

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES Administration for Children and Families Administration on Children, Youth and Families Children's Bureau

# Adoption and Foster Care Analysis and Reporting System (AFCARS)

# STATE GUIDE TO AN AFCARS ASSESSMENT REVIEW

3<sup>RD</sup> Edition

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# **PREFACE**

The Administration for Children and Families (ACF) is committed to the collection of quality data to be used for policy development and program management at both the State and Federal levels. The use of the Adoption and Foster Care Analysis and Reporting System (AFCARS) data is legislatively and programmatically significant for the administration and oversight of programs under titles IV-B and IV-E of the Social Security Act.

The Children's Bureau created the AFCARS Assessment Review process to assure the accuracy and reliability of the foster care and adoption data. During these reviews, the review team assesses the efficiency and effectiveness of States' data collection, extraction, and reporting processes, and provides intensive technical assistance to State staff responsible for those processes.

The Children's Bureau has also produced this *State Guide to an AFCARS Assessment Review* to provide guidance to State child welfare program and system staff regarding the AFCARS Assessment Review process. Revisions in this third edition are based on the Children's Bureau's experience from conducting AFCARS Assessment Reviews since the Guide was first issued in April 2002.

ACF welcomes comments and suggestions from those using this guide. Comments may be sent to:

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The *State Guide to an AFCARS Assessment Review* is available for download on the Children's Bureau's web site at:

http://www.acf.hhs.gov/programs/cb/systems/afcars/review.htm. The document is available in the following electronic file formats: HTML and PDF.

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# **CHAPTER I: INTRODUCTION**

#### A. OVERVIEW

States are required by Federal law and regulation to collect data on children in foster care and those who have been adopted under the auspices of the State child welfare agency. The Federal information system that collects and processes this data is known as the Adoption and Foster Care Analysis and Reporting System (AFCARS). 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 penalties<sup>1</sup>.

The Department of Health and Human Services' (HHS) Administration for Children and Families (ACF) provides national leadership and direction in planning, managing, and coordinating the administration and financing of a broad range of comprehensive and supportive programs for children and families, including child welfare programs. These programs are, in large part, carried out by State and local agencies. ACF retains responsibility to monitor and evaluate the programs to ensure that they are being operated as intended by law and regulation. This includes the assessment of the automated information systems operated by State child welfare agencies that support the programs under titles IV-B and IV-E of the Social Security Act, and the collection of relevant data.

The Children's Bureau is committed to assisting States efforts to collect quality adoption and foster care data. To this end, the AFCARS Assessment Review (AAR) was developed to assure the accuracy and reliability of the foster care and adoption data. 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 <u>accurately</u> 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 Children's Bureau has produced the *State Guide to an AFCARS Assessment Review* to provide guidance to State child welfare program and system staff regarding the AAR process. The Children's Bureau continues to evaluate and improve the review process. As such, this is the third edition of the Guide and revisions in it are based on the Children's Bureau's experience conducting AFCARS Assessment Reviews since the Guide was first issued in April 2002. The *State Guide to an AFCARS Assessment Review* (the Guide) provides information on:

- the AFCARS Assessment Review process;
- how to request an AFCARS Assessment Review;
- how to prepare for the on-site review; and
- completing the AFCARS Improvement Plan, if applicable.

<sup>&</sup>lt;sup>1</sup> 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).

Additionally, the Guide ensures that the same criteria are applied equally to all States, that Federal AFCARS Assessment Reviews are conducted in a consistent manner, and that they are well-documented and substantiated.

#### **B. AUDIENCE**

The Guide is intended to assist State agency staff to prepare, plan, and participate in the AFCARS Assessment Review. State agency staff that are involved with the assessment review include both systems and program staff. Additionally, individuals that are representing other divisions or agencies during the AAR may also find the information in this Guide helpful.

# C. BACKGROUND

1. Adoption and Foster Care Analysis and Reporting System (AFCARS)

AFCARS was created, in part, due to concerns raised about the lack of national information available on children in foster care, their families, the types of foster care settings, and adopted children. In 1986, Congress amended title IV-E of the Social Security Act (the Act) by adding section 479, which requires the Federal government to institute a foster care and adoption data collection system. In response to the law, requirements for States to report adoption and foster care data to a Federal system were implemented under Federal regulations at 45 CFR 1355.40. The AFCARS collects case level information on all children in foster care for whom the State child welfare agency has responsibility for placement, care, or supervision and on children who are adopted under the auspices of the State's public child welfare agency.

ACF uses AFCARS data for a number of reasons, including:

- responding to Congressional requests for current data on children in foster care or those who have been adopted;
- responding to questions and requests from other Federal departments and agencies, including the General Accounting Office (GAO), the Office of Management and Budget (OMB), the DHHS Office of Inspector General (OIG), national advocacy organizations, States, and other interested organizations;
- short and long-term budget projections;
- trend analyses and short and long-term planning;
- targeting areas for greater or potential technical assistance efforts, for discretionary service grants, research and evaluation, and regulatory change; and
- determining and assessing outcomes for children and families.

Additionally, the AFCARS data are used specifically in the:

- Adoption Incentives Program;
- Child Welfare Outcomes Report;
- Child and Family Services Reviews (CFSR);
- Title IV-E Eligibility Reviews; and
- Allotment of funds in the Chafee Foster Care Independence Program (CFCIP).

States are required to submit AFCARS data semi-annually to ACF in accordance with 45 CFR 1355.40<sup>2</sup>. These data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR 1355. These edit checks are only able to determine substantial compliance 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.

As such, these edit checks are an important first step to ensuring the collection of quality data. However, substantial compliance with these edit checks neither informs ACF as to whether or not a State's information system satisfies all Federal regulatory requirements, nor demonstrates the State is submitting accurate and reliable data to ACF. This explains why in the past a State may have been penalty free yet still needed to improve its AFCARS data for accuracy, reliability, and quality. For example, the edit checks cannot assess the AFCARS data files to determine whether the State submitted data on the correct foster care population for the correct time period required by the regulations. Also, the edit checks cannot determine if the State has correctly collected the necessary data and mapped it to the appropriate AFCARS values.

# 2. Statewide Automated Child Welfare Information System (SACWIS)

In December 1993, ACF published regulations at 45 CFR 1355.50-56 implementing section 474(a)(3)(C) and (D) (42 U.S.C. 674(a)(3)(C) and (D)) of title IV-E of the Act. Section 474(a)(3)(C) (now revised) provided enhanced Federal financial participation (FFP) at the 75 percent match rate for Federal fiscal years (FFY) 1994 – 1996<sup>3</sup> for planning, design, development, or installation of SACWIS to support the States' programs under titles IV-B and IV-E of the Act. Additionally, section 474(c) (42 USC 674(c)) of the Act indicates that States do not have to allocate expenditures between title IV-E and non-title IV-E clients for SACWIS-related costs.

