

**Utah  
AFCARS  
Assessment Review  
Report**

**November 2005**

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and  
Office of Information Services  
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U.S. Department of Health and Human Services**



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## Executive Summary

From July 11 - 15, 2005, 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 Utah’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in SAFE (not an acronym). The AFCARS data used for the review was from the report period October 1, 2004 - March 31, 2005 (2005A).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): 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. 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 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). 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)	Adoption (37)	Total (103)
4	15 (23%)	15 (41%)	30 (29%)
3	7 (11%)	13 (35%)	20 (19%)
2	44 (66%)	9 (24%)	53 (52%)
1	0	0	0

The State has technical corrections that must be made to the program code or to the State’s system, but most of these are minor corrections to the extraction code. As noted in the above table, the State is in full compliance with the technical standards. The State is not in full compliance with two foster care population standards and one of the adoption population standards.

For AFCARS reporting purposes, children that are in the State’s responsibility for care and placement whose first, and/or only, placement is in a locked facility or a hospital, the State should not include this child’s record in AFCARS. If the child moves from these settings to a “traditional” foster care setting, then at this time the child’s record is to be included for reporting

purposes and the date of removal would reflect the first “traditional” foster care setting. The State was including these situations in its AFCARS. The State has modified the program code and ACF will review and monitor the data to ensure accuracy.

Also, the staff noted that there are instances when a child is placed in the care and placement responsibility of the agency, but the child may be on runaway status, or runs away after the agency has care and placement responsibility, but before the child is taken to the foster care setting. The State currently excludes children on runaway status in this situation. The State must include these youth in its foster care population at the time of becoming a runaway.

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

Of the 44 foster care elements that received a rating of “2,” fifteen relate to the circumstances associated with removal and seven relate to demographic information on foster parents. The changes to both of these areas, which the State had already identified and is working on, will involve only a few changes, but impact several elements. The changes will also necessitate changes in the screens in SAFE.

The program code used by Division of Juvenile Justice Services (DJJS) was not reviewed until the post site visit phase, and errors were noted. Consequently, some of the ratings changed from what were given on site, and these corrections must be made to the DJJS program code. Most of these are minor corrections related to mapping of the DJJS values to the AFCARS values. Overall, DCFS is accountable for the accuracy of the AFCARS data. Therefore, the findings are applied regardless of which of the two program codes or data sets were incorrect. However, in certain instances where the quality of the data was a result of inaccuracies in the DJJS data, the findings were separated.

The State needs to improve the quality of its data. Several items were given the rating of “3” because of underreporting of information and will necessitate additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider reviewing the data in the file at the time of a periodic review to ensure it is accurate and up-to-date. (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 the Administration for Children and Families (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. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency’s responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). 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 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff are to submit the Improvement Plan electronically to the ACF Regional Office, OIS, and the Children's Bureau with estimated due dates for completing the tasks in the Improvement Plan.

The State should contact the ACF Regional Office once it has completed its AIP. 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 resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

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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 (AAR) 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 AAR 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. Below is a chart that lists the factors that were used for the analysis of the State’s AFCARS.

RATING 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"> <li>• The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens).</li> <li>• There is no program logic to extract the data.</li> </ul>
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> <li>• The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> <li>• The State uses defaults for blank information.</li> <li>• Information is coming from the wrong place on the system.</li> <li>• Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens.</li> </ul> </li> <li>• The system needs modification to encompass more conditions, e.g., disability information.</li> </ul>
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"> <li>• The system functions as required, but-- <ul style="list-style-type: none"> <li>• the data are underreported due to inconsistent data entry.</li> <li>• the data are not being entered and/or there are no supervisory controls for ensuring data entry.</li> </ul> </li> </ul>
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**

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 the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period October 1, 2004 - March 31, 2005.

As part of the post-site visit analysis, the State’s documents, the data, the case file review findings, team member notes, the States’ corrected program code, and the Division of Juvenile Justice (DJJS) program code for their Access database were assessed to make the final determination of findings. As a result, 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.

