

Mr. Kevin Goodno, Commissioner
Minnesota of Department of Human Services
444 Lafayette Road
St. Paul, Minnesota 55155

Dear Mr. Goodno:

From August 8 - 12, 2005, staff of the Children's Bureau, 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). The AFCARS data used for the review was from the report period October 1, 2004 - March 31, 2005 (2005A). I have summarized the major findings from the AFCARS review in this letter. Enclosed please find the full report.

The AFCARS assessment review evaluates two areas: the AFCARS general requirements (reporting populations and technical standards) and the data elements. Information collected on these areas is combined and a rating factor is assigned to the general requirements and 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 State was found to be in full compliance with the technical standards. The State is not in full compliance with two foster care population standards. Additionally, the AFCARS assessment review could not be completed for the adoption component. States that have an operational Statewide Automated Child Welfare Information System (SACWIS), and have had a SACWIS assessment review prior to the AFCARS review, are expected to be collecting and extracting all of the adoption data in the SACWIS. Minnesota is not doing this. Instead, it has an external database (Access) that is used to collect the data from the counties. There are some fields that are required for AFCARS reporting that are not in the State's Social Services Information System (SSIS), but are in the Access database. These data are also being extracted from the Access database, not 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. 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.

In general, the State did well in regard to the collection of the foster care data elements, although fifty percent of the elements require some attention to quality, either through training or improved supervisory oversight of accurate and timely data entry. Twenty percent of the foster

care elements do require additional technical modifications, either to the program code or enhancements to the screens.

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. There should only be one number assigned to a child/individual at the time a record is created.

Based on 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 was reported in the AFCARS data.

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.

Lastly, another issue identified during the review pertains to the reporting of child support information. The State is to report whether a child support payment was a source of financial support on behalf of the child during the report period. According to the child welfare staff the information reported to AFCARS was only on those children receiving public assistance. According to the child welfare staff, the State's child support office would not provide the information on behalf of all children in foster care. This is incorrect. My staff verified if there are any requirements prohibiting State child support offices from providing payment information and the Office of Child Support clarified that there is no such prohibition. We expect that the State will have this addressed by the next reporting submission.

You should note that as a result of the technical corrections made to the system, the State's semi-annual data submission may fail to meet the missing data standard. In order to ensure that the data are complete and accurate, the agency must require workers to enter the data and assess its validity prior to submitting it to ACF. To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility posted on the Children's Bureau's website.

The enclosed documents include the final report of the on-site review, the final findings of the general requirements and data elements, and the AFCARS Improvement Plan for the general requirements and the data elements. 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 completion dates for the tasks identified in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State is to provide electronic quarterly updates of its progress to the Regional Office.

Test cases will be provided to the State once all of the required modifications are completed. Dates for the submission of the extracted test data file will be arranged with the ACF Regional Office and OIS. Once ACF and the State agree that the quality of the data is acceptable, the AFCARS Improvement Plan will be considered finished, and a letter will be sent to the State from the Children's Bureau confirming this fact. The letter will include a summary of the actions taken by the State and the completed AFCARS Improvement Plan.

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). Also, the State's Annual Planning Document must be updated, as applicable, and submitted to the Division of State Systems.

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 NRC-CWDT. If you wish to request on-site technical assistance from the NRC-CWDT, please contact your ACF Regional Office.

In closing, I would like to thank the staff who participated in the review for their hard work and commitment to collecting accurate and reliable AFCARS data. If you have any questions regarding the report, please contact Angelina Palmiero at (202) 205-7240.

Sincerely,

Susan Orr, Ph.D.
Associate Commissioner
Children's Bureau

Enclosures

cc: Chuck Johnson, Assistant Commissioner, CFS
Erin Sullivan Sutton, Director, CSP
Gwen Wildermuth, Director, SSIS
Joyce Thomas, Regional Administrator, ACF Region V
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Angelina M. Palmiero, M.S.W, AFCARS
Terry Watt, Director, Division of State Systems
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