The Federal regulations at 45 CFR 1355.53 provide the conditions for approval of funding for a SACWIS. As a condition of funding, the SACWIS must be designed, developed (or an existing system enhanced), and when implemented, 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 mandated under section 479(b) of the Act and 45 CFR 1355.40. As a result, States that receive FFP to develop a SACWIS must not collect and maintain the AFCARS data in a separate automated information system after the SACWIS is operational. A State found out of compliance with 45 CFR 1355.53(b)(1) by the use, or continued use, of an external system in

<sup>&</sup>lt;sup>2</sup> AFCARS report periods are based on the Federal fiscal year. Report periods are October 1 – March 31 (data are due by May 15) and April 1 – September 30 (data are due by November 14).

<sup>&</sup>lt;sup>3</sup> The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) extended enhanced funding through FFY 1997.

addition to the use of SACWIS can lead to a final finding of non-compliance with the SACWIS functional requirements, and may result in a disallowance of some of the Federal incentive funds used by the State to develop its SACWIS.

Since SACWIS is intended to support a variety of child welfare programmatic purposes, it should be considered to serve as the official case file and as such, contain all the same type of information that would have been generated by the agency and kept in the paper record. This does not mean that documents that are generated by agencies outside of the child welfare agency must be stored in the SACWIS. These documents will be part of a hard copy record. However, information that is entered over time by caseworkers should be maintained in the system and not overwritten by new occurrences. This allows the State to evaluate the status of a case at any point in time based on information that was known at that time.

# D. INFORMATION SYSTEM REVIEWS

The Children's Bureau conducts separate assessment reviews to evaluate the development, implementation, and operations of SACWIS and AFCARS.

The <u>SACWIS Assessment Review (SAR)</u>, conducted by the Children's Bureau's Division of State Systems (DSS), focuses solely on operational statewide automated child welfare systems for which States have received SACWIS-level FFP. DSS assesses a State agency's SACWIS for its compliance with Federal statutory and regulatory requirements, as well as functional, technical, and operational specifications approved in a State's Advance Planning Document (APD).

As part of this review, DSS identifies whether or not the State is using the SACWIS to collect and submit the AFCARS data. Once a State has an operational automated system identified as a SACWIS, or its case management module is operational, ACF expects that the State's system be used to collect and submit the AFCARS data. If an AFCARS data file has not been submitted by the time of the review, DSS assesses the State's system's capability to submit it. Additionally, DSS transmits any on-site State questions and findings regarding AFCARS to the Children's Bureau's AFCARS project leader who will follow up with the State.

The AFCARS Assessment Review (AAR) is a comprehensive evaluation of the State's automated information system which collects, extracts, and submits AFCARS data, and assesses the accuracy of data collected in accordance with the definitions of the data elements. This is done by verifying the State information system's capability to collect, extract, and transmit the AFCARS data accurately to ACF. Additionally, the AAR provides assurance to the Children's Bureau that the data being collected are reliable and consistent across all States. The AAR process goes beyond the edit checks that must be met in order to pass the AFCARS compliance error standards. The AAR assesses the extent to which a State is meeting all of the AFCARS requirements and the quality of its data.

AFCARS Assessment Reviews will be conducted in every State, regardless of whether a State operates a SACWIS. Also, an AAR will be conducted on those States that participated in the pilot AFCARS reviews. For States with an operational SACWIS, an AAR may occur either

prior to or following a SAR. It is possible for AFCARS and SACWIS reviews to be conducted concurrently. States that have not developed a SACWIS, and are not planning to do so, are considered ready for an AFCARS Assessment Review. To be considered ready for an AAR, States that have developed, or have not completed the full implementation of, a SACWIS must be:

- operating all modules related to the collection of AFCARS data;
- operating these components statewide; and,
- collecting, extracting, and submitting both the foster care and the adoption files from the SACWIS.

The Children's Bureau's SACWIS and AFCARS review teams share the results and documentation of their reviews with each other as well as with the CFSR teams.

#### E. AUTHORITY

The statutory basis for AFCARS and SACWIS is the Social Security Act (the Act). The following lists the specific requirements that govern information systems, data collection, and ACF's review of the AFCARS requirements:

- Section 422(b)(10)(B)(i) of the Act: Requires States to have an operating "statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care."
- Sections 471(a)(6) and 476(a) of the Act: Establishes ACF's responsibility to verify the correctness and reliability of State reports and to exercise oversight of foster care and adoption data.
- Section 479 of the Act: Requires HHS to implement a national data collection system to collect information with respect to the foster care and adoption population.
- Section 474(a)(3)(C) and (D) of the Act: Provides enhanced Federal financial participation (FFP) to States for the planning, design, development, or installation of statewide mechanized data collection and information retrieval systems that, among other things, support the collection of foster care and adoption data under section 479 of the Act and lead to a more efficient, economical, and effective administration of the programs under a state plan approved under titles IV-B and IV-E.
- 45 CFR Parts 1355, 1356 and 1357: Sets forth the requirements implementing programs under titles IV-B and IV-E of the Act.
- 45 CFR Parts 1355.40 and Appendices to 45 CFR 1355: Sets forth the requirements for the AFCARS data system.
- 45 CFR 1355.50-57: Sets forth the requirements for developing and implementing a SACWIS.

# F. STRUCTURE OF THE GUIDE

The Guide is organized into six chapters. Chapters I through III provide a general overview and background of the AAR and the review teams. Chapters IV and V describe the activities involved in an AFCARS Assessment Review. Chapter VI addresses the activities that occur after the site visit and provides information on the AFCARS improvement plan.

Information regarding AFCARS and SACWIS can be found on The Federal and State Reporting Systems page at http://www.acf.hhs.gov/programs/cb/systems/index.htm. Information about other program-related guidance, is available from the Children's Bureau web page at http://acf.dhhs.gov/programs/cb.

This *Guide* may undergo periodic updates and/or revisions. To ensure you have the latest version of the *Guide*, check the Children's Bureau's AFCARS web page at http://www.acf.hhs.gov/programs/cb/systems/afcars/review.htm once an AFCARS Assessment Review has been scheduled.

# CHAPTER II: OVERVIEW OF AFCARS ASSESSMENT REVIEWS

#### A. INTRODUCTION

The AFCARS Assessment Reviews (AAR) are conducted by the Children's Bureau, the ACF Office of Information Services (OIS), and the ACF Regional Offices. They incorporate an understanding of a State's child welfare policies and practices with an analysis of the information system designed to collect information and the technical documentation used to extract and report the AFCARS data to ACF.

