

**South Dakota
AFCARS
Assessment Review
Report**

August 2005

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

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Executive Summary

From April 25 - 29, 2005, staff of the Children’s Bureau, Administration for Children and Families (ACF) Region VIII, and the Office of Information Services (OIS) conducted an assessment review of South Dakota’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the Family and Children Information System (FACIS). The AFCARS data used for the review was from the report period April 1, 2004 through September 30, 2004 (2004B).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings” matrices for the foster care and adoption data elements, and the general requirements (Tab A). The minimum tasks that are required to correct the State’s reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

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

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	20 (30%)	26 (70%)	46 (45%)
3	19 (29%)	10 (27%)	29 (28%)
2	26 (39%)	1 (3%)	27 (26%)
1	1 (2%)	0	1 (1%)

The State has taken a very proactive approach to making necessary technical corrections, both as a result of this review and prior technical assistance provided to the State by the National Resource Center for Child Welfare Data and Technology. The State also has methods to assess the quality of its data on an ongoing basis. One of these tools is the State’s “Compliance Report.” This is a means for the worker to see how many items are complete or overdue.

The State does not have a substantial number of technical corrections to make to the program code and/or the screens. Of the 26 foster care elements that received a rating factor of two, 16 relate to the conditions associated with why a child was removed from his/her home. The State

is implementing a change to the input screen that will allow caseworkers to select all of the conditions that apply, instead of just one.

The more significant corrections that need to be made to the system that will require the State to commit a greater amount of resources and time are to those elements for which the State is not able to collect and report information. The one element that the State has no capacity to report on is title IV-A as a source of Federal support for a child. The State has not completed its interface with the title IV-A information system and FACIS does not have a field that will allow a worker to enter the information. The State must develop a means to collect and report this data regardless of the status of the interface. The AFCARS data are mandatory and must be collected.

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

One area where data was found missing during the case file review related to information on foster parents. The State contracts for placement services with private child-placing agencies and has provided these agencies with access to FACIS. The State must ensure that these data are entered in a timely manner into the system by the contractual agencies. This is required information that the State must provide and it is important to assess the make-up of families that volunteer to be foster parents.

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data and assess its validity prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office and the Children's Bureau with estimated due dates for completing the tasks in the Improvement Plan.

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

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

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data is also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State’s AFCARS.

RATING FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • 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 data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on 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.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a “2” will be

assigned. If it appears the problem is due to data entry, then a “3” will be assigned to the requirement.

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

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period April 1, 2004 through September 30, 2004 (2004B).

As part of the post-site visit analysis, the State’s documents, the data, the case file review findings, team member notes, and corrections to the program code submitted by the State are assessed to make the final determination of findings. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a “strike-through” mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

Data Elements - Technical Errors

There are six foster care elements and seven adoption elements that require system modifications.

- Foster care element #61, Title IV-A as a Source of Federal Support

This element captures whether while the child was in foster care did he/she receive title IV-A (TANF) at any time during the six-month report period. Currently, the State does not have any means to capture this information. There is not a field on any screen nor is there an interface with the State’s title IV-A information system. This is an item the State must address in order to become compliant with the Statewide Automated Child Welfare Information System (SACWIS) requirements. However, regardless of the status of the State’s SACWIS, this information is required for AFCARS reporting purposes. The State must develop a means to collect, record, and report this data.

- Foster care elements # 16, Has this child ever been adopted and #17, Age at Adoption

There are currently no data entry fields for these elements in the system. However, the State is able to report some information based on assessing whether a child entering foster care had previously been adopted from the State's foster care system. The State must be able to determine if all children in foster care have been previously adopted regardless of the location of the adoption (in-state, out-of-state, or a foreign adoption) and whether it is a private or public agency adoption.

Since the State must make modifications to the system, it may want to consider adding additional fields in order to track the requirements for the Inter-country Adoption Act for the title IV-B State plan. If the State would like additional information on how other States have approached collecting this data, contact the National Resource Center for Child Welfare Data (NRC-CWDT).

- Foster care elements #26 - 40, Actions or Conditions Associated With Child's Removal

The issue related to this set of elements is that the State is unable to report more than one option. The State staff indicated that they are making changes to the screen that will allow the worker to select all applicable conditions associated with why a child was removed from his/her home. Additionally, the results of the case file review indicated that that many more circumstances were applicable at the time of the child's removal than what was indicated in AFCARS. This data is important for the analysis of why children are entering foster care and to assess areas to be targeted for prevention and other services.

- Foster care elements #23, 24, 41, and #49 - 55, Placement and foster parent information

One of the issues related to the placement data concerns the collection and reporting of a runaway status. The State agency is unable to report the date a child runs away from his/her placement to AFCARS, nor is a living arrangement of a runaway recorded. Instead, the worker enters a "placement exit reason" for the runaway. The State needs to modify the program code in order to extract the required information.

The other issue related to the placement elements is due to the underreporting of data on children placed through child placement agencies. These agencies have access to the system and they need to enter all data regarding placements (all locations, dates, and foster parents) into the system. The State must develop a means to ensure these agencies enter the data accurately and in a timely manner.

- Foster care element #59, Title IV-E foster care maintenance

The program code extracts whether the child is title IV-E eligible and not that there was a payment made during the six-month report period. The accuracy of this element is very important as it is the basis upon which a sample is drawn for the title IV-E foster care reviews. The State must correct the program code prior to its next title IV-E review.

Data Quality

Once the above elements are corrected the quality of the data will need to be assessed. In some instances, training regarding new fields or screens will have to be implemented. In addition to these elements, the quality of the data for an additional 29 elements (19 foster care and 10 adoption) needs to improve. One way to address accuracy of the data is through additional training and supervisory oversight. The State needs to incorporate ongoing data quality assurance to ensure that the data are correct and consistent.

There are also issues that are probably related to data conversion. For the removal and placement information, most of the errors identified could be attributed to a lack of data entry when the State's information system became operational. Data entry was not identified as an urgent issue and should be addressed on cases that are now closed when, and if, they re-open. The State should encourage workers to clean up the removal and placement information on open cases in which there was a prior foster care history that occurred before use of the new information system.

CONCLUSION

Overall, the State did well on its AFCARS review. There are some technical issues that remain to be addressed, but many of these are minor. The State needs to place a high priority on those areas where it is not able to collect the data and on those changes that will impact several elements at once.

The State must also make it clear to agencies it contracts with that they are to provide the State with complete, accurate, and timely data on children. This is especially true for data regarding placements, as this is information that the State is assessed on as part of the Child and Family Services Review. You may want to consider including this requirement in a performance-based contract with the private agencies.

Since there are issues that will also impact the compliance of the State's SACWIS, the State needs to work closely with the ACF Regional Office and the Division of State Systems and provide timely updates to its Advance Planning Document.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments. Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office 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 Kevin Gomez in the ACF Regional Office and Angelina Palmiero of the Children's Bureau.

Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

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

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

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.