

Washington AFCARS Assessment Report

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Executive Summary

From June 2 – 6, 2003 staff of the Children’s Bureau, Administration for Children and Families (ACF) Region X, and the Office of Information Services (OIS) conducted an assessment review of Washington’s Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was April 1 through September 30, 2002.

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.

Since the on-site visit, the State staff made some corrections to the program code and submitted a revised version dated July 29, 2003. Additionally, the State is piloting changes to some of the screens on the Case and Management Information System (CAMIS). Copies of print screens were also submitted to ACF for review. The analysis of these changes is incorporated into the final analysis and findings for the State’s AFCARS Assessment Review. As a result, some of the rating factors were updated to reflect the work completed by the State. Outlined below is an overview of the results of the AFCARS Assessment Review based on the on-site and post-site visit analyses.

- General Requirements – Foster care and adoption population and technical requirements

The State is in full compliance with the adoption population requirements. In regard to the foster care population, at the time of the site visit it was determined that the State is not including children that have been returned to their own home while in the agency’s responsibility for care, placement, or supervision. The State is required to continue reporting these children to AFCARS. Caseworkers are to enter the date that the child’s “own home placement” began as the date of the current placement setting and enter this child’s placement as a “trial home visit.” At this time, AFCARS does not have a placement setting that reflects “post-reunification, in-home” placements. Additionally, the program code also excluded from the population selection children in certain juvenile justice settings and those on runaway status, both of whom must be included in AFCARS. The State has made corrections to the selection routine in the program code and these cases are no longer excluded in the foster care population. The State will need to describe how it will ensure that workers enter the placement and discharge information correctly.

The State also made corrections to the requirements under the technical requirements. One of the major problems found during the site visit was that the program code was not written to

extract the child's data file based on a transaction date associated with either the date of the current removal from home or a discharge from foster care. This was resulting in fluctuations in the number of children being reported in AFCARS each report period and missing data regarding discharges. The ACF will monitor the submissions of data for two to three report periods to check for any fluctuations in the data.

- Significant Data Element Findings

Based on the final analysis, 11 (17%) of the foster care and 12 (32%) of the adoption elements are reported correctly. There is one foster care element that the State is not reporting, which is the child's source of title IV-D income. Additionally, there are 41 (62%) foster care and 21 (57%) adoption data elements that require system modifications. Lastly, 13 (20%) of the foster care and 4 (11%) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve.

There are some areas that have significant errors in either the way the program code extracts the data or with screens in CAMIS. A significant problem relates to the lack of interfaces with the State's Child Support Enforcement information system and the Medicaid information system. This is affecting the collection and reporting of what is a child's source of Federal funding. In the case of the child support information, the State is not submitting data on whether child support payments are a source of income for the child. The element is set to report "does not apply" on all records when the element should be reported with missing data. Completing the interface is an action item from the State's Statewide Child Welfare Information System (SACWIS) Assessment (conducted in 1997). Whether or not the interface is complete, the State must develop a method to collect and report if child support payments are paid on behalf of the child during each AFCARS report period. The collection and reporting of AFCARS data is required regardless of whether a State has a SACWIS. The development of SACWIS is optional for States. If a State does develop a SACWIS it must, at the time of becoming operational, be able to collect and report all of the AFCARS data. Otherwise, the State is out of compliance with the SACWIS Federal regulations.

For the information on whether Medicaid is a source of "income" for a child, CAMIS contains a field that the staff in the Federal funding unit can use to enter the information. The State's AFCARS data does reflect some records as having Medicaid as a source of income. However, the numbers are under reported. Since the reporting of this information is not dependent on the interface, the State should have the Federal funding staff enter this information into CAMIS.

Also, there was no program code written to extract the amount of the monthly foster care payment. The State added this to the program code during the post-site visit phase. The Federal team recommends some additional changes to ensure more accurate reporting of this data.

Another element the State does not report is whether a mother was married at the time of the child's birth. For AFCARS purposes, this information is collected in the adoption report. The State submitted a screen print to ACF for review that has this question added to it. The current approach is adequate and meets the reporting requirement as a short term solution. However, the question is on an adoption screen and should be on a screen that collects information closer to

the time the child is removed from his/her home. The State should add this to the changes in the “placement/legal” screen.

Other significant findings were in the area of the information collected on the child’s disabilities. There was an error in the program code that resulted in “no” responses to the AFCARS question “Has the child been diagnosed with a disability.” The State staff has corrected this in the program code and a re-submission of the data indicates a change in the responses. One significant problem with the way the information is collected for this question is that CAMIS does not contain it as a question. The screen has a field for the worker to enter the categories of diagnosed disabilities, which is a limited list. The response to the question is derived from this field. So, if there is a code listed for a disability then the response to the question is “yes.” Otherwise, the response is coded as “no.” This is creating a false “no” in the reported data and makes it appear that the State’s children have no medical or emotional problems. The program code has been modified and now the only responses are “yes.” If there are no codes for disabilities, the responses are blank.