The AFCARS Assessment Review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The AAR also ascertains the extent to which a State meets <u>all</u> of the AFCARS requirements and the quality of its data. Additionally, while the AAR 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 AAR, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

#### **B. SUMMARY OF AAR PHASES**

The AFCARS Assessment Review process consists of five components. They are:

- AFCARS Assessment Review Initiation Phase
- Pre-site Visit Phase
- On-site Visit Phase
- Post-site Visit Phase
- AFCARS Improvement Phase

Exhibit 1 outlines the major activities that occur in each phase. The remainder of this section provides a high level overview of each phase.

#### 1. AAR Initiation Phase

The purpose of this phase is to develop the AAR schedule. The initial step in the process is to identify States that are eligible for an AAR. Although this is a Federal task, and not covered in detail in this Guide, States may request an AAR. Guidance is provided in section E of this chapter on how to request an AAR. Once States have been identified for an AAR, they are contacted in order to finalize scheduling of the AAR.

# 2. Pre-site Visit Phase

This phase includes activities that are necessary to prepare for the on-site review. It involves the exchange of documentation between the Federal and State team, and a preliminary analysis of the State's system documentation, by Federal staff, in order to develop initial findings and identify those areas that require emphasis during the on-site review. During this phase the State

enters a set of test cases and extracts the test data for transmission to ACF. The pre-review phase begins no later then ten weeks prior to the scheduled site visit. Chapter IV further addresses the procedures for this phase.

#### 3. On-site Visit Phase

The on-site review is conducted over five business days. During this time the Federal team reviews its preliminary findings with the State team, views the demonstration of the State's system using a sample case scenario, and reviews paper case files. At the end of the AFCARS Assessment Review, an exit briefing is held with the State review team and management officials. During the exit briefing a summary of the major compliant and non-compliant findings is presented. In addition to the briefing, draft findings documents are left with the State team in order to allow the State to begin making necessary changes, if any, to the system. Chapter V further addresses the procedures for this phase.

# 4. Post-site Visit Phase

The post-review phase involves a final assessment of the information gathered during the on-site review, including any corrections the State makes to its extraction code within 45 days after the site visit. This phase should last no more then 90 business days from the end of the on-site visit. A report is written noting the major findings from the assessment review, with copies attached of the detailed findings. This report is signed by the Associate Commissioner of the Children's Bureau and mailed to the State agency. Chapter VI further addresses the procedures for this phase.

# 5. AFCARS Improvement Phase

In the event there are areas the State must correct in order to meet the requirements established in the AFCARS Federal regulation, the State will start the AFCARS Improvement Phase. This phase begins once the State receives the report and improvement plan and ends when the State has made all system changes and the quality of the data has improved and remains consistent. The elements/general requirements that receive a rating factor of "3" or lower will make up the action items in the plan. Chapter VII further addresses the procedures for this phase.

Exhibit 1: AFCARS Assessment Review Process

PHASE	AAR Initiation	Pre-site Visit	On-site Visit	Post-Site Visit	AFCARS Improvement
Activity	Federal Identification of States for AAR  State Requests an AAR  Notify State of AAR  Finalize AAR Schedule for FFY	Conduct Conference Call(s)  Schedule Site Visit  Exchange Documentation  Enter Test Cases  Select Sample for Case File Review  Identify Case Files  Finalize Arrangements for On-site Review	Conduct Entrance Conference  System Demonstration Using a Sample Case Scenario  Review Case Files  Review AFCARS Population and Data Element Requirements  Conduct Technical Review  Document Review Findings  Conduct Exit Conference	Final Review and Findings  Prepare and Send Letter and Final Report to State Agency  State drafts Timeline for Corrections	State Makes Corrections to Information System/ Screens and Program Code  Implement Data Quality Improvement Measures
Timeframe		10 Weeks Prior to the On-site Review Phase	5 Business Days	90 Business Days following the On-site Review	2 years from final report date

# C. REQUIREMENTS SUBJECT TO REVIEW

States' AFCARS are reviewed against the requirements in 45 CFR 1355.40, the appendices to 45 CFR 1355, AFCARS policy, and Technical Bulletins. There are two major areas that are assessed during an AFCARS Assessment Review. They are: 1) the AFCARS general requirements, and 2) the data elements. The general requirements include the population to be reported to AFCARS and the technical requirements for constructing a data file. During an AAR, each of the 103 data elements and each of the 28 AFCARS general requirements will be assessed on the basis of the requirements in the regulation and other policy and technical issuances. Information for each item that is collected from each of the components of the AAR is combined and a rating factor is assigned. The general information requirements will be evaluated and rated separately from the data elements. Chapter V provides more detail on the evaluation process. Additional information is also available in the following appendices:

- □ Appendix A lists the AFCARS policy issuances and technical bulletins.
- □ Appendix B lists the AFCARS general requirements.
- □ Appendix C lists the AFCARS data elements.

#### D. RATING FACTORS

A scale of 1 (does not meet AFCARS standards) to 4 (fully meets AFCARS standards) is used to assign a rating factor for each of the AFCARS general requirements and data elements. Exhibit 2 lists the rating factors and definitions. The State is not given an overall numerical rating based on the AFCARS Assessment Review.

A new category has been added to the rating factors. This category applies to States that have received SACWIS-level FFP. If during an AAR, the Federal team finds that the State's AFCARS data are not collected or extracted from a SACWIS, the appropriate area will be given a rating factor of "0." The State's AAR will be considered incomplete in regard to the area not collected in the SACWIS. The items that are collected in the system will be evaluated based on the AFCARS requirements. For instance, if the foster care elements are collected in the SACWIS but the adoption elements are not, the foster care elements will be given the appropriate rating factor between one and four, and the each adoption element will be given a zero. Once the State completes the tasks associated with enhancing the SACWIS to collect and report the AFCARS data, the Federal team will complete the AFCARS Assessment Review. Depending on the degree of changes needed, this may require a second on-site review.

Since an AAR is conducted on those States that are collecting, extracting, and submitting both the foster care and the adoption files from the SACWIS, the Children's Bureau expects that a rating factor of "0" will be rare. If it is found during a SACWIS Assessment Review that the State is not collecting and reporting its AFCARS data from the system in compliance with 45 CFR 1355.53(b)(1), it is the Children's Bureau's expectation that this requirement be implemented immediately and given the State's highest priority. As noted in section C.2 of

Chapter I, this may result in a disallowance of some of the Federal incentive funds used by the State to develop its SACWIS.

**Exhibit 2: Rating Factors** 

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:
	• 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:
	The State information system has the capability to collect the
	data, but the program logic is incorrect.
	The State uses defaults for blank information.
	• 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.
	<ul> <li>The extraction code for the AFCARS report selects and reports</li> </ul>
	incorrect data.
1	An AFCARS requirement(s) has not been implemented in the
_	information system. For example:
	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	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.