There were several instances where the Division of Family and Children Services’ (DFCS) program code and data quality were compliant, but the program code and/or data quality for DJJS were not. Overall, DCFS is accountable for the accuracy of the AFCARS data. Therefore, the findings are applied regardless of which of the two program codes or data sets were incorrect. However, in certain instances where the quality of the data was a result of inaccuracies in the DJJS data, the findings were separated.

### **General Requirement Standards**

For AFCARS reporting purposes, children that are in the State’s responsibility for care and placement whose first, and/or only, placement is in a locked facility or a hospital, the State should not include this child’s record in AFCARS. If the child moves from these settings to a “traditional” foster care setting, then at this time the child’s record is to be included for reporting purposes and the date of removal would reflect the first “traditional” foster care setting. The State was including these situations in its AFCARS. The State has modified the program code and ACF will review and monitor the data to ensure accuracy.

Also, the staff noted that there are instances when a child is placed in the care and placement responsibility of the agency, but the child may be on runaway status, or runs away after the agency has care and placement responsibility, but before the child is taken to the foster care setting. The State currently excludes children on runaway status in this situation. The State must include these youth in its foster care population at the time of becoming a runaway.

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

## **Data Elements**

In general, the State has additional minor technical corrections to make to the program code. There are several corrections that need to be made to the collection of data and mapping done by the DJJS. Many of these changes also are minor. The more significant areas requiring changes are listed below. The staff had identified all of these and the changes are in the development stage. Mostly, these changes will involve modifications to the screens in SAFE.

- Circumstances associated with a child's removal from home (foster care elements #26 - 40)

This area includes several elements; however, once the change is made it will affect all of the elements at once. The agency staff indicated that the collection of this data is being changed. Currently, information is entered in multiple places in the system and the program code extracts the data from each of the locations. A new screen will contain a list of conditions and the worker will select all those that are associated with a child's removal.

- Foster Parent Information (Foster care elements #49 - 55)

This is another area where the State is currently making changes in the way it will collect and record the information. The State is able to track clients in contracted "umbrella" agency foster homes, but is currently unable to identify and record demographic data for these foster parents in SAFE. According to the State, this inability to capture "umbrella" agency foster parents' demographic information is due to the lack of appropriate fields within SAFE to capture the information, the lack of access by "umbrella" agency staff, and the failure of "umbrella" agency staff to provide this information. The State needs to develop a method of identifying and recording required demographic information for contracted "umbrella" agency foster parents in the SACWIS application.

The State is developing and will be implementing the collection of this information. According to the State, it should be implemented in the spring of 2006.

- Case plan goal (foster care element #43)

The State is currently planning enhancements to this module. The enhancements will allow workers to justify the selection of “other planned living arrangement.” Depending on the case worker’s reason, the goal will either be mapped to “emancipation” or “long term foster care.”

### **Data Quality**

Once the above elements are corrected, the quality of the data will need to be assessed. In some instances, training regarding new fields or screens will have to be implemented. In addition to these elements, the quality of the data for an additional 22 foster care elements needs to improve. One way to address accuracy of the data is through additional training and supervisory oversight. The State needs to incorporate ongoing data quality assurance to ensure that the data are correct and consistent.

### **CONCLUSION**

The State has taken a very proactive approach to making necessary technical corrections, both as a result of this review and prior technical assistance provided to the State by the Children’s Bureau. The State has also begun to implement methods to assess the quality of its data on an ongoing basis. Many of these approaches were developed in conjunction with the State’s CFSR program improvement plan. The State will need to add the areas noted in the “findings” section of this report to its training and quality assurance plans.

There are technical issues that need to be addressed, but many of these are minor. Some data quality issues will improve once the State makes the correction to report as discharged those youth that reach the age of majority and are not receiving title IV-E payments. The State has several issues that need to be addressed, both from a practice perspective and a technological one, regarding placement stability for children in foster care. The AFCARS data must be able to accurately reflect the circumstances of children in foster care and under the agency’s responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). 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 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to Kevin Gomez in the ACF Regional Office and Angelina Palmiero in the Children’s Bureau.

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). Once the State has

completed the AIP, notify the ACF Regional Office. 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 as changes to the system and training are addressed and after all system changes and training are completed. 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 resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.