

**Wisconsin
AFCARS
Assessment Review
Report**

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and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

Executive Summary

From July 10 - 14, 2006, staff of the Children’s Bureau, Region V, and the Office of Information Services (OIS) conducted an assessment review of Wisconsin’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the electronic Wisconsin Statewide Automated Child Welfare Information System (eWiSACWIS). The AFCARS data used for the review was from the report period October 1, 2005 – March 31, 2006 (2006A).

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 and 26 of the 27 AFCARS general requirements is assessed 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 and general requirement. A scale of zero (State’s SACWIS does not collect one or both of the AFCARS files) to four (fully meets AFCARS standards) is used to assign a factor to each element. A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings” matrices for the general requirements, the foster care and adoption data elements (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 (26)

Rating Factor	Foster Care	Adoption	Technical
4	8 (100%)	3 (100%)	14 (93%)
3	0	0	1 (7%)
2	0	0	0
1	0	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	15 (23%)	19 (51%)	34 (33%)
3	33 (50%)	2 (5.4%)	35 (34%)
2	18 (27%)	16 (43%)	34 (33%)
1	0	0	0

As noted in the above table, the State is in compliance with the reporting population requirements for the foster care and adoption files. However, the State received a rating of “3” for the technical requirement related to data conversion. The State implemented a means to address conversion and the process spanned a four year period. While the State continues to work on converting the data, the State was found to need improvement in the accuracy of the data for removal episodes and placement counts. Not all removal episodes were entered into the system at the time of conversion. Also, for those cases open at the time of conversion, not all

placement settings were entered for the current removal episode. These are areas that are crucial to the evaluation of a State's child welfare practices. In order to determine if the number of children re-entering foster care is actually increasing or decreasing, a complete removal history is needed in the information system.

As noted in the above chart, the need for technical changes and a focus on data quality is evenly spread across the total number of foster care and adoption data elements. The technical changes for the foster care and adoption data elements require modifications to the screen design, corrections to how certain values are mapped to AFCARS, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface. These elements and those that received a rating factor of "3" will require additional training and supervisory oversight for the timeliness and accuracy of data entry. The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

One area that involves a change to the data entry fields on the screen is the collection of race information. (There are six elements between the foster care and adoption files for the collection of race.) The State's system has the capacity to only record up to three possible race combinations, rather than the five race categories required by AFCARS. Currently, information would not be recorded or reported for those individuals who self-identify with all of the races. The State must modify the screen so that the worker can select all of the possible five race categories.

Another area that may involve a change to the design of the system is in the collection of whether a child has been diagnosed with a disability and those diagnosed disabilities. This was also an area found needing improvement during the State's Statewide Automated Child Welfare Information System (SACWIS) Assessment Review in 2001. For AFCARS reporting purposes, the information reported should reflect chronic and/or significant diagnosed conditions that the child may have. Wisconsin's AFCARS data indicates an underreporting of this data. According to the State's data reported for the period under review, only 17% of the children in foster care were diagnosed as having a disability. The case file review supported the finding that this number is underreported. There is an issue related to how the system is designed. There are two sections of the system that case workers must complete related to the health of a child. One is on the "person management" screen. Here the system contains the AFCARS question with the same responses as in AFCARS. The second is a "Medical Profile" section that records exam dates and diagnosis, which appears to be a good section for recording the health and mental health conditions of a child. This section would allow for the recording of the actual diagnosed condition, which then can be mapped to the appropriate AFCARS category. This would provide more accurate data also because then the case worker would not have to guess which category a diagnosis belongs to. Currently, the diagnosis fields on the medical profile screens are not captured in a database table; they are only text fields. These should be stored in a table for reporting purposes. Lastly, there needs to be additional oversight by supervisors to ensure that case workers do enter the diagnosed conditions into the system.

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data in a timely manner, increase supervisory oversight, and assess the validity of the data 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 general requirements and 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 Regional Office, OIS, and the Children's Bureau 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 the Regional Office and the Children's Bureau.

The State should contact the Regional Office once it has completed its AIP. The Regional Office will then provide the State with another set of test cases. These scenarios test the technical changes made to 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 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 Regional Office. The State will receive a letter summarizing the final results of the review.

The 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 Regional Office.