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

It is possible that the problem with the data element and data are due to both system issues and case worker data entry issues. In this case, the element is given a "2" to denote the need for the system program source code or logic to first be modified. Once the corrections are made to the system, then the data needs to be re-analyzed by ACF. If problems related to case worker training or data entry still exist, then a "3" is assigned to the requirement. A finding of fully meeting the AFCARS standard (a factor of "4") is not given to the element until all system issues and/or data quality issues have been addressed.

A State that has been determined to not fully satisfy the AFCARS standards (a rating factor of 3 or lower) must make the corrections identified by the review team to improve data quality. Action steps are identified in the AIP and included in the final report. The State is required to make the changes to the information system, extraction program, and/or data entry in order to fully satisfy the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State should implement the action items as soon as possible as a way to improve the quality of its data.

To the extent that the State takes action to correct its collection and extraction of AFCARS data, it is possible that a resulting improvement will bring to light weaknesses masked by prior problems. For example, a State's program logic may be written to ensure there are no missing data by mapping missing information to a known AFCARS value (i.e., setting defaults). Once this is corrected the State needs to ensure that workers are actually entering the required information.

States found not to be in compliance during the AFCARS Assessment Review do not incur penalties. We expect the State to use the AIP as a way to formalize technical assistance needs, action steps, and improve the quality of its data.

# E. AAR INITIATION PHASE

# 1. Federal Selection Process

As noted previously, this phase is primarily a Federal task. It is included in this Guide in order to assist States to know when they may be selected for an AAR. In order to determine a State's readiness for an AAR, the Children's Bureau determines whether a State has developed and is operating a SACWIS. States that have not developed a SACWIS, and are not planning to do so, are considered ready for an AFCARS Assessment Review.

To be considered ready for an AFCARS Assessment Review, States that have developed, but not completed the implementation of, a SACWIS, must be:

- operating all modules related to the collection of AFCARS data;
- operating these components statewide; and,

• collecting, extracting, and submitting both the foster care and the adoption files from the SACWIS.

The priority for conducting AFCARS Assessment Reviews is in those States that have either completed the on-site process of a SACWIS Assessment Review or will not develop a SACWIS. When determining the order in which States are reviewed, the following additional factors are taken into consideration:

- Is the SACWIS-level funded automated child welfare information system being transferred to another State?
- Is the State scheduled for a CFSR within two years of the current Federal fiscal year?
- Has the State requested an AFCARS Assessment Review?
- Were AFCARS-related issues identified during a CFSR, SACWIS Assessment Review, or title IV-E review?
- Have AFCARS-related issues been identified by other sources, such as the Office of Management and Budget (OMB), the General Accounting Office (GAO), or the Office of the Inspector General (OIG)?
- What is the quality of the State's data?

A State may contact its ACF Regional Office to inquire when it may be scheduled for an AAR.

2. State Request for an AFCARS Assessment Review

States may request an AFCARS Assessment Review. This section outlines the steps for a State to request an AFCARS Assessment Review.

- □ The State Child Welfare Director must submit a written request by July prior to the Federal fiscal year in which the State is asking for the AAR. The letter should be submitted to the State's Federal ACF Regional Office stating the reason(s) for the request.
- □ The letter should respond to the selection factors listed above, suggest preliminary dates for the AAR, and identify a State contact person for coordinating the review.
- □ For States that are implementing a SACWIS, the request should address the developmental and/or operational status of the State's automated system, whether an AFCARS data file has been submitted from the system, and how and when the State's data conversion process occurred.
- □ ACF will respond to a State's request for an AFCARS Assessment Review within 30 business days.

# **CHAPTER III: THE REVIEW TEAMS**

#### A. INTRODUCTION

This chapter identifies the individuals that must be involved in the AFCARS Assessment Review. It includes information on who is responsible for various tasks in each phase of the review, and who should be present for each of the on-site segments. In general, the AFCARS review team is composed of two groups, the State team and the Federal team. Membership on the review team involves a significant commitment of time and effort. Both State and Federal team members are responsible for the following activities:

- participation in conference calls scheduled prior to the review;
- implementation of all assigned activities associated with the review;
- participation in review activities during the on-site review; and
- participation in entrance and exit conferences.

# **B. COMPOSITION OF THE REVIEW TEAMS**

At a minimum, the following individuals should be considered members of the <u>State</u> team:

- Child Welfare Administrator:
- AFCARS Project Manager (or a person responsible for AFCARS);
- SACWIS Project Manager (or a person responsible for SACWIS), for those States implementing a SACWIS;
- Adoption Program Specialist;
- Foster Care Program Specialist;
- Policy Director;
- Child and Family Services Review Coordinator;
- System Analyst/Programmer familiar with AFCARS data extraction routines;
- Field staff; and
- Contractor Representative, if applicable.

There is not a designated limit on the number of individuals that can be members of the State review team. The State team may include staff other than those listed above. For instance, the agency may want to include members from their eligibility or financial units during the discussion of the foster care and adoption elements, or sources of income. Section C below provides additional guidance on who should participate in each segment of the review, and expectations for team members.

At a minimum, the Federal team will consist of:

- Children's Bureau Representative(s);
- Office of Information Services (OIS) Representative(s);
- ACF Regional Child Welfare Program Specialist;
- Fiscal Specialist; and

• ACF Regional Information Technology Specialist (if applicable)

The Federal team may include other staff than those listed above, either program or systems staff. Contract staff from OIS may also be part of the review team.

# C. ROLES AND RESPONSIBILITIES OF TEAM MEMBERS

Exhibit 3 provides summary information on the role and responsibilities of the State and Federal team members' responsibilities.

#### 1. State Team

This section gives additional guidance on who should participate in the AAR and their responsibilities. State team members should be identified as soon as an AAR has been agreed upon by ACF and the State agency. Also, the agency should designate a State Review Team Coordinator.

• Administrators (such as the Child Welfare Administrator, Commissioner, Division Directors)

Administrators are not expected to participate in the entire review process, but are considered an integral component of the State team. Administrators should be informed of the AAR and should attend the entrance and exit conferences.

• The State Review Team Coordinator

The State review team coordinator serves as the liaison with the Federal review team coordinator to plan the AAR and to ensure follow-through on the pre-site visit activities. The coordinator disseminates information internally on the nature and scope of the AAR in order to prepare program and data processing staff who participate in the on-site review. A checklist of activities that may be used to prepare for the AAR is included in Appendix E. This individual will continue to be the liaison between the State and the Federal review team during the post-site review phase, and if applicable, the AFCARS Improvement Phase.

Foster Care and Adoption Managers

Program staff representing the State's foster care and adoption units are integral members of the State AFCARS review team. In order to assess the State's collection and reporting of the AFCARS data, the State's child welfare policies and practices need to be taken into account. Additionally, since it is often the program staff who are using and explaining the data, having them participate in the AAR provides an opportunity for them to further examine the quality of the data.

