

**Kansas
AFCARS
Assessment Review
Report**

March 2008

**Prepared by:
Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

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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 at 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 of the Social Security Act. 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 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.

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 staff understanding of the data elements. The data are also compared against a small, randomly selected number of

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).

hard copy case files. Through this exercise, the accuracy of the State’s data 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.

	<ul style="list-style-type: none"> • 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. • 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 both to system issues and to caseworker 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 caseworker 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. The AFCARS data used for the review were from the report period October 1, 2006 through March 31, 2007 (2007A).

As part of the post-site visit analysis, the State's documents, the data, the case file review findings, the onsite notes, and team member notes 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. As a result of the post-site visit analysis, some of the rating factors have changed. The findings matrix in Tab A indicates the previous rating with a "strike-through" mark on it, and the new rating.

Tab B contains the AFCARS Improvement Plans (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 element, the final rating factor, finding(s), task(s), the date the task is estimated to be completed, and one for comments.

Overview of Kansas data collection

The State's information system is a non-SACWIS model. The State utilizes forms that are completed by the caseworkers of the Department of Social and Rehabilitative Services (SRS) and caseworkers of the private provider agencies that SRS contracts with for services. The initial report and subsequent investigation, if applicable, is conducted by SRS. The face sheet is to be completed on all reports and allegations received by SRS; as additional information becomes available, it is to be added to the face sheet.

If it is determined that the child must be removed from his/her home and placed into foster care, the agency makes the decision and refers the case to the appropriate local contract provider. A form "Initial Referral to Out of Home Placement Provider for Child in SRS Custody" is completed and is used to inform the case management provider that a child has been referred for out-of-home placement and to provide the essential information to make initial plans to take the child into care. The form is e-mailed to the provider. If information that is necessary to complete the form is not available at the time of the referral, the SRS worker is to note this on the form. As various forms are completed, copies are sent to SRS and the information is entered into SRS' system Family and Children Tracking System (FACTS) by Human Services Aides (HSA).

Juvenile Justice Administration

The Kansas Department of Social and Rehabilitative Services (SRS) has an interagency agreement with the Juvenile Justice Administration (JJA) in order for JJA to receive foster care maintenance and administrative funds on behalf of its youth that are eligible for title IV-E of the Social Security Act. JJA provides a file to SRS of its youth receiving title IV-E for submission to AFCARS. JJA is currently writing a new extraction code to use for extracting data from its system. JJA must provide a copy of the new extraction code to the Children's Bureau as part of the State's AFCARS Improvement Plan for review and analysis. In the enclosed foster care data element findings, there are areas that JJA must address as it is developing its new program code.

For example, during the case file review it was found that the records being submitted from JJA are incorrectly counting removal episodes. As a result, this also impacts the total number of placements. The findings and the improvement plan matrices have a subsection labeled "JJA."

In certain instances, the element received a rating factor of “2” because of the errors found with the JJA data. As JJA writes its new extraction code, it should review those findings specific to JJA, but also those for SRS in order to ensure the new code is correct.

General Requirements

Overall, the State has met the AFCARS General Requirement Standards. There were a few areas, noted below, where the data need to improve. In general, many of the corrections will be completed on individual data elements. Once these changes are completed, the data specific to these issues will improve and the corrections for the General Requirements will be completed.

Foster Care Population

The State currently is incorrectly including in the foster care population youth over the age of 18, or 19 if the child had been eligible for title IV-E funds. The State will need to develop a method to report these youth as discharged as of their 18th birthday, or the day in which the youth is no longer title IV-E eligible. The outcome is to be reported as “emancipation.” The changes to data entry and the extraction code are noted in foster care elements #6, 57, and 58.

Technical Standards

The AFCARS data extracted must reflect information in the system as of the last day of the reporting period. The test case scenarios entered and extracted in the system had several elements reflecting information entered into the system after the last day of the reporting period. This affects both the current report period being submitted, as well as prior report periods that the State resubmits. In these instances, data for the current year are extracted and not the information on the case at the time of the prior report period.

Additionally, the State is required to report all adoptions in which the State agency has involvement. It is possible that the State is not receiving credit for all its adoptions. The program extraction code only looks for adoption legalization dates that occurred for the current report period being extracted. Consequently, if the legalization date is not entered into the system prior to the extraction and reporting of the report period, it will also not be extracted, and reported, in the next data submission. In addition to being a requirement that all adoptions be reported, this approach has consequences for the Adoption Incentive program. The State is not getting credit for all adoptions completed in a fiscal year. The State needs to implement a method that will identify those adoptions already reported, and then modify the program code to extract information on an adoption that has not already been submitted along with those that were finalized during the reporting period being submitted.

Data Elements

There were 43% of the data elements that received a rating factor of two; 31 (47%) foster care elements and 12 (32%) adoption elements require system and program code modifications. This may involve a screen design, mapping changes, or a change in the extraction routine. Once these changes are made, underlying data quality issues may surface.