Additionally, there are several areas in CAMIS that workers can enter information pertaining to a child’s health. These are: the “Person Record,” the “Kid’s Screen,” and “Passport.” The program code only checks for information on the person record screen. As a short-term solution the State should modify its program code to check all possible screens for information and map it to AFCARS. A longer term solution is to consider consolidating to one screen the collection of all medical related items.

Most of the data elements were coded so that a valid AFCARS response was reported when there was actually no data in the system. While having valid AFCARS values results in the data file “passing” the AFCARS edit checks for determining compliance (which was specifically designed for assessing penalties), this results in an inaccurate reflection of the practice of child welfare, both positive and negative, in the State. It is in the State’s best interest to have accurate data for its own use and for use on the national level.

A significant example of reporting inaccurate data is the State’s reporting of case plan goals. As a result of the case file review conducted during the site visit, it was found that workers are not updating the case plan goal in CAMIS. There were several records indicating the goal as “reunification” when it was actually some other goal, such as “adoption” or “long-term foster care.” The accuracy of this data is especially important with regard to the Child and Family Services Reviews.

Lastly, there are several areas that require ongoing monitoring of the entry of information into CAMIS to ensure accurate and timely data. Some of these elements will require system changes first, but training and follow-up with case workers is also needed.

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).

Within 30 calendar days after the receipt of this report and the attached AFCARS improvement plan, State staff are requested to contact the ACF Regional Office to set due dates for completing the tasks in the improvement plan. Test cases will be provided to the State once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children's Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS Improvement Plan.

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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 collect, extract, and transmit the AFCARS data to the Administration for Children and Families (ACF) accurately. 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 the 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 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 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 reporting period under review was April 1, 2002 through September 30, 2002 (2002B).

As part of the post-site visit analysis the State's documents, the data, the case-file review findings, team-member notes, and the State's revised program code 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 Errors

At the time of the site visit, it was determined that the State is not correctly extracting the foster care population. 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. The State is required to continue reporting these children to AFCARS (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population).

The State provides respite services to families that receive intensive in-home family preservation services by placing the child in foster homes. A voluntary placement agreement is signed with the family allowing the agency to place the child in a respite foster home. The State excludes these children in its AFCARS foster care population. The State is required to report these children to AFCARS.

Additionally, the program code excludes children in certain juvenile justice settings and those on runaway status, both of which must be included in AFCARS.

The State has made corrections to the selection routine of the program code and all of these situations are no longer excluded in the population, unless it is the only placement for the child. The State will need to describe how it will ensure that workers enter the placement and discharge information correctly.

The AFCARS standards also require that States not report in AFCARS children that have been removed from their home for less than 24 hours (Appendix A of 45 CFR 1355- Section II). CAMIS does not include a time entry field, therefore, the program code cannot determine a 24-hour period. The State modified the program code to exclude removals that begin and end on the same day. This will eliminate some of the records.

In regard to the technical standards, one of the major problems found during the site visit was that the State did not extract the AFCARS files based on the transaction date associated with either the date of the current removal from home or a discharge from care, placement, or supervision (ACYF-PI-CB-95-09, Reissued May 23, 1995). This was resulting in fluctuations in the number of children being reported in AFCARS each report period and missing data regarding discharges. The ACF will monitor the submissions of data for two to three report periods to check for any fluctuations in the data.

Also, it was determined that the State was reporting dates that occur outside of the AFCARS report period. The State has modified its program code to check for and extract dates that occur prior to the end of the report period.

Data Element Errors

Based on the on-site findings and the post-site visit analysis, there is one foster care element that the State is not reporting, and 41 (62%) foster care and 21 (57%) adoption data elements that require system modifications. Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data, and assess its validity prior to submitting it to ACF. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF.

- Lack of system capacity to report certain data elements

At the time of the site visit, the State's information system, CAMIS, did not capture the following data elements:

- Title IV-D (Child Support);
- Amount of monthly foster care payment (regardless of source); and
- Was the mother married at the time of the child's birth[?].

The revised program code submitted by the State reflects that program code was added for the amount of the monthly, foster-care subsidy. The State also submitted a copy of screens that it is piloting with workers to collect the information on whether the mother was married at the time of the child's birth.

The State is not submitting data on whether child support payments are a source of income for the child because the interface with the State's Child Support Office is not completed. Completing the interface was also an action item from the State's Statewide Child Welfare Information System (SACWIS) Assessment (conducted in 1997). Regardless of a completed interface with the child support system, the collection and reporting of AFCARS data is a requirement. The development of SACWIS is optional for States and if a State does develop a SACWIS it must, at the time of becoming operational, be able to collect and report all of the AFCARS data. Otherwise, the State is out of compliance with the SACWIS Federal regulations. Whether or not the interfaces are complete, the State must develop a method to collect and report if child support payments are paid on behalf of the child during each AFCARS report period.