• SACWIS Project Manager

The SACWIS Project Manager should participate in all components of the onsite review process. Since part of the analysis of a State's AFCARS relates to how data are recorded in

the SACWIS, it is important that the SACWIS Project Manager be involved, if necessary, regarding potential changes to the SACWIS. It may also be necessary for the SACWIS Project Manager to explain how and why certain components were developed in the SACWIS.

# Field Staff

Field staff (front line case workers, supervisors, regional staff, etc.) should participate in the case file review. The State may decide the level and number of staff that participate in the case file review. See chapters IV and V for more information on the case file review process. The State is not limited to having field staff present only during the case file review. If the State agency has "super users," i.e., primary contacts for providing assistance and information on the system, etc., in its field offices, then the agency may want to consider adding these individuals to the State team. The agency may include them for the full week or for selected segments of the review.

#### Technical Staff

Technical staff representing the State's child welfare system are part of the core review team. This also includes any staff under contract to the State agency to develop or operate the information system. The technical team is primarily responsible for describing how the system collects and extracts the AFCARS data. The person primarily responsible for developing the program code and writing the routines for AFCARS data extraction must be present during the week of the review.

# Additional Staff

The State may choose to bring in representatives from other agencies that provide data to the State for its AFCARS reporting. Their participation may be useful during the general discussion of the types of information that are needed for AFCARS or for the data element review. Examples include representatives from juvenile justice, the courts, mental health, contract providers, or Tribes. Additionally, the State may want to include training and fiscal staff.

# 2. Federal Team

A Federal review team coordinator will be identified as soon as the State has been scheduled for an AFCARS Assessment Review. The Federal review team coordinator serves as the liaison with the State review team coordinator to plan the AAR and to ensure that pre-site visit activities are completed in a timely manner. The Federal review team coordinator is responsible for finalizing arrangements for the site visit, clarifying expectations and answering questions about the AAR process, and ensuring the State has submitted all the needed documents on time to ACF.

Exhibit 3: Review Team Roles and Responsibilities

Title	Roles/Responsibilities
State AAR Team	• Represent areas of the State's child welfare program under review.
	• Provide expertise in team members' respective areas, including foster
	care, adoption, program policy, and information technology.
	Attend on-site sessions.
State AAR Team	• Serve as the liaison with the Federal review team coordinator through all
Coordinator	phases of the AFCARS Assessment Review.
	Provide a list of State team members to Federal review team
	coordinator.
	• Ensure the timely delivery of materials to all team members.
	• Ensure that State information system documentation is sent to ACF
	Regional and Central Offices staff on time.
	• Handle logistics for calls, schedules, and documentation dissemination.
	• Ensure that the test cases are entered into the State's information system.
	• Ensure that paper case files are pulled and sent to the office where the
	review will be held.
	• Schedule State review team members for on-site review.
	Reserve a room large enough to accommodate the State and Federal
	review teams during the site visit.
	• Reserve additional space for reviewing the case files, if necessary.
	• Ensure access to the State information system for the entire week.
	• Ensure that State team members attend the on-site review meetings.
Federal AAR Team	• Conduct site visit.
	• Produce findings.
	Provide applicable technical assistance.
	Produce and review draft final reports.
Federal AAR Team	• Schedule pre-site visit conference calls.
Coordinator	• Finalize due dates for documentation exchange, and ensure documents
	are received by the ACF Regional and Central Offices.
	• Finalize arrangements for the on-site review with the State review team
	coordinator.
	• Follow up with team members on their assignments.
	• Send letter to State confirming the dates of the site visit, names,
	positions, and telephone numbers of the Federal team members.
Federal Technical	• Review State's system documentation.
Lead	• Assume lead responsibility in technical matters related to the review.
	Run frequency and case file review reports on raw data.

# CHAPTER IV: THE PRE-SITE VISIT PHASE

#### A. INTRODUCTION

This chapter outlines the activities State agency staff need to complete in order to prepare for the on-site phase of the AAR. During this phase the State should identify those areas it wants to specifically address during the site visit. The State agency should view the AFCARS Assessment Review as an opportunity to examine its foster care and adoption data concerns completely and take advantage of the intensive technical assistance available from ACF. The State may also want to review its CFSR data profile to identify any areas in which it may want to request assistance from the Federal AFCARS review team.

The pre-site visit phase involves the following activities:

- documentation exchange;
- case scenario entry;
- case file review preparation; and
- finalize the on-site agenda.

# **B. OVERVIEW OF THE PRE-SITE VISIT ACTIVITIES**

The pre-site visit phase officially starts when a State is notified of its AFCARS Assessment Review. Ideally, a State will know by July that it will have its AFCARS Assessment Review the next Federal fiscal year. A State will not have less then three months notice of an AFCARS Assessment Review.

Once the dates are selected for the AFCARS Assessment Review, a confirmation letter will be sent to the State. This letter contains the following information:

- □ The date of the on-site review.
- ☐ The date the State's system documents are due to ACF.
- ☐ The date the case file sample and test cases will be sent to the State.
- ☐ The date the test case extraction is due to ACF.
- □ The contact information for the Federal review coordinator and members of the Federal team.

# C. DOCUMENTATION EXCHANGE

This section describes the documents that are exchanged between the State and ACF. It is not ACF's expectation that the State create new system documentation for the review team to analyze. The State should submit its technical documentation in its current format. Exhibit 4 contains examples of the types of documents to submit. The documentation should reflect the

options available to the case workers for each AFCARS data element, and the State value for that option.

The Federal review team needs a "fixed" set of documentation in order to conduct a quality review for the State. The State should submit its most current version of the extraction program code and reference tables. Any modifications made to the screens or the program code as it relates to AFCARS, after the time ACF receives the State's documentation, will be included in the post-site visit review.

The State's system documentation may be submitted earlier then the due dates. States should begin consolidating the system documentation as soon as possible and maintain an up-to-date library of system documentation. This is helpful for those States that are developing a SACWIS and to those preparing for the SACWIS Assessment Review.

#### Procedure

- □ By the due dates, submit copies of the documentation to ACF. The documentation can be submitted in hard-copy form or electronically.
  - ☐ If it is e-mailed, send to the ACF Regional Office and the Children's Bureau staff.
  - ☐ If sent as a hard-copy in lieu of electronic copies of the documentation, then two copies of the documentation should be sent to the ACF Regional Office and two copies to the Federal review team coordinator.
  - ☐ If electronic copies of the documents are sent on a compact disk, this must be sent via overnight mail to the Children's Bureau<sup>4</sup>. Do not send zip disks.
- □ Contact the ACF Technical Lead for questions concerning the technical documentation.