- Hispanic/Latino Origin (Foster Care Elements #9, 53, and 55, and Adoption Elements #8, 26, and 28)

The options for recording “Hispanic/Latino Origin” on the FACTS screen do not include “no.” Also, it is not a mandatory field (i.e., the field is not required to be completed prior to saving the information). The program code will set this element to “no” if one of the nationality options for this field is not selected, resulting in a possible false “no” response. Since the field is blank, the blank field may mean a worker has not yet completed it, or did not gather this information. The State must add the option of “no” to the field. If the field is not completed, then the information is to be mapped to a blank in AFCARS.

In regard to the adoptive parent’s information in the adoption file, if the adoptive parent is either a “single male” or a “single female,” then the other must be set to “not applicable.” Currently, the program code maps these to blank instead.

- Child Disability Information (Foster Care Elements #10 - 15)

Kansas’ AFCARS data indicate an underreporting of this information. The frequencies for the 2007A data indicate that 19% of the children reported have a diagnosed condition that is reportable to AFCARS. Forty-one percent did not have a diagnosed disability, and 40% had the response “not yet determined.” The results of the case file review revealed that 43% of the records analyzed did not match what was reported in AFCARS. In the majority of cases, the AFCARS data indicated “not yet determined.” However, the reviewers did find information that indicated whether the child had a diagnosed condition or not. The AFCARS definition of “not yet determined” indicates that a “clinical assessment of the child by a qualified professional has not been conducted.” There were also five additional error cases in which the response was reported as “no,” but the reviewer found evidence of diagnosed conditions in the paper file.

The program code appropriately maps the State’s values entered into the system to the AFCARS values. However, if no data exist in the system, then AFCARS element #10 (has the child been diagnosed with a disability) is incorrectly set to “no.” Missing data are to be set to blanks in the AFCARS report.

Also, there is no start and end date associated with the diagnosed conditions entered into FACTS. Consequently, it is possible that a disability type entered into the system after the report period end date, and prior to a State’s extraction of the data, could result in a “yes” value for element #10, and the corresponding elements #11-15 reported as “applies.” Data submitted for each report period, or prior report periods, must reflect the information on the child at that time. Date fields need to be added in order to determine when the diagnosis occurs and, if applicable, when the condition no longer exists.

For AFCARS reporting purposes, the information reported for these elements reflects a child’s chronic and/or significant condition(s) diagnosed by a health care professional. 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>. The State should review this list and add conditions as appropriate.

The child's health status is an important part of the child's well being status, and is good information to be noted in a case plan. The State needs to address additional methods, or a new form, in order to record accurately the child's health conditions in a timely manner. During the case file review, it was noted that this information is not always in the child's paper file. The State may want to include in its case review process whether there is documentation from health care providers that indicates what the child's diagnosis is, and its associated date.

The State staff indicated they are working on a new error report to send out to the providers. Another option the State should consider is to create a report for the HSA's to use in order to follow-up with the provider agency if the child's diagnosis remains "not yet determined" after a set time (established by SRS).

- Removal Episodes (Foster Care Element #18 - 21, 56 and 58)

One issue identified with the reporting of JJA cases relates to when a youth returns home, but is on probation. The State is currently incorrectly reporting this as a "trial home visit." JJA must write the new extraction code to report these youth as "discharged" with a discharge reason of "reunification."

For children in the care and placement responsibility of either SRS or JJA, if the only placement at the time the agency removes the child, or is given responsibility for care and placement, is a hospital or a locked facility, the child is not part of the AFCARS reporting population. If the child never enters a foster care setting, then this child will never be reported to AFCARS. The dates of this episode will never be reflected in foster care elements #18 - 21. The State is incorrectly including these records in AFCARS. The State is to only include these records if the child is moved to a foster care setting. If the child goes from a locked facility, or a hospital, to a foster care setting, then the date of the placement is the start date of the child's removal episode (foster care element #21). This approach also applies to the JJA youth reported under the inter-agency agreement. It appears that JJA is starting the removal episode at the time the child was in a locked facility and including the locked facility in the placement count (foster care element #24).

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

When a child is in an in-patient drug or alcohol treatment center, these are entered as services and not as placements. The State needs to recode these in order to extract and include them for the placement information elements.

Also, the program code does not account for the length of time a child is hospitalized. Acute care stays are considered a brief absence from an ongoing placement. However, if the hospital stay is for other than acute care, then it must be included in the placement elements.

- Primary Basis for Determining Special Needs (Adoption Element #10)

There is a discrepancy between the number of records reported in this element as children determined to be special needs and element #35 (is child receiving an adoption subsidy).

Element #35 indicates there are 333 children receiving a subsidy. This element indicates there are 262 children determined as special needs. There are a couple issues that may be contributing to the inaccurate data for element #10.

