

**Minnesota
AFCARS
Assessment Review
Report**

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

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Executive Summary

From August 8 - 12, 2005, staff of the Children’s Bureau, Administration for Children and Families (ACF) Region V, and the Office of Information Services (OIS) conducted an assessment review of Minnesota’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the Social Services Information System (SSIS). The AFCARS data used for the review was from the report period October 1, 2004 - March 31, 2005 (2005A).

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

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	4

Rating Factor	Foster Care (66)
4	13 (20%)
3	33 (50%)
2	20 (30%)
1	0

Rating factors have not been given for the adoption data elements because the State’s AFCARS assessment review is not complete. This is due to the State’s use of an Access database to collect statewide adoption data, and the extraction of the AFCARS adoption file from this database rather than SSIS. Inasmuch as the State has an operational Statewide Automated Child Welfare Information System (SACWIS), it must comply with Federal regulations at 45 CFR 1355.52, which is the funding authority for SACWIS. Since the State is not fully utilizing SSIS to collect the AFCARS adoption data elements and is not extracting the adoption data file from SSIS, the State is not in compliance with the SACWIS regulation. According to the State’s Annual Advanced Planning Update of March 5, 2005, the design and development of integrating adoptions into SSIS will be completed by July 2005. It is our expectation that the adoptions module in SSIS will also be fully operational at that time. Once the State has added the

remaining fields needed to collect the adoption data to SSIS, written the extraction program code, and provided the necessary screen prints, ACF will complete the AFCARS assessment review.

There were two problems with the foster care reporting population. The State is incorrectly including Tribal children for whom it or the county does not have responsibility for care and placement, but for whom the county provides funds to the Tribe for the placement of the child. The State must only report those children for whom it has responsibility for care and placement. The State is also incorrectly including youth who have reached the age of majority, but are receiving voluntary services from the State. The State does claim title IV-E funds for youth up to their 19th birthday if the individual meets the title IV-E requirements, and is correctly including them in the AFCARS report. If the youth no longer is receiving title IV-E funds, however, he/she should be considered discharged for AFCARS purposes. The reason for discharge would be “emancipation,” unless there is another appropriate outcome reason. The State staff made changes to the discharge date and discharge reason elements in the extraction code. However, the change for the date of discharge is incorrect and the Federal review team and the State need to discuss this section further.

The AFCARS review team identified a significant problem with the method the State uses to create its record numbers. This problem also has implications for the creation of an AFCARS annual file, which is used for the data profiles in the Child and Family Services Reviews and the annual report to Congress. The AFCARS regulation states that if a State uses a unique (encrypted) record number that it must follow the child as long as he or she is in foster care. In certain situations, the State is not using the same record number for a child each time it submits its AFCARS data. This occurs for children that are new to the State agency for foster care services. The county assigns a number and then the case is “cleared” to the State. At that time, another number (a statewide number) is assigned to the case. There should only be one number assigned to a child/individual.

Based on the case file review, there were a significant number of errors found in the dates of first removal, the date of latest removal, and the number of removal episodes. The majority of the errors were due to the reviewers finding earlier dates of removal than what was reported in the AFCARS data.

Lastly, the State is not including all types of placements. There are some settings that are not included as placements that must be included. Also, the case file review findings indicate that there are more placement moves than what are being reported in AFCARS.

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

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

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff are to submit the Improvement Plan electronically to the ACF Regional Office, OIS, and the Children's Bureau with estimated dues 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 October 1, 2004 - March 31, 2005.

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

Statewide Automated Child Welfare Information System (SACWIS)

The State is using an Access database to collect statewide adoption data and the AFCARS adoption file submission is extracted from this database and not the Social Services Information System (SSIS). Inasmuch as the State has an operational SACWIS, it must comply with Federal regulations at 45 CFR 1355.52, Funding Authority for Statewide Automated Child Welfare Information systems (SACWIS), paragraph (a)(1). This requirement provides that:

(a) States may receive Federal reimbursement at the 75 percent match rate for FY 1994, FY 1995 and FY 1996, and at the 50 percent level thereafter for expenditures related to the planning, design, development and installation of a statewide automated child welfare information system, to the extent such system:

(1) Provides for the State to collect and electronically report certain data required by section 479(b) of the Act and Sec. 1355.40 of this part;...

Additionally, 45 CFR 1355.53(b)(1) provides that a State must:

“Meet the Adoption and Foster Care reporting requirements through the collection, maintenance, integrity checking and electronic transmission of the data elements specified by the Adoption and Foster Care Analysis and Reporting System (AFCARS) requirements mandated under section 479(b) of the Act and § 1355.40....”

Since the State is not fully utilizing SSIS to collect the AFCARS data elements (primarily those related to the adoption file), nor is it extracting the adoption data file from SSIS, it is not in compliance with this regulation.

Minnesota’s AFCARS assessment review is considered incomplete until the State fully utilizes SSIS to collect all of the AFCARS data elements and the adoption data elements are extracted from SSIS and not the Access database. For the purposes of the AFCARS assessment review, the Federal review team provided technical assistance to the State in regard to the collection and reporting of the adoption data elements. The element findings in Tab A includes this feedback. As part of the State’s improvement plan, the State will need to submit print outs of all relevant screens, the extraction program code, and any other necessary documentation in order for ACF to complete the AFCARS review.