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<sup>&</sup>lt;sup>4</sup> Mail to Government Offices in Washington, DC is subject to sterilization process that will melt any electronic mediums sent in the mail.

#### Exhibit 4: State Documentation List

- <u>Programming Logic (Source Code)</u>: The programming logic that derives and extracts each AFCARS element from the State's System.
- <u>Data Element Dictionary:</u> A data dictionary or similar documentation will provide the Federal team with definitions and representations of the State's values for AFCARS related fields. This document should be complete and reflective of options available to the case worker to select. This documentation may be supplemented by code/lookup tables that will enable the team to understand elements referenced in the source code or mapping forms. For example, placement code 257 = relative foster care, licensed.
- Relevant Reference Tables and Fields: Specific fields and tables from which the data are pulled.
- <u>Database Structures:</u> Tables referenced in mapping documentation.
- <u>Extraction Routine Notes:</u> A logical description, or the steps in pseudo code, of how records are selected for inclusion in the foster care and adoption submission.
- Data Entry Screens: Printouts of screens relevant to AFCARS data elements.
- <u>Change Request Orders:</u> Changes that the State has planned that impact the AFCARS data elements that are not included in the current version of the extraction program code.
- <u>Interface Structure:</u> Information on interfaces to non-SACWIS systems that contribute data to the AFCARS submission.
- Organizational Charts: Charts of the program and information technology divisions.

Note: It is crucial that the documentation be submitted to ACF on time. Delays in the submission of the documents affect the Federal team's preparedness for the on-site review and may result in an incomplete on-site evaluation.

#### D. TEST CASES

The use of test cases is a way to assess the State's collection and extraction of the AFCARS data. This process is another way for the Federal team to gain a better view of the State's policies, practices, training, and extraction routine. The records that are created by the test cases are extracted from the State's data system and compared with an established answer key. This information in conjunction with the analysis of the extraction program code provides, and the other components of the AAR, the Federal team with a comprehensive view of the State's system.

The intent of the test cases is to validate the State's information system for accuracy. As such, the Federal review team coordinator may answer <u>some</u> questions the State has on the cases, but most will not be answered in the interest of determining objectively the State's AFCARS capability. Appendix G contains the instructions for entering the case scenarios.

# Procedure

- □ The Federal review coordinator e-mails the test cases to the State review coordinator by the established due date. The State will receive the test cases no later than six weeks prior to the on-site phase.
- □ The State review coordinator will identify a staff member who is familiar with the system and/or case practice to enter the cases. Approximately 40 working hours should be allotted for this task.
- □ A training or test environment may be used to enter the test cases. This should mirror the production system. The State needs to ensure that the method used to enter the data will also allow for the entry/extraction of the financial data elements.
- Once the test cases are entered into the system, the State review team coordinator will contact the ACF Technical Lead for instructions on transmitting the test file via Connect:Direct. The file must be submitted by the established due date.

# E. CASE FILE REVIEW PREPARATION

Another tool used in the AFCARS Assessment Review process is the case file review. A sample of 80 foster care records and 30 adoption records is pulled for the AFCARS reporting period under review. The AFCARS data submitted to ACF on each record is then compared to information found in the paper case file during the onsite review. The process involves all members of the State and Federal teams, technical and program. The State is encouraged to incorporate field staff, including supervisors, staff from training units, etc., as part of the State team for the purpose of reviewing cases. See Chapter III for additional information on who the State may want to include on the case file review team. A preliminary analysis of the findings is conducted during the onsite review and shared with the State. A further discussion of the onsite process can be found in Chapter V.

ACF has found that while there may be challenges to identifying the information in the paper file, the process provides very valuable information to the review teams. The case file review is also the only means for the Federal team to assess the accuracy and the level of completeness of the State's conversion process from a paper or legacy system to its new information system. The findings often provide additional supplemental information that increases the Federal teams understanding of the data reported to AFCARS. Also, this process allows the review team to assess how well records are being kept up-to-date, how accurate the data are in AFCARS, and usage of the State's information system. Oftentimes, this process does not identify new problems, but usually confirms findings from the other components of the AAR.

While ACF recognizes that current data may no longer be in the paper files but will, instead, be in the automated information system, there are some documents that may not be part of the State's information system, such as medical reports, court reports, home studies, etc. These documents oftentimes provide a significant amount of the information for the case file reviewers. It is important that the State have available the complete case file; oftentimes relevant information is found in a sibling's folder instead of the folder on the child under review. Intake documentation can also be a valuable source of information.

Since the case file review is the only means to assess conversion, the cases selected for the review will primarily be those in which the most recent removal date, or the first removal date, precedes the date the State's system went operational. If the State phased in its operational status, then the sample may reflect these dates.

Depending on the length of time since the State converted to a new information system, this portion of the AAR may be modified to accommodate the State's situation, such as how to handle placement information. During the initial conference call, ACF and the State will discuss and plan for the case file review and make adjustments as necessary.

#### Procedure

Once the State review team coordinator receives the list of encrypted or sequential case record numbers from the Federal review team coordinator, he/she should:

- □ Create a list to cross-reference the encrypted/sequential record number with the actual case record number.
- □ Arrange for the case files to be delivered to the State office by the first day of the on-site review.
- □ Ensure that case records are as complete and up-to-date as possible, and include any files maintained separately, e.g., child protective services files, provider files, and eligibility files. All case records should include:
  - court orders;
  - placement history;
  - caretaker (person child was removed from) information;

- medical history;
- biological parent file for the adoption records; and
- foster care records on children adopted (if the relevant AFCARS information cannot be found in the child's adoptive record).

**Note**: Sealed adoption records. If a sufficient number of cases cannot be identified for review due to their having been sealed, then the State will have to petition the court to open the records prior to the on-site review.

□ Identify and schedule staff to participate in the case file review. It is recommended that the State have field workers, supervisors, and/or regional administrators participate in this part of the review.

#### F. THE ON-SITE AGENDA

Appendix H contains a sample agenda for the on-site review. Any changes to the overall agenda must be discussed with, and given to, the Federal review team coordinator. The State review team coordinator should provide the Federal review team coordinator with a list of the names and titles of the State staff participating in each segment of the AAR.

# **G. SITE LOGISTICS**

The on-site review activities are conducted in one location. The State capitol is generally the designated location since it is the location of the State agency central office/administrative staff, but another site may be mutually agreed upon. It is preferable to conduct the meetings in one large room to allow enough space for the size of the team and materials needed for the AAR. A separate room can be added on the day of the case file review, as this activity will include additional staff and the case files. The room used for the case file review should be secure to protect the confidentiality of the case records.