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BACKGROUND

Data for the adoption and foster care analysis and reporting system (AFCARS) are required by Federal law and regulation. The data are to be collected on children in foster care and those who have been adopted under the auspices of the State child welfare agency. States that fail to meet any of the standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial compliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E State plan, and are subject to penalties¹. Additionally, States that received funding to develop, implement, and operate a statewide automated child welfare information system (SACWIS) under Federal regulations 45 CFR 1355.53 are to produce a comprehensive, effective, and efficient system to improve the program management and administration of the State plans for titles IV-B and IV-E. At a minimum, the system must provide for effective management, tracking, and reporting by providing automated procedures and processes to, among other things, meet the adoption and foster care reporting requirements through the collection, maintenance, integrity checking, and electronic transmission of the data elements specified by the AFCARS requirements.

The Children's Bureau is committed to assisting States to develop statewide child welfare information systems and to collect quality data. To this end, SACWIS and AFCARS Assessment Reviews (AAR) were developed to assure that the systems support the management of the programs under titles IV-B and IV-E and can produce accurate and reliable foster care and adoption data. AFCARS Assessment Reviews are conducted in every State, regardless of whether a State operates a SACWIS. The State's information system is assessed against the AFCARS requirements in the Federal regulation, policy issuances, and the AFCARS Technical Bulletins. The AAR evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the ACF. A second focus of the AAR 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 are also compared against a small, randomly

¹ The Administration for Children and Families is not assessing AFCARS penalties at this time (see ACYF-CB-IM-02-03) and will not take penalties until new, final AFCARS regulations are issued implementing P.L.108-145 (The Adoption Promotion Act of 2003).

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 zero (the system is not collecting the AFCARS data elements and the data are not transmitted) 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
4	All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.
3	There are data quality issues. For example: <ul style="list-style-type: none"> • The data are underreported due to inconsistent data entry. • The data are not being entered. • Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens. • There are no supervisory controls for ensuring data entry, or accurate data entry. • Incorrect data entry due to training or design issues. • Missing or incomplete data due to conversion errors.
2	The technical requirements for AFCARS reporting are not fully met. For example: <ul style="list-style-type: none"> • The State information system has the capability to collect the data, but the program logic is incorrect. • The State uses defaults for blank information.

	<ul style="list-style-type: none"> Information is coming from the wrong module or field in 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. The extraction code for the AFCARS report selects and reports incorrect data.
1	<p>An 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 information. There is 100% missing data according to the frequency report or DCU/DQU reports.
0	<p>States operating an automated information system for which they received SACWIS-level FFP were found to be using an external automated information system, or a database (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS system. In addition, there is no program code for the extraction of data from the SACWIS.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 0 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.

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, 2005 – March 31, 2006 (2006A).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, team member notes, and the States' corrected program code were assessed to make the final determination of findings. Tab A contains the findings matrices for the general requirements, the data elements, and the case file review. Tab B contains the AFCARS Improvement Plan for the general requirements and the data elements.

General Requirements

The State is in compliance with the reporting population requirements for the foster care and adoption files. However, the State was found to need improvement in the accuracy of the data for removal episodes and placement counts. Not all removal episodes were entered into the system at the time of conversion. Also, for those cases open at the time of conversion, not all placement settings were entered for the current removal episode. The State indicated that it has been working towards having this data entered. These are areas that are crucial to the evaluation of a State's child welfare practices. In order to determine if the number of children re-entering foster care is actually increasing or decreasing, a complete removal history is needed in the information system.

Data Elements

There were 32% of the data elements that received a rating factor of two; 17 (26%) foster care elements and 16 (43%) adoption elements require system and program code modifications. This may involve a screen design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface. There are 35% of the data elements that received a rating factor of three; 34 (52%) foster care and 2 (5%) adoption elements require additional training and supervisory oversight for the timeliness and accuracy of data entry. As noted above, conversion of data is also a factor in the accuracy of the data.

The State made some corrections to the program code based on the preliminary findings of the on-site review. These revisions were submitted to ACF after the on-site visit in time to be incorporated into the final findings. 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. The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

Technical Areas

- Race Information

Race information is collected in AFCARS and allows for the reporting of individuals that identify with more than one race. The collection of race data in State's information system must account for the combination of all five race categories included in AFCARS. Wisconsin's information system allows case workers to only record a maximum of three races per individual. The State must modify the data entry screen to allow for the selection of all five races. The State could modify its system by having each race listed with a selection box next to them and the worker can then select each individual race that applies for a person.

