North Dakota AFCARS
Assessment Report

December 2003

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Executive Summary

From August 4 - 7, 2003 staff of the Children's Bureau, Administration for Children and Families (ACF) Region VIII, and the Office of Information Services (OIS) conducted an assessment review of North Dakota's Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS data used for the review was from the report period October 1, 2002 through March 31, 2003.

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. Tab A includes a chart that lists the factors that were used for the analysis of the State's AFCARS. The rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	4

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	22 (33%)	16 (43%)	38 (37%)
3	3 (4.5%)	0	3 (3%)
2	41 (62%)	21 (57%)	62 (60%)
1	0	0	0

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 State has several "technical" corrections to make to the program code and the screens that collect the data. Several of the elements default missing data to a valid AFCARS value. Therefore, the element passes the AFCARS data standards and masks underlying data entry issues. Additionally, the State's data may be under-reported, and/or inaccurately represent the full population, due to the program code not properly assessing all records. There is an inconsistency in how the program code checks for information in the "foster care" and the "birth

counseling" records. The program code for some elements does not check both programs and results in the under-reporting or misrepresentation of the data.

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 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 after six months. The State is required to continue reporting these children to AFCARS (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population). Some children who are returned home, but are still under the agency's responsibility for care, placement or supervision, are being reported 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 each AFCARS reporting period.

When reporting race and Hispanic/Latino Origin, States are permitted to report "unable to determine" for those children who have been abandoned and for individuals who refuse to identify their race or that of their child(ren). The State needs to add the option "unable to determine" to the appropriate screens. Another issue relates to race information for foster parents and adoptive parents. Individuals may identify with more than one race so the information system must be able to collect information accordingly. The screens that collect information on foster and adoptive parents do not allow the entry of more than one race.

Another area that appears to be under-reported is information on the number of children diagnosed with a disability. Currently, the program code is masking underlying data entry problems by mapping missing data to a valid AFCARS value. The State maps missing data to "no." This results in an inaccurate picture of the health/mental health condition of children in foster care in North Dakota. 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 it is not listed.

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.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, we request that State staff 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 State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of 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 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 technical 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 data used for the review was from the report period October 1, 2002 - March 31, 2003 (2003A).

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 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 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 after six months (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population). In North Dakota, some children who are returned home, but are still under the agency's responsibility for care, placement or supervision, are being reported 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 each AFCARS reporting period.

Data Elements

Of the 103 data elements, the State is in full compliance with 38 (37%), needs to improve the quality in at least 3 (3%), and make system corrections to 62 (60%). Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. 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. Listed below are the areas that the Federal review team found to have the most significant issues.

- System defaults for missing data

There are several elements that are mapped to a valid AFCARS value if there is missing data for the element. The State's AFCARS data files would then never fail the missing data standard (which was used previously to assess penalties). In some instances, such as with the race and Hispanic/Latino Origin elements, the information is a required field but the program code contains default language. If the worker is required to enter the information, then there is no need to have language in the program code to map missing data to a valid AFCARS value.

- Program code does not always assess the "foster care" and the "birth counseling" records

There is an inconsistency in how the program code checks for information in the "foster care" and the "birth counseling" (BC) records. The program code for some elements does not check both programs and results in the under-reporting or misrepresentation of the data. One example of this issue is the elements associated with the reasons why a child entered foster care. If there is a "BC" record, it sets all circumstances except for "relinquishment" to "does not apply." If

there were a foster care record on the child, the circumstances associated with the most recent removal episode would not be reported.

- Information on race and Hispanic/Latino Origin

The State has a common database that is shared with other State programs. When an individual is entered into the child welfare information system, the Comprehensive Child Welfare Information and Payment System (CCWIPS), a search is conducted to see if this person is known to the State and if his/her demographic information is in the common database. If the person's information is in the database then it does not need to be re-entered. The race and Hispanic/Latino Origin fields are mandatory fields that workers must complete when entering a new person into the information system. There is a hierarchy for the entry of data into the database and who "owns" the data. The offices for Medicaid and the Temporary Assistance to Needy Families programs (TANF) have precedence over child welfare for "ownership" of the data. Once information is entered by either of these programs, the child welfare agency cannot make changes to it. The problem in regard to child welfare and the AFCARS data is that the database does not include "unable to determine" as an option and the agency does not include this field on its input screens. Since race and Hispanic/Latino Origin are to be self-reported, AFCARS contains the value "unable to determine." This means that if a child was abandoned, there is no one who can identify the child's race. We have also issued clarification that if a person refuses to identify his/her race, or that of their child, then the worker can enter "unable to determine." The State needs to add the option "unable to determine" to the screens.

Another issue with the collection of the race information relates to information on foster parents and adoptive parents. Individuals may identify with more than one race and the information system must be able to collect multiple races. The screens that collect information on foster parents and adoptive parents do not allow the entry of more than one race.

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

The State staff indicated that this information is under-reported. For the report period under review, there were 920 (54%) "yes" responses, 599 (35%) for "no," and "not yet determined" was 175 (10%). One issue is the limited number of medical conditions that workers can select. Workers may not select a disability condition because it is not listed on the option list. Another issue is that the screen does not contain the question "Has this child been diagnosed with a disability?" and the options of "yes," "no," and "not yet determined." The State's current approach is to interpret the lack of information as "no." Instead, the worker may have skipped this field or hasn't received the information from a doctor. Another issue that could be contributing to a lack of data is that workers' information entered into narrative notes is never collected in the database. The State should make this a question for workers to answer and increase the number of options the worker can select.

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

There were several issues relating to the collection and reporting of placement information. The State's system did not extract to AFCARS all possible locations that a child may be "placed" 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 who 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.

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

On August 1, 2003 the State added a category of "at-risk" to its conditions that identify a child as "special needs" for adoption purposes. The State did not modify its information system in order to begin collecting this information as of August 1st. The State needs to add this to the input screen and map these conditions to "other" state-defined special needs. This should be in place in order to be reported in AFCARS for the report period that ends March 31, 2004.

- 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

The State has several "technical" corrections to make to the program code and the screens that collect the data. Several of the elements default missing data to a valid AFCARS value. Therefore, passing the AFCARS data standards and masking underlying data entry issues. Additionally, the State's data may be under-reported, and/or inaccurately represent the full population, due to the program code not properly assessing all records. The State is not reporting the full removal episode of children as defined for AFCARS reporting purposes. The State must report children that are in its responsibility for care, placement or supervision until the agency no longer has this responsibility, regardless of placement location.

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.)

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, we request that State staff 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's plan 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.