

Vermont AFCARS Assessment Report

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Executive Summary

From April 29 – May 2, 2002 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 Vermont’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was April 1, 2001 through September 30, 2001.

Two major areas are assessed as part of an AFCARS assessment review: the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted. Each of the 103 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.

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

- ❑ A very dedicated staff and good working relationship between technical and program staff.
- ❑ There were no areas found to be in full non-compliance.
- ❑ A significant percentage of the foster care and adoption elements were in full compliance.
- ❑ The State is in full compliance with the population and technical general requirements.

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

The majority of required changes to the system are minor. The largest area that warrants the State’s attention involves monitoring the data for continuous improvement and providing training to the caseworkers. The primary areas that require changes in the program code and screen design include the collection of disability information and circumstances associated with a child’s removal from home. The State has a plan in place to implement a “health history screen” by the fall of 2002. This screen should greatly enhance the reliability of the data reported on disabilities.

A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings Matrices” for the foster care and adoption data elements, and the general requirements (See Tab A). The minimum tasks that are required to correct the State’s reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B).

Within 30 days after the receipt of this report and the attached AFCARS improvement plan, State staff are requested to contact the ACF Regional Office to set due dates for completing the tasks in the improvement plan. Test cases will be provided to the State once all of the required changes have been completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children's Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS improvement plan. No further on-site reviews will be conducted unless ACF receives information questioning the quality of the State's data, and it is determined that an on-site visit is necessary.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review process was developed. The AFCARS assessment review evaluates a State's information system's capability to accurately collect, extract and transmit the AFCARS data to the Administration for Children and Families (ACF). The system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. A second focus of the AFCARS review is to assess the State's child welfare staff's ability to collect and document information accurately related to the foster care and/or adoption case of a child. The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements, and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system, and recommends changes to the program code used to extract the AFCARS data.

Each assessment review consists of a thorough analysis of the State's system program documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy, and State staff's understanding of the data elements. The data is also compared against a small randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

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

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. The following chart lists the factors that were used for the analysis of the State's AFCARS:

FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • 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, then the data will then be re-analyzed. If problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A finding of a factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a “2” will be assigned. If it appears the problem is due to data entry, then a “3” will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor, because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used

for several significant activities at the Federal and State level, the State must implement the AFCARS improvement plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

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

This section provides the major findings resulting from the review of the State's AFCARS data collection. Tab A provides detailed information on the findings for each of the foster care and adoption data elements, the general AFCARS requirements, and the case file review. The AFCARS reporting period under review was April 1, 2001 through September 30, 2001 (2001B).

This report and the matrices reflect changes made by the agency staff to the foster care and adoption program code since the on-site review and the issuance of this report. Also, as part of the post-site visit analysis there was further re-examination of the program code and notes made by the review team during the on-site review. As a result, some of the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a "strike-through" mark on it, and then the new rating. The AFCARS improvement plan in Tab B contains the final rating factor. The final rating factor also takes into account the post on-site changes made by the agency staff.

Strengths

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

- ❑ A very dedicated staff and good working relationship between technical and program staff.
- ❑ There were no areas found to be in full non-compliance.
- ❑ A significant percentage of the foster care and adoption elements were in full compliance.
- ❑ The State is in full compliance with the population and technical general requirements.

Data Element Errors

Based on the on-site findings and the post-site visit analysis, 32 percent (21) of the foster care and 22 percent (8) of the adoption data elements require system modifications. Once the program logic changes are made, the State will need to monitor caseworkers' data entry to ensure that the quality of the data continues to improve.

Changes made to the system with regard to data entry will inevitably result in improved data quality. The State's semi-annual data submission may as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter

the data, and assess its validity prior to submitting it to ACF. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility.

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

It appears that the workers are not keeping the information on a child's disabilities up-to-date. The State staff explained that this may be due to the fact that the screen used to record this information is the initial "face sheet" screen. The caseworkers are not likely to return to this screen after a case is opened and, therefore, don't update disability information that is received at a later time.

The State has developed a plan that should address the issue of accurately reporting the disability information. It intends to add a "health history screen" to the system in the fall of 2002. In the meantime, the State should encourage supervisors to review this data and encourage workers to update it periodically.

- Number of Previous Placement Settings (Foster care element number 24)

Currently, the State is including "respite settings" in the number of placements. The State needs to exclude placements that are for respite purposes. Additionally, any short-term stay that lasts for more than 24 hours in a crisis placement setting is to be included.

- Circumstances associated with removal (Foster care elements number 26 through 40)

This category resulted in the majority of the rating factors of "2" given to the State. While it affects several elements, it requires only one system modification. Currently, the State's information system has the capacity to record only nine circumstances associated with removal. The information system should have the capacity to record all of the circumstances listed in the AFCARS regulation. The screen must be re-designed to allow more space for workers to record the information. Workers will need to be trained in order to ensure that all of the circumstances associated with a child's removal are entered into the system.

- 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 are able to enter all of the codes that apply, or can leave the field blank. The response to this element in AFCARS should be based on a worker's determination of the leading barrier to the child's adoption and not a decision process that is programmed into the extraction code.

Also, the program code maps missing information for this element to "no" in the AFCARS question "has the agency determined special needs" (adoption element #9). This provides a false "no" in the data. Instead, missing information should be mapped to blank in adoption element

#9. Currently, the data cannot be analyzed with confidence that the response of “no” actually means that the agency did not determine the child to be “special needs.”

Data Quality

Several elements, 20 percent (13) for foster care and 19 percent (7) for adoption, are being correctly extracted by the program logic, but data quality remains an issue. Also, many of the foster care elements now have a rating factor of “3” due to the corrections made to the program. The frequencies for these elements need to be re-assessed by ACF, which will require the State to re-submit the 2001B files. The State should negotiate a re-submittal date with the Regional Office.

Also, in order to improve the quality of the data, additional training of caseworkers regarding changes in the system and of specific screens is required, as well as monitoring by supervisors to ensure accurate data entry. The State may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review (see AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E).

CONCLUSION

In summary, the State has implemented a user-friendly information system that caseworkers are encouraged and expected to use for recording case information. This is reflected in the high percentage of fully compliant elements and the moderate amount of system changes that are required to bring the State’s AFCARS collection and reporting into full compliance. Additionally, because the State has been using the current information system for several years, it has contributed to the State’s collection of consistent and stable data.

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

Within 30 days after the receipt of this report and the attached AFCARS Improvement plan, State staff are requested to contact the ACF Regional Office with proposed timeframes for implementing the improvement plan. The State and the ACF Regional Office (in conjunction with the Children’s Bureau) will discuss the completion dates outlined by the State and negotiate the final due dates. The State should provide written quarterly updates to the Regional Office. Additionally, the State workplan for implementing the changes to the system and for caseworker training must be included in the State’s title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The State should contact the ACF Regional Office once it has completed the changes to the system. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of

the extracted test data file will be arranged with the ACF Regional Office and 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, the AFCARS Improvement Plan will be considered finished. Once all tasks and, if necessary, revisions based on the test cases, have been completed the State must submit the completed improvement plan to the ACF Regional Office. The State will receive a letter summarizing the final results of the review. No further on-site reviews will be conducted unless ACF receives information regarding the quality of the State's data and it is determined that an on-site visit is necessary.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's National Resource Center for Information Technology in Child Welfare (NRC-ITCW). The Resource Center can be contacted at (877) NRC-ITCW (672-4892), or at its web page: <http://nrcitcw.org>. If you wish to request on-site technical assistance from the NRC-ITCW, contact your ACF Regional Office.