential numbering or an encryption routine, the Children's Bureau would prefer the State use an encryption routine. This allows a more reliable method to create and annual file from the two six month submissions.

Conversion. The agency did not add closed cases to CHRIS at the time of conversion from the legacy system. Also, it would appear there was not a policy to require workers to enter the entire removal history on open cases. The majority of the errors found in the case file review were related to "historical[1]" data. The sample of cases was selected based on dates of latest removal that occurred prior to the date CHRIS became operational Statewide.

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[1] Date of first removal, total number of removals, and date of discharge from the last foster care episode.

A number of the cases do not accurately reflect the number of removals, and the date of first removal from home. Some of these cases had dates of latest entry into foster care after October 1, 1995[2]. Therefore, all the data, including historical information, are required for AFCARS reporting purposes. If a case re-opens, "historical" data cannot be entered into the system by the worker. The agency needs to add a "historical" data screen, or develop some other method to collect "date of first removal from home", "number of removals", and whether the mother was married at time of the child's birth.

These changes will have an impact on the data that are used by the State for program and evaluation and for the Federal National Standards. The information that the State has provided may significantly be under-reporting the number of removals from home that a child has experienced.

Data Element Errors

Sixty-five percent of the foster care and thirty-five percent of the adoption data elements require system modifications and subsequent training for caseworkers. Once the program logic changes are made, the State will need to ensure that the quality of the data continues to improve by monitoring case workers' data entry.

Also, please note that as you implement corrective action the changes you make to your system and with regard to data entry will inevitably result in improvement in the quality of data. This may correspondingly result in the failure of the State's semi-annual submission of the AFCARS data to meet the missing data standard and, consequently, the assessment of a penalty. In order to ensure that the data are complete, the agency will need to require workers to enter the data, and the validity of the data will need to be assessed prior to submitting it to ACF. This can be done with the management reports created by the agency, using the Data Quality Utility, and the Frequency Utility.

- Information on Children Diagnosed with Disabilities (Factor: 2 Number of elements affected: 6)

In the foster care data set, element #10 asks if the child has been clinically diagnosed with a disability. If the response is "yes", then some or all of the applicable disability categories (medical condition, mental, physical, emotional disability, or other medically diagnosed condition) are to be selected. The State's system logic derives the response to the question by checking if the caseworker has selected any of the categories. If none of the categories are selected then "not yet determined" is selected as the response to whether a child has been diagnosed with a disability. This method may be resulting in an under-reporting of the number of children determined to not have a disability. In the 2000B file on 560 records of 4,479 records were marked as "applies." The AFCARS definitions for "not yet determined" and "no" are:

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[2] For cases that were open prior to October 1, 1995, and continue to be open, only "core" data elements are subject to the AFCARS penalties in 45 CFR 1355.40(e).

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.

The State's use of a default prevents elements that are blank from failing the AFCARS penalties. However, by defaulting missing data to "not yet determined" the State's data is misleading, and it may be masking the possibility that case workers are not properly filling out the screen that list the types of disabilities. The State must default missing data to blanks. The best approach to collecting this data is to have a question on the screen and the worker to select: "yes," "no," or "not yet determined." Additionally, the selections should not be pre-set, instead each selection should be blank and the worker selects the answer. The screen may need to be made mandatory.

It is also probable that the under-reporting of disability information is due to not all disability information being mapped to AFCARS values. Tab D contains a list of medical conditions and the appropriate mapping to AFCARS.

The data in the 2001A report period indicates that 1,125 records of 5,015 were marked as "applies," 3,143 were "no," and 747 were marked as "unable to determine." This indicates an improvement in the collection and reporting of this information.

- Information on Special Needs Adoptions (Factor: 2 Number of elements affected: 7)

AFCARS asks for the primary basis for determining special needs, this should be based on what the worker and his/her supervisor believe is the main barrier to adoption. In CHRIS, the caseworker selects all of the applicable reasons, which are then alphabetized in the selected box on the screen. The program logic selects the first one on the list for reporting to AFCARS. The agency needs to allow the worker to select a primary basis in addition to all other reasons that may apply. If this information is accurately entered, then the response to "has the agency determined special needs" could be derived from whether a selection was made for the primary basis. Otherwise, the system should be modified to include the question "has the agency determined special needs" with "yes/no" as options for the workers to select.

For those children for whom the primary basis for determining special needs was a "medical condition, mental, physical or emotional disability," the same issue described above related to children diagnosed with disabilities apply to the special needs information. Additionally, the State currently does not carry forward the information pertaining to a child's disability information from the foster care record to the adoption record, therefore, the caseworker has to re-enter the information. It may be helpful for this information to populate the relevant adoption record information and may result in more accurate information.