# **CHAPTER V: THE ON-SITE REVIEW PHASE**

#### A. INTRODUCTION

The on-site review occurs over a period of five consecutive working days. During this week, there is an entrance and exit conference with management staff, the entry of a case scenario, a discussion of the State's provision of child welfare services and policies, a review of the technical documentation used to extract the AFCARS data, and a review of case files. During the exit briefing a summary of the major findings is presented. Draft documents of the team's preliminary on-site findings are left with the State team in order to allow them to begin making changes, if any, to the information system and the AFCARS reporting process. This also allows the team time to identify priority areas and a work plan.

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 <u>accurately</u> to the Children's Bureau. 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.

There are two major areas that are assessed during an AAR. They are: 1) the AFCARS general requirements, and 2) 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. During an AFCARS Assessment Review, each of the 103 data elements and each of the 28 AFCARS general requirements are assessed on the basis of the requirements in the regulation and other policy and technical issuances. Information that is collected from each of the components of the AAR is combined and the item is assigned a rating factor. The general requirements are evaluated and rated separately from the data elements.

#### **B. ON-SITE LOGISTICS**

During the week of the AAR, work hours will generally be between 8:30 a.m and 5:30 p.m. The agenda in Appendix H gives a general timeframe for each day. The review team will require access to the State's information system all week (primarily on Monday, Wednesday and Friday), as well as the capability to project in the meeting room.

For the case file review, it is necessary for the reviewers to be in one room. If this is not possible, a smaller second room can be designated for the group that will review the adoption files. The information system will not be needed for the case file review.

# C. ON-SITE REVIEW ACTIVITIES

There are five components of the AFCARS Assessment Review process. These are the:

- system demonstration using a sample case scenario;
- reports from the AFCARS utilities (Data Compliance, Data Quality and Frequency);
- State policy and procedures;

- paper case file review; and
- system review (screens and extraction code).

The Federal AFCARS team utilizes each component to assess the State's AFCARS data. Each component is discussed with the State team in order to gain a better understanding of the State's child welfare practice and policy, how the data are collected and extracted, and State staff's understanding of the data elements.

1. Day One – Entrance Conference and System Demonstration

The first day of the on-site visit begins with the entrance conference which serves to:

- introduce the Federal team to State management, project staff, and State review team;
- review the nature and scope of the on-site review;
- respond to any questions the State staff might have related to the AAR process; and
- make any final modifications to the on-site agenda.

Immediately following the entrance conference, the State presents a brief walk-through of the system that is used to collect and extract the AFCARS information. The State should ensure that appropriate technical and programmatic staff participate in the demonstration. The Federal team will provide the State review team with a sample case scenario onsite. This sample case scenario is entered as part of the system demonstration. The purpose of this activity is to observe the entire process of entering data, and learn the flow of the screens used to enter the data. The State team should also be prepared to identify the test cases that were entered during the pre-site visit phase.

# 2. Day Two – Case File Review

The Federal team provides the forms for each record drawn in the sample. This form contains the data submitted by the State for each element in the record. There are four columns to the form (see Appendix J for an example):

- column one lists the data elements;
- column two lists the information submitted to AFCARS by the State;
- column three is for noting information found in the case record; and
- column four is marked if the information does not match.

# Procedure

- □ An introductory briefing will take place before reviewing the cases.
- ☐ The entire State and Federal team will review case files and will be divided into two groups. One group will review the foster care files and the other group will review the adoption files.

- Once the team is finished reviewing the files, each team member shares with the group their significant findings. Once this process is completed, the Federal review team coordinator collects the forms.
- □ A preliminary analysis is conducted by the Federal team on site and the results are shared with the State team during days three and four. Final analysis of these forms is completed during the post-site visit review phase.
- 3. Days Three and Four Foster Care and Adoption Population and Elements
- a. Population and Data Element Review

During days three and four the Federal team meets with the program and technical staff that are responsible for oversight of the foster care and adoption services, policy development/implementation, and for implementing the technical requirements of AFCARS. Days three and four comprise the core components of an AFCARS Assessment Review. They build on the initial analysis conducted during the pre-site phase by the Federal team and the results of the test case entry and the case file review.

At this time, the Federal team asks several questions regarding the State's organizational structure, the population of children served, and other practice-related questions. These questions are asked throughout the day. At the same time, the technical documentation is reviewed and assessed on whether it is reflecting State and Federal policy, and State practice.

Appendices B and C contain a sample of the type of questions that the Federal team asks in regard to the foster care and adoption populations and the data elements.

The frequency report generated from the State's data for the report period under review, is assessed by the Federal and State staff to determine if the data are representative of the State's child welfare population. The States have their own copy of the AFCARS Frequency Utility and can use this report on an ongoing basis to evaluate their AFCARS data. Technical Bulletin #12 describes how to use the frequency report to evaluate the data.

When analyzing the program code, the types of issues that are identified include:

- Are there any AFCARS elements or values that do not have information mapped/extracted to it from the State system?
- Are there any relevant values in the State system that do not map to an AFCARS element?
- Are there any elements or values where the State's definition does not appear to match the AFCARS definition?
- Are there any State data collection policies or procedures that may cause some data not to be reported to AFCARS, or to be reported inaccurately (i.e., not reflecting the true circumstances of the case)?
- Does the program code exclude a group of children served that must be reported to AFCARS? Or, is it including children that should not be in the AFCARS reporting population?

# b. Document Review Findings

A preliminary draft of the findings is completed by the Federal review team on-site. Generally, the above review activities are completed by noon of the fourth day. The afternoon of the fourth day is left open in the event more time is needed for the population and data element review, or if time is needed for some other reason. Otherwise, this time is used by the Federal team to begin consolidating its findings.

At this time, the Federal team reviews all of the on-site findings for each component and assigns a rating factor for each general requirement and data element. The findings are documented in three tables, one for adoption, one for foster care, and one for the general requirements. The tables include notes, comments and significant findings of the AAR for each data element and general requirement.

In regard to errors found during the case file review, if there are ten percent or more of the cases having errors, this is determined to be a data quality issue and is noted in the preliminary findings. This may be the sole reason for an element receiving a "3." The State should also note that the preliminary findings are based on a cursory review of the case file review findings. Based on the final review, a rating factor of "4" may get adjusted to a "3," and the State will need to address improvements in data quality.

A preliminary draft of the tables are completed by the Federal review team onsite and shared with the State review team prior to the exit conference with the State agency administrators. The Federal and State teams review the findings in order to ensure agreement on the action items.

Depending on time, this meeting may be at the end of day four, or early on day five prior to the exit conference.

# 4. Day Five – Exit Conference

Once the on-site review process is complete, an exit briefing is held with the State review team and management officials.

The purpose of the exit conference is to:

- present specific findings resulting from the AAR process;
- report the preliminary recommendations and/or proposed resolutions to outstanding issues; and
- answer any questions that the State agency administrators might have as a result of the AAR.

The exit conference should include all staff members that were involved with the AAR during the week and senior management staff.