One issue is the form does not contain a means to indicate the “primary” basis for determining special needs. Also, the form does not contain all the options that are present on the screen. Two of these conditions are “racial/original background” and the other is “medical conditions.” The State needs to clarify whether or not these are used to determine special needs in Kansas. Also, the form contains the options “guarded prognosis” and “developmental disability,” but the screen options do not.

Data Quality

Thirty-three percent of the data elements received a rating factor of three; 23 (35%) foster care and 11 (30%) adoption elements require improvements to the data quality. There are various causes of the reduced data quality. Some of the causes related to the need for technical changes either to program code or to the system. In some cases the data will significantly improve after the change is completed. However, the technical changes may also uncover additional data quality issues related to timeliness of data entry.

Forms/Data Entry

As noted in the above section, there are some areas where the option(s) for the FACTS field does not match with the information that can be recorded on the form(s). The State should review the options in FACTS to ensure that they are the most current and accurate choices.

Because there are instances in the child welfare field that children are abandoned, or in the case of Safe Haven Programs, the State will not have certain information on the birth parents, AFCARS options account for this by including the option “unable to determine” for certain elements. The State has a value “unknown,” and uses it when the information is not known because it is unavailable or not yet ascertained, and when a child has been abandoned. “Unknown” is always mapped to the AFCARS value “unable to determine.” This option is not to be used when the data are missing because the worker has not collected it, or otherwise is unknown.

One area related to this that the State should address is the collection of race information. Race information is to be self-identified by the client, or if the child is not age appropriate by his/her caretaker. Add language to the instructions for the forms clarifying the use of “unable to determine.” The State may want to have workers use the term “abandoned” for those instances where a child is abandoned through the Safe Haven program. The option “declined” could also be added in order to track when a parent, or caretaker, declines to provide the child’s race. Or, if the child is age appropriate, the child declines to provide his/her race information. For AFCARS reporting purposes, if an individual declines to provide race information, the value can be mapped to “unable to determine.”

The instructions for completing the face sheet do not explicitly direct caseworkers to indicate all races that are applicable. Errors in the case file review indicated that more than one race was not recorded for a child or an adult. Add instructions to the face sheet form that indicates the person filling out the form is to select all races that apply.

The State needs to ensure that workers are asking the question of clients, and updating this information as necessary. The State may want to consider making this a mandatory field after the investigation phase or up to 30 days after the removal from home occurs. Another option is to create a report for children that have been in care for thirty days and send the report to the private agency to verify the child's race. A check-box can be added to the Face Sheet labeled "race verified." A verified box could then be added to FACTS so SRS² can note that the race has been verified and is accurate.

In regard to the "actions or conditions associated with a child's removal" (foster care elements #26 - 40), there are three areas on the form for this information. There is a field for the "primary reason for removal," one for the secondary reason, and a list of 22 reasons. The case file review indicated a majority of the elements had errors where the data reported to AFCARS did not match what the reviewers found in the paper files. Many of the cases had additional circumstance associated with removal of the child from his/her home. The State staff indicated that only those reasons that appeared in the petition could be listed. However, even these reasons were not included in some of the records.

The State needs to address training for identifying all the reasons children are removed from their homes, and ensure that the forms are filled in completely. The State may want to consider removing these two fields and using the check box lists only. The worker can indicate the primary and secondary reasons with a "P" and "S" respectively then mark all others that apply. The State may want to include additional circumstances for removal, such as domestic violence, safe haven, and separate out the reasons for caretaker inability to cope.

Conclusion

The State has many good processes for reviewing the work of the provider agencies and ensuring good practice. The State needs to continue building on these practices to ensure that the AFCARS data accurately reflect the experiences of children in the Kansas foster care system. The State has an existing quality assurance system that is used to review cases. The State should build on this process by incorporating more of the AFCARS related information. Also, the State may want to consider adding reports for use by line workers and the HSAs, similar to those currently generated for managers. Two areas where reports reflecting the validity of the data could be used are on race and disability information. By increasing the type of information going back and forth in a feedback loop, there will be less chance of incomplete and/or inaccurate data being entered into FACTS.

As previously noted the AFCARS Assessment Review is a comprehensive analysis of the State's AFCARS data collection and reporting, and goes beyond the edit checks that must be met by a State in order to pass the compliance standards used on the bi-annual AFCARS submissions. As

² Social and Rehabilitative Services

a result, once the State makes corrections to its AFCARS data collection and extraction making the AFCARS report more accurate and reflective of the circumstances for the child, or of other issues related to practice, the State's semi-annual data submission may, as a result, fail to meet the data standards. 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 Children's Bureau. 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 the Children's Bureau. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

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 Children's Bureau with estimated due dates for completing the tasks. 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 Children's Bureau. Also, 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 its AIP, and the Children's Bureau has approved the changes and data, 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.