- Information Regarding Placements (Factor: 2 Number of elements affected: 3)

The State is not collecting placement information for the AFCARS values "runaway" and "trial home visit". The State must add these as a status for placement setting on the input screens. Also, note that these "placement" settings should not be counted in the "number of placement settings" (foster care element #24). If a child returns from a "trial home visit" or "runaway" to the same foster care setting, then the number of placement settings does not change.

There are several State placement codes that need to be removed from the program code and the caseworker selection list. Additionally, the number of previous placement settings in a removal episode is significantly high. In reviewing the program code and through discussions with the agency staff, it appears the cause is due to the design of the program logic, which is counting every placement setting. For instance, moves that occur for reasons of respite or short term hospitalizations were included in the count of previous placement settings. AFCARS policy is not to count these types of placements. Tab B includes additional questions regarding changes made in the June 22, 2001 version of the program logic. The agency has corrected many of the errors in the program logic. However, the frequency numbers for foster care element #24 remain high in the 2001A file. The agency will need to implement data cleanup procedures.

Also, the State is currently not mapping any placement settings to "group homes." The State is mandated not to have group homes due to a lawsuit. However, it appears that there are placement settings that meet the AFCARS definition of group home. The AFCARS definition is:

> "A licensed or approved home providing 24-hour care for children in a
> small group setting that generally has from seven to twelve children."

In order for the Children's Bureau to be able to compare data on placement settings across all States, the information submitted must meet the AFCARS definition. The agency must map settings that meet the above definition to group home, and not to family foster homes or institution. The State should footnote its AFCARS foster care data file for this element by stating that the State does not license group homes. This information will then be added to reports published by ACF.

- Information Regarding Circumstances Associated with Removal (Factor: 2 Number of elements affected: 16)

This is information that is known at the time of the child's removal from home, and should not be updated based on information learned after the removal. The system allows workers to update this information. The agency needs to modify the system to "freeze" circumstances associated with removal. Also, based on the frequencies and the case file review, it appears that workers are not selecting all of the circumstances that apply.

- Information Regarding Discharge Dates and Reason (Factor: 2 Number of elements affected: 2)

The agency has designed a good method to ensure dates of discharge are entered into the system. The date of discharge (foster care element #58) is automatically populated when the worker enters an end date for a foster care placement with a permanency reason. Workers do not enter the date of discharge. However, the frequencies for the date of discharge and the reason for discharge (foster care element #56) should be consistent. There should be an equal number of discharge reasons as there are discharge dates. The State staff reported that there are certain circumstances when a discharge reason does not get entered when a case closes. For instance, if a placement setting is closed without a permanency reason, and the exit from placement was due to the child/youth running away, at the point in time that DHS is relieved of custody, the worker enters the date of discharge from foster care on the legal status screen. However, the worker is not currently required to enter a discharge reason. The State is implementing a change in the next release that will have a pop-up window to enter a permanency goal. The new release should not allow a discharge date without a discharge reason.

Data Quality

There were several elements (18% for foster care, 16% for adoption) that are being correctly extracted by the program logic, but there could be an improvement in the quality of the data. This is primarily a data entry issue and will require additional training of caseworkers on the use of the system and of specific screens, and monitoring by supervisors. The State staff suggested modifications that can be done from a system perspective to enhance the quality of the data, for instance, making some additional screens/fields mandatory. The agency is currently using several good management reports to provide information to line supervisors. It was suggested that this approach could be built upon by adding a couple more reports in several areas.

The State staff needs to check that the number of foster care children in independent living is not undercounted. Current undercounts may be due in part to faulty conversions of case records, where foster children in independent living placements were coded as being placed in institutions.

CONCLUSION

Tab C contains the AFCARS Improvement Plan. The plan contains the AFCARS general requirements and the data elements that have been determined to not satisfy the requirements in the Federal regulation. Each has a matrix that contains a column for the task, date the task is completed, and for comments. The tasks that ACF has reviewed during the post-site visit phase, and that are correct, have been marked as completed on June 22, 2001.

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 training of

caseworkers 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).

After the State completes the system changes, it should contact the ACF Regional Office and provide it with the completed improvement plan. 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.

Also, in order to assess the quality of the data, ACF will create a frequency report 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. The State will receive a letter summarizing the final results of the review. No further on-site reviews will be conducted unless information comes to the attention of ACF regarding the quality of the State's data.