

**Oklahoma
AFCARS
Assessment Review
Report**

February 2007

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

Executive Summary

From August 21 - 25, 2006, staff of the Children’s Bureau, Region VI, and the Office of Information Services (OIS) conducted an assessment review of Oklahoma’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in the State’s system KIDS (not an acronym). The AFCARS data used for the review was from the report period October 1, 2005 through March 31, 2006 (2006A).

Two major areas are evaluated as part of an AFCARS Assessment Review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements and 26 of the 27 AFCARS general requirements is assessed on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element and general requirement. A scale of zero (State’s Statewide Automated Child Welfare Information System (SACWIS) does not collect one or both of the AFCARS files) to four (fully meets AFCARS standards) is used to assign a factor to each element. A summary of the significant findings is included in the report, and detailed findings can be found in the “Detailed Findings” matrices for the general requirements, the foster care and adoption data elements (Tab A). The minimum tasks that are required to correct the State’s reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

General Requirements (26)

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

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	19(29%)	19(51%)	38(37%)
3	35(53%)	11(30%)	46(45%)
2	12(18%)	7(19%)	19(18%)
1	0	0	0

As noted in the above, the State is in compliance with the reporting population requirements for the foster care and adoption files. However, the State received a rating of “3” for the technical requirement related to data conversion. The State was found to need improvement in the accuracy of the data for removal episodes. Not all removal episodes were entered into the system at the time of conversion. This information is crucial to the evaluation of a State’s child welfare practices. In order to determine if the number of children re-entering foster care is

actually increasing or decreasing, a complete removal history is needed in the information system.

In regard to the data elements, the most significant finding is in the need for improved completeness and accuracy of the data entered into KIDS. The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

There are some technical changes required for the foster care and adoption data elements. One significant area is in the collection of whether a child has been diagnosed with a disability. This is an area that the State staff had already identified as needing changes and was in the process of designing and making modifications to the system. The Federal review team provided the state staff with feedback which is noted in the findings matrices. Other changes are required to both the KIDS screens and to the program code that extracts the data. Once these changes are made, underlying data quality issues may surface. These elements and those that received a rating factor of “3” will require additional training and supervisory oversight for the timeliness and accuracy of data entry.

Additionally, changes made to the program code 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 the data are complete, the agency must require workers to enter the data in a timely manner, increase supervisory oversight, and assess the validity of the data prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency’s responsibility.

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

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the Regional Office, OIS, and the Children’s Bureau with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to the Regional Office and the Children’s Bureau.

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

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

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

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BACKGROUND

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

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

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

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data are also compared against a small, randomly

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

selected number of hard copy case files. Through this exercise, the accuracy of the State’s data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

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

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

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

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

	<ul style="list-style-type: none"> Information is coming from the wrong module or field in the system. Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. The system needs modification to encompass more conditions, e.g., disability information. The extraction code for the AFCARS report selects and reports incorrect data.
1	<p>An AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). There is no program logic to extract the information. There is 100% missing data according to the frequency report or DCU/DQU reports.
0	<p>States operating an automated information system for which they received SACWIS-level FFP were found to be using an external automated information system, or a database (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS system. In addition, there is no program code for the extraction of data from the SACWIS.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 0 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a “2” to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A rating factor of “4” (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

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

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

FINDINGS

This section provides the major findings resulting from the review of the State’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS

requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period October 1, 2005 – March 31, 2006 (2006A).

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

General Requirements

The State is in compliance with the reporting population requirements for the foster care and adoption files. However, the State was found to need improvement in the accuracy of the data for removal episodes. Not all removal episodes were entered into the system at the time of conversion. This is information that is crucial to the evaluation of a State's child welfare practices. In order to determine if the number of children re-entering foster care is actually increasing or decreasing, a complete removal history is needed in the information system.

Data Elements

In a majority of the data elements the quality of the data needs to improve. In certain instances the issue relates to the timely entry of data, as in the entry of placement information. In other areas not all information is being entered (such as the conditions associated with a child's removal). The dates of birth for both caretakers and foster parents are not being entered into KIDS for all individuals. In many instances this information can be found in the paper case files as demonstrated by the case file review.

There were areas in which the value "unable to determine" was entered inappropriately. One example is the question "was the mother married at the time of the child's birth." There were a significant number of records with a response of "unable to determine," but the child had not been abandoned.

The State made some corrections to the program code based on the preliminary findings of the on-site review. These revisions were submitted to ACF after the on-site visit in time to be incorporated into the final findings. The original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a "strike-through" mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor. The State will need to implement additional measures to ensure the accuracy of data entry and improve the quality of the data. In some instances this involves data clean-up, additional training, and/or supervisory oversight to ensure timeliness of data entry.

Another area that affected the accuracy of the data is conversion. The State had a pilot AFCARS review in 1997 and at that time conversion issues were noted and the State was instructed to go through all open cases and for cases that reopen, to enter all removal episodes. During the State's AFCARS Assessment Review this year there were still cases with incomplete removal

episodes. The State must check all cases to ensure that the full removal history has been entered for each child into KIDS.

One area that requires substantial modifications to the system is in the area of child disability information (foster care elements #10 - 15). For AFCARS reporting purposes, the information reported for these elements reflects chronic and/or significant diagnosed conditions that the child may have. A resource list of conditions to be mapped to AFCARS is listed on the Children's Bureau's web page at <http://www.acf.hhs.gov/programs/cb/systems/afcars/resources.htm>.

Oklahoma's AFCARS data indicate an underreporting of this data. The State has planned enhancements to the system to better collect diagnosed conditions. Once the State makes these enhancements and the changes noted above, ACF will reassess the data and determine whether additional modifications are needed to bring together all of the screens related to diagnosed conditions into one area. One other change that needs to be made to the medical history section of KIDS is the fields for recording diagnosed conditions. They are text fields, which cannot be stored as a database table. The State must modify these to be database fields and modify the program code to also check for diagnosed conditions to be mapped to AFCARS.

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

There are also a few changes required for the extraction of placement information. The State does not include placement in a detention center that is less than 30 days. All placements in detention centers are to be included in the extraction regardless of how long the stay lasts. Also, hospital stays that are for longer than a brief absence from an ongoing foster care setting are not counted as placement moves and must be included.

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

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

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the Regional Office,

OIS, and the Children's Bureau with estimated dues 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 Janis Brown in the Regional Office and Angelina Palmiero in the Children's Bureau.

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

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

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