- Child Disability Information (Foster Care Elements #10 - 15)

For AFCARS reporting purposes, the information reported for these elements reflects chronic and/or significant diagnosed conditions that the child may have. A resource list of conditions to be mapped to AFCARS is listed on the Children's Bureau's web page at <http://www.acf.hhs.gov/programs/cb/systems/afcars/resources.htm>.

Wisconsin's AFCARS data indicate an underreporting of this data. The case file review revealed that 17% of the records analyzed indicated that the child did have a diagnosed disability, but the response in AFCARS indicated the child did not. There are several factors that could be contributing to the underreporting of this information. One, workers may be entering "no" when a child first enters care, then not updating the information once the child is seen by a medical professional. Second, there is an issue related to how the system is designed. There are two sections of the system that case workers must complete related to the health of a child. One is on the "person management" screen. Here the system contains the AFCARS question with the same responses as in AFCARS. There also is a "Medical Profile" section that records exam dates and diagnosis. The medical profile page documents medications, Axis I and II Diagnoses and other medical information. During the State's Statewide Automated Child Welfare Information System (SACWIS) Assessment Review in 2001, this was identified as an issue; one problem is that it is duplicative data entry. The State had responded to its SACWIS review with an action item to move the child's disability information from the person management screen to the medical profile screen, thus eliminating duplicate data entry. This approach is one recommended by the AFCARS review team. The medical profile is a good section in its system for recording the health and mental health conditions of a child. This section would allow for the recording of the actual diagnosed condition, which then can be mapped to the appropriate AFCARS category. This would provide more accurate data also because then the case worker would not have to guess which category a diagnosis belongs to. Currently, the diagnosis fields on the medical profile screens are not captured in a data base table, they are only text fields. These should be stored in a table for reporting purposes.

Lastly, there needs to be additional oversight by supervisors to ensure that case workers enter the diagnosed conditions into the system. The State must develop a longer term solution to ensure that if a child is diagnosed with any health, mental, behavioral health, or educational condition, it is entered into the information system.

- Placement Information (foster care elements #23 – 24, and #41)

Several minor changes are required for the extraction of placement information. The State must ensure that changes are made to the program code to correctly report the start date (element #23) and the placement location (element #41) of “trial home visit” once the State implements its new practice for “trial reunification.” Additionally, for children that have run away and are still on runaway status as of the end of the report period, the date the child ran away is to be reported for the date of the current living arrangement (element #23). The State also does not include moves to detention centers in the number of placements (element #24). Also, hospital stays that are for longer than a brief absence from an ongoing foster care setting are not counted as placement moves.

The State also utilizes “kinship care.” However, the State’s definition of “kinship” is broader than AFCARS use of “relatives.” For the child’s current living arrangement, the State currently maps all “kinship care” arrangements to the AFCARS value “foster home – relative.” This is incorrect. Only individuals that are related to a child by blood or marriage are to be considered relatives for AFCARS reporting purposes.

- Dates of the termination of parental rights (TPR) (foster care elements #47 – 48 and adoption elements #19 – 20)

During the site visit the State and Federal teams discussed the layout of the fields on the legal status screen for the recording of dates. There are three date fields: “hearing date/date legal status changed,” “date filed/served,” and “date order entered.” Based on discussions amongst the State team, there is some discrepancy on what the intention was for each of the date fields. Additionally, there was some confusion regarding what is to be entered in each of the fields. Also, two of the fields may be duplicative of one another. The State staff indicated they need to meet and discuss the use of these date fields and perhaps revise the fields to be more clear and to ensure that dates that are needed for various legal actions is captured. Based on decisions made by the State to address the fields, the system and program code will need to be modified.

The two fields that seem to be causing the most confusion are “hearing date/date legal status changed” and “date order entered.” The State team seemed to think these two fields are asking for the same date. However, workers may be entering the date they entered the TPR date into the system for the “date order entered” field, not the date of the hearing. The program code should use the “hearing date” for reporting the TPR elements. This should be the day the actual court hearing occurred.