General Requirement Standards

There were two problems with the foster care reporting population. The State is incorrectly including Tribal children for whom it or the county does not have responsibility for care and placement, but for whom the county provides funds to the Tribe for the placement of the child. The State needs to exclude these records from the AFCARS reporting population. The second problem relates to the reporting of youth who have reached the age of majority. In Minnesota, the age of majority is 18. The State does claim title IV-E funds for youth up to their 19th birthday if the individual meets the title IV-E requirements, and is correctly including them in the AFCARS report. The State also provides services to youth through a voluntary arrangement after the age of 18, regardless of eligibility for title IV-E funds. The State incorrectly includes these youth in AFCARS. Once a child reaches 18, or 19, if appropriate, the State must report these individuals as discharged. The reason for discharge would be “emancipation,” unless there is another appropriate outcome reason. The State staff made changes to the discharge date and discharge reason elements in the extraction code. However, the change for the date of discharge is incorrect and the Federal review team and the State need to discuss this section further.

In regard to the reporting of adoptions in which there is State agency involvement, AFCARS requires States to report “(b) all special needs children, whether or not they were in the public foster care system prior to their adoption and for whom non-recurring expenses were reimbursed. c) Children adopted for whom an adoption assistance payment or service is being provided based on arrangements with the State agency.” (45 CFR 1355 Appendix B, Section II). The State has adoption agreements with, and provides subsidies to, families that adopted a special needs child through a private agency. The State is not including these adoptions in AFCARS, and must begin doing so immediately. The State should note that these adoptions count towards the number used to determine a States’ adoption bonus.

Data Elements

- Record Number (Foster Care Element #4)

The AFCARS review team identified a significant problem with the method the State uses to create its record numbers. This problem also has implications for the creation of an AFCARS annual file, which is used for the data profiles in the Child and Family Services Reviews and the annual report to Congress. The AFCARS regulation states that if a State uses a unique (encrypted) record number, it must follow the child as long as he or she is in foster care. In certain situations, the State is not using the same record number for a child each time it submits its AFCARS data. This occurs for children that are new to the state agency for foster care services.

When a county first receives information on an individual they check if the person is already known to them and if there is a previous case record. If the individual is new to the agency, the county assigns a county number that must be cleared to the State. This ensures that the individual is not already known to another agency in the State. Once the number is cleared to the State, a statewide number is assigned to the individual. This number becomes the permanent person identifier number. The problem arises if at the time the AFCARS file is created and sent to ACF the State identifier number has not yet been assigned. In this case, the AFCARS extraction code will encrypt the county number but in succeeding submissions the State identifier number is assigned and this becomes the new encrypted record number. Because the State sometimes submits an encrypted county number followed by a different encrypted State number, there is not a single record number that follows the child while he/she is in foster care.

In addition to this method not being consistent with the regulations, it prevents the Children's Bureau from matching records of the same child for the first two report periods of a child's AFCARS records, thereby resulting in a significant number of records being dropped between the two report periods. The State must submit only one record number for a child for every AFCARS report period for the child's complete history with the child welfare agency.

- Removal Information (Foster Care Elements #18, #19, #20 and #21)

In the case file review there were a significant number of errors found in the dates of first removal, the dates of latest removal, and the number of removal episodes. The majority of the errors were due to the reviewers finding earlier dates of removal than what were reported in the AFCARS data. There were also more removal episodes than what were reported, which also caused errors in the date of discharge from the previous removal episode. There was one technical issue in the program code regarding the extracting of dates of first removal, and the State has corrected this problem.

The system has a "removal and adoption history" screen. The purpose of this screen is to collect certain historical information on the child. This screen has two fields, one for the county to enter the date of first removal recorded in the county and a field to record an earlier removal date, if known. There appears to be a problem with workers not getting and/or entering the information for the second field, especially if the child's foster care episode was in another county(ies).

Additionally, there is a problem with the program code. It does not check the “removal history, earlier removal date” field on this screen.

The State is required to report the date of a child’s first-ever removal from home and the total number of times a child has entered foster care. This is regardless of which county had responsibility for the case or who now has responsibility. The data is to reflect the child’s experience, not a county’s experience with the child. The State needs to review and clean up data regarding a child’s prior experience with the foster care system.

- Placement Information (Foster Care Elements #23, #24 and #41)

The State is not including all types of placements. The State excludes hospital stays exceeding 30 days (the State’s definition of an acute care stay), boarding school, intermediate care facility for mental retardation, and juvenile correctional facility (locked) as placements. In addition, when the placement reason is “consequences - 30 days or more” or “behavioral consequences less than 30 days” the setting is not considered a placement. All of these situations must be considered placements and included in the number of placement settings (foster care element #24). The case file review findings indicate that there are more placement moves than are being reported in AFCARS.

Data Quality

There are elements in which the quality of the data needs to improve. There were 33 foster care elements that require additional training and supervisory oversight for the timeliness and accuracy of data entry. Two significant areas that appear to be underreported are the circumstances associated with a child’s removal from home and whether a child has been diagnosed with a disability. There are some technical corrections to mapping and the program code for the disabilities that need to be addressed, but there is also an issue with workers not entering or updating the information in both areas.

There were several elements that needed technical corrections; the State made these corrections and submitted them to ACF. These data elements have been given a rating factor of “3.” The State will now need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

CONCLUSION

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

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

electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to Christine Guthrie in the ACF Regional Office and Angelina Palmiero in the Children's Bureau.

Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). Once the State has completed the AIP, notify the ACF Regional Office. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

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

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