The draft screen print that contains the information on whether the mother was married at the time of the child's birth is adequate and meets the reporting requirement as a short-term solution. However, since the question is on an adoption screen and not a screen that is used to enter information at the time the child is removed from home, the State should move the collection of this information. One solution is to use the "placement/legal" screen.

- System defaults for missing data

It was determined that the program code first sets all the elements to spaces, but then initializes most elements to valid AFCARS values. In many instances, the values would end up as the

default value once the routine for each element was executed. This means there would never be any missing data reported to AFCARS, even if there actually was no 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 the revised program code, many of the elements have been initialized to spaces and some of the defaults have been removed. The State must remove the remaining initializations and defaults by the time of its first quarterly update to the AFCARS improvement plans.

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

This is an area that needs significant attention with regard to both system design and caseworkers entering the information. One of the problems is there are several areas in CAMIS that workers can enter information pertaining to a child's health. The State needs to evaluate all of the screens and consolidate the information into one screen, or modify the program code to check each of the screens.

Another problem is the State's information system does not contain the question "Has the child been clinically diagnosed as having a disability?" Instead, there is a field labeled "disabilities" that the workers use to enter the options for disabilities. The program code checks the field for one of the disability codes. If found, then the response to the question is "yes" and the codes are mapped to the appropriate AFCARS categories (foster care elements #11-15). Otherwise, the response to element #10 is set to "no." This is creating a false "no" in the reported data and makes it appear that the State's children have no medical or emotional problems. For AFCARS purposes, "not yet determined" indicates that "a clinical assessment of the child by a qualified professional has not been conducted." The definition for "no" indicates that a qualified professional has conducted a clinical assessment of the child and has determined that the child has no disabilities. The State must modify the system to include this question and the values "yes," "no," and "not yet determined." This will provide more accurate information regarding whether a medical or psychological professional has seen a child.

The revised program code submitted by the State reflects that these elements have been initialized to spaces. The changes made to the program code will result in responses of "yes" only; there will be no responses for "no" or "not yet determined." If the program code does not find a disability code entered into the screen, then this element will be blank. This solution is acceptable for the short term, but the State must make modifications as soon as possible to accurately collect and report this information.

- Has the child been previously adopted prior to this removal episode? (foster care elements #16 - 17)

The purpose of this question is to gather data on any type of adoption, private or public, that the child had prior to the current removal episode. There is a field for "adopted" on CAMIS but there is not a specific question on the screen for the worker to answer. Instead, this information is derived from the States' own adoption records. If an outcome of "adoption" is not found, the program code sets foster care element #16 to "no." This is resulting in a false "no" response.

The state has partially corrected this in the program code. The State is piloting a screen that will ask for this information, plus the type of adoption and the child's age at the time of the adoption.

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

AFCARS collects information on what was the primary barrier to freeing a child for adoption. In CAMIS the workers are able to list all bases for special needs that were determined on behalf of the child. The program code selects a primary basis for AFCARS reporting by extracting the first condition entered by the worker, which is alphabetical. The State needs to redesign the collection of this information in order to specifically designate a primary basis for special needs.

Data Quality

Thirteen (20%) of the foster care and 4 (11%) of the adoption elements are correctly extracted to the AFCARS file, but the quality of the data needs to improve. The majority of the data quality issues are due to lack of timely entry of data by caseworkers, and keeping the information up-to-date. There are many elements that will need to be further assessed for accuracy once the default values are removed from the program code. Workers will need to enter missing data.

- Increased supervisory oversight of data entry by workers

Once changes are made to the program code and/or to the data entry screens, the quality of the data will need to be monitored for accuracy. It may be necessary to implement additional training for caseworkers and monitoring by supervisors to ensure accurate data entry. The State may want to consider system ticklers/edits that will remind workers to update the information at appropriate times, and review the data in the file at the time of a periodic review. (See AFCARS Federal regulation at 45 CFR 1355 Appendix A, I. I. E.)

CONCLUSION

There are a number of system modifications (either to the screens or to the program code that extracts the AFCARS data) that need to be made in order to improve the accuracy and quality of the State's data. The end result of the changes will be improved accuracy, completeness, and quality of the data extracted from CAMIS. This will ultimately be dependent on caseworkers entering the data, and supervisors reviewing the cases.

The issue of mapping missing data to valid AFCARS values masks underlying data entry issues. This has significant implications for the interpretation of Washington's data and for the Child and Family Services review.

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

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

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

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.