A one-page summary of the AAR findings is distributed during the exit briefing.

# CHAPTER VI: THE POST-SITE VISIT PHASE

#### A. INTRODUCTION

The post-site visit phase involves a final assessment by the Federal review team of the information gathered during the on-site review. A final report is written detailing the major findings from the assessment review, with copies attached of all of the detailed findings. The final report is signed by the Associate Commissioner of the Children's Bureau and mailed to the State agency.

While this is primarily a set of activities conducted by the Federal review team, the State may use this time to begin making corrections to the system or the extraction code based on the preliminary on-site findings. Also, the State team should utilize this time to plan when it anticipates each task can be completed.

#### B. FINAL ANALYSIS

Although the major portion of the AFCARS evaluation is conducted on-site, a number of steps in the assessment and documentation analysis may be completed during the post-site visit phase. These steps include consolidation of documentation from all members, consultation among Federal team members, and a final analysis of all findings, documentation, and (if applicable) revised program code. The Federal review team coordinator may contact the State with additional questions or request additional information.

The final rating factors may differ from those given as the preliminary on-site ratings. Changes in the rating factors reflect the post site-visit review of the case file review findings, the State's program code, and the system screens.

Changes/corrections to the program code or the system screens may be submitted to ACF for inclusion into the final analysis no later than 45 calendar days after the completion of on-site review.

# C. FINAL REPORT

The final report is issued to the State within 90 business days after the completion of the on-site review. The purpose of the final report is to document the findings of the AFCARS Assessment Review, including the agency's strengths, areas needing improvement, and changes necessary to meet all of the AFCARS requirements at 45 CFR 1355.40.

The AFCARS Assessment Review report to the State will include:

- a cover letter;
- an introduction that provides an overview of the background and purpose of the AAR;
- a summary of the findings and required changes;
- a table with the completed findings; and,
- the AFCARS improvement plan matrices.

Once the State receives the final report with the final findings, and if there are areas that need correcting, the AFCARS Improvement Phase begins. This phase is discussed in the next chapter.

# D. DISSEMINATION OF THE FINAL REPORT

The Children's Bureau will provide copies of the report to the appropriate officials at the State agency, CFSR staff, the Children's Bureau's Division of State Systems, and the ACF Regional Office. All documentation is retained by ACF as part of the permanent archive file on the State's AFCARS. Additionally, the State's final report, including all attachments, is posted on the Children's Bureau web site at http://www.acf.hhs.gov/programs/cb/systems/afcars/review.htm.

# CHAPTER VII: AFCARS IMPROVEMENT PHASE

#### A. INTRODUCTION

If there are areas that must be corrected in order for the State to meet the requirements established in the AFCARS Federal regulation at 45 CFR 1355.40, the appendices to 45 CFR 1355, AFCARS policy, and Technical Bulletins, the State enters the AFCARS Improvement Phase. This phase begins once the State receives the final report and improvement plan and ends when the State has made all system changes and the quality of the data have improved and remain consistent. The elements/general requirements that receive a rating factor of "3" or lower make up the action items in the plan.

# **B. AFCARS IMPROVEMENT PLAN (AIP)**

As applicable, there is an improvement plan for the general requirements and for the data elements. Each requirement will be grouped by the rating factor it received.

The AIP included with the report does not include due dates. After the site visit the State should evaluate each item (general requirement and/or data element) that needs correcting and determine the length of time it will take to complete the item. Within 30 days of receipt of the final report, State staff must submit the AIP electronically to the ACF Regional Office with dates for completing each task. Upon receipt of the State's initial AFCARS Improvement Plan, the ACF Regional Office and the Children's Bureau will review the due dates to ensure the AIP is implemented in a timely manner. A factor to take into consideration when developing a schedule for completing the task items would be when the State is scheduled to have its CFSR. By making necessary corrections as soon as possible, the data used for the CFSR will be more accurate and better reflect the State's child welfare practice. An electronic copy of the final matrices, with agreed upon due dates, is e-mailed to the State by ACF.

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) to be submitted by June 30<sup>th</sup> of each year. Changes being made to the system should also be included in the State's Advance Planning Document (APD) Update to the Children's Bureau Division of State Systems.

The State should make the changes necessary to meet the applicable requirements and standards in as timely a manner as possible. Inasmuch as the AFCARS data are used for several significant activities at the Federal and State level, the State's implementation of the task items will be a contributing factor to improving the quality of its data.

At the end of the on-site review, the State drafts estimated due dates for each action item
Upon receipt of the final report, request electronic copies of the AFCARS Improvement

Matrices from the ACF Regional Office.

Procedure

Within 30 days of receipt of the report, the State submits to ACF the State's due dates for
each action item.
The first quarterly report is due three months after submitting the initial improvement plan.

#### C. PROGRESS REPORTS

The State must provide quarterly updates of its progress to the ACF Regional Office. The first quarterly submission is due three months after the State submits its initial improvement plan with the planned completion dates for each task item. Each subsequent progress report is due quarterly thereafter.

The quarterly submissions of the electronic AIP are used by the State and ACF for tracking changes, progress notes, and ACF approval of completed items. The State should e-mail the ACF Regional Office this document with completion dates and any notes on what the State has accomplished. As changes are made to either the program code or screens, documentation noting the updates (e.g., screen shots or revised program code) must be included with the electronic AIP.

In addition to analyzing the program code and the screen prints, ACF will periodically generate frequency reports on data files. This provides ACF with an additional tool to assess the quality of the State's AFCARS data.

#### D. CLOSE-OUT OF AFCARS IMPROVEMENT PLANS

The AIP will be considered complete once all agreed upon tasks/revisions have been completed, and an analysis of the State's AFCARS reports demonstrate that the improvements result in complete and accurate data. Upon completion of the AIP, the State must submit the updated AIP to the ACF Regional Office. The ACF Regional Office will then provide the State with a set of test cases. These test cases are used to analyze whether all changes in the technical documentation are accurate.

ACF will also run a frequency report on the most recent data submitted by the State and assess it for improvement in the quality of the data. ACF may also utilize other means, such as reports generated by the Children's Bureau's Data Team to determine accuracy of the State's data.

Once ACF and the State are satisfied with the improvement in the quality and accuracy of the data, the Children's Bureau will send a close-out letter to the State. The letter will include a summary of the final findings and actions taken by the State, as well as the completed AIP.

#### E. TECHNICAL ASSISTANCE

The ACF Regional Office will work with the States to identify technical assistance needed to implement the AIP. The State may also access technical assistance from the Children's Bureau's National Resource Center for Child Welfare Data and Technology (NRC-CWDT). The Resource Center can be contacted at (877) 672-4829, or at its web page:

http://www.nrccwdt.org. For on-site technical assistance from the NRC-CWDT, contact your ACF Regional Office.