- Basis for determining adoptive special needs (adoption elements #10 – 15)

There are a couple of issues with regard to the collection and reporting of this information. The State has the option “other medical diagnosed condition/at-risk,” which reflects a situation where the child is at-risk of a health/mental health condition as determined by a medical professional. This may be a misleading label as it contains both the words “at-risk” and “diagnosed,” and there is no other category for diagnosed medical, mental, physical, or emotional disability. The State maps this option to the AFCARS value “medical conditions or mental, physical or emotional

disabilities” for adoption element #10, primary basis for special need. Responses for children determined to having a special need because of being at-risk of a health or mental health condition are to be mapped to the AFCARS value “other State defined need” (AFCARS value of 5). The State needs to divide its category into an “at-risk” category and a diagnosed “medical conditions or mental, physical or emotional disabilities” category.

Also, the program code incorrectly reports elements #11 – 15 regardless of the response to element #10. It should only extract information for elements #11 – 15 if the response to element #10 is “medical conditions or mental, physical or emotional disabilities.” Also, there are some other miscoding of conditions that the State needs to correct.

- Child’s relationship to the individuals adopting him/her (adoption elements #29 – 32)

AFCARS allows this to be a multi-select field and the State is currently only capturing one relationship. The relationship that was underreported is when the adopting parents were also foster parents.

The State should note that changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. Once the above program and system corrections are made, the State must ensure that the case workers understand what needs to be recorded in the child’s case file and supervisors ensure that data are entered into the system timely and accurately.

Data Quality

As previously noted, there are several areas needing additional oversight to improve the quality of the data. This section list those areas that had significant data quality issues.

- Removal Episode Information (foster care elements #18 – 21) and Placement Count (foster care element #24)

As discussed above under the general requirements, the State has several data quality issues related to incomplete conversion of information from older information systems and the paper file to eWiSACWIS. There are removal episodes that are missing from the system, which affects the correct date of the first-ever removal episode (element #18) and the total number of removals (element #19). Also, for elements #18 and #21 the actual date of removal was earlier than what was reported to AFCARS. In general, the dates were six to seven years earlier than what was reported. This data is crucial for administrators to assess how well their programs and services are working to reduce the number of re-entries into foster care. In order to accurately assess this, the system must contain accurate information reflecting the number of times a child has been in foster care, when the episode began and entered, and the length of time between entries.

The number of placements is also incorrect. Many of the errors can be attributed to the incomplete conversion of open cases at the time of conversion. Placements that occurred prior to the county converting cases were not entered into the system. Therefore, the placement count is less than it should be for element #24, number of placements for the current removal episode.

The case file review revealed that 30% of the records analyzed had more placements for the current removal episode than what were reported to AFCARS.

There may be other elements that were incompletely converted. The State needs to review its cases and require workers to enter the above noted information and other historical information. One area the State should focus on is TPR dates. These dates are used for the second round of the Child and Family Services Reviews (CFSR) in regard to the length of time a child is freed for adoption.

- Circumstances associated with removal (foster care elements #26 – 40)

Another area that appears to be significantly underreported is the circumstances associated with removal. The case file review findings indicate there were generally more conditions present that contributed to the child's removal than what is being recorded in the system. The State needs to provide additional training and oversight to ensure all conditions, alleged or substantiated, that were present are entered into eWiSACWIS.

- Case plan goal (foster care element #43)

The results of the case file review indicated 17% of the records analyzed had errors. In general, the reviewers found a more current case plan goal than the one reported to AFCARS. The State needs to ensure that workers update the case plan goal.

CONCLUSION

Overall, the accuracy of the data needs to improve, whether it be through technical modifications or increased oversight of timely data entry. The State's data is inaccurate due to incomplete data conversion, specifically in regard to the number of removal episodes and placement settings.

There are several technical corrections that need to be made to the program code. However, in certain instances, one change will affect many elements (e.g., circumstances associated with removal and race). There are several technical changes that affect both the screen design and the extraction code. These changes will require more time and resources, but should lead to better data collection.

Changes made to the program code will inevitably result in improved data accuracy and quality. However, these changes may unmask issues related to accurate and timely data entry. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure the data are complete, the agency must require workers to enter the data timely, increase supervisory oversight, and assess the validity of the data 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 general requirements and the data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the finding(s), the task(s), the date the task is estimated 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 Regional Office, OIS, and the Children's Bureau 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 Krista Thomas in the 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 Regional Office. The 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 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 Regional Office. The State will receive a letter summarizing the final results of the review.

The 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 Regional Office.