

Wyoming AFCARS Assessment Report

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Executive Summary

On August 27 - 31, 2001 staff of the Children's Bureau, ACF Region VIII, and the Office of Information Services (OIS) conducted an assessment review of Wyoming's Adoption and Foster Care Analysis and Reporting System (AFCARS). The AFCARS reporting period under review was October 1, 2000 through March 31, 2001.

There are two major areas that are assessed as part of an AFCARS assessment review. They are 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 is being entered and extracted, and the quality of the data submitted. Each of the 103 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.

Strengths identified by the Federal review team during the review include:

- ❑ The information system reflects the input provided by the field staff.
- ❑ The information system has several mandatory AFCARS fields.
- ❑ The State maintains high-quality system documentation.
- ❑ Management utilizes reports that are available to assess the accuracy of the AFCARS data.
- ❑ The State had a conversion plan to populate the new information system with data from the legacy system.

The State, however, does not fully meet the general requirements of the reporting population, specifically foster care, or the general technical requirements. There are two significant issues with the reporting of the foster care population. The State does not include the child welfare population that are adjudicated to the juvenile justice system and are still under the responsibility of the child welfare agency, with the expectation that once the child exits a detention facility he/she will return to a foster care setting. The State must continue to report on these children. The other issue pertains to children that are returned home while the agency maintains responsibility for care, placement, or supervision. If the child is returned home for a specified period of time, the State must continue to report the child for this time period. If the timeframe is not specified, then the State may consider the child discharged from care after six months of the return home for AFCARS purposes only.

Ten of the sixty-six foster care data elements fully met the AFCARS requirements. Eleven foster care elements did not meet the AFCARS standards, thirty-nine of the foster care elements require, at a minimum, system changes, and six elements require training for case workers and monitoring of the data to ensure improvement in the quality and accuracy of the data. In the adoption data set, fifteen out of thirty-seven elements fully met the AFCARS requirements,

seventeen elements require, at a minimum, system modifications, and three elements require training for caseworkers and monitoring of the data to ensure improvement in the quality and accuracy of the data. Once the program logic changes are implemented, the State will need to monitor caseworkers' data entry to ensure that the quality of the data improves.

The most significant issue with regard to the collection of the data elements pertains to the circumstances associated with a child's removal. There are fifteen circumstances listed in AFCARS on which the State must report. The State does not list all of the AFCARS circumstances associated with removal; instead, there are only six reasons listed on the input screen.

Another significant area of concern pertains to both the foster care and the adoption data elements. The State collects information related to a child's disability and the basis for determining if a child has adoption special needs on the same input screen. These are two separate types of information and the State needs to modify the system to collect this data separately. Currently, the disability information in the foster care population is under-reported. Additionally, for AFCARS purposes the disability must be clinically diagnosed.

An additional issue with the AFCARS data pertains to "historical" information. This includes information on a child's prior removal history, and information that precedes the implementation of a new statewide automated child welfare information system (SACWIS) by a State. In Wyoming's case, the State had a very good conversion plan and dedicated staff time to converting data from the legacy system. However, based on the findings from the case file review there is some data clean-up required on cases. Of concern is the fact that the extraction routine used to extract the data for the AFCARS file is excluding dates that occurred prior to 1997. It is possible that once this is corrected, the data for the "historical" data elements will greatly improve.

Lastly, although the program code used to map the State's data to AFCARS did not extensively use "defaults" (the mapping of missing data to a valid AFCARS codes), there are several elements with defaults that will need to be corrected. While this has allowed the State to avoid penalties that may otherwise apply, the data does not accurately reflect the circumstances of foster care and adoption in the State. The State must map all missing data to blanks and encourage caseworkers to keep the electronic case file up-to-date.

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 (See 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).

Within 30 days after the receipt of this report and the attached AFCARS improvement plan, State staff are requested to contact the ACF Regional Office to set due dates for completing the tasks in the improvement plan. Test cases will be provided to the State once all of the changes that are required to the information system have been 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. No further on-site reviews will be conducted unless information comes to the attention of ACF regarding the quality of the State's data, and it is determined that an on-site visit is necessary.

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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 process was developed. The AFCARS assessment review process primarily focuses on a State's information system's capability to collect, extract and transmit the AFCARS data to the Administration for Children and Families (ACF) accurately in accordance with the AFCARS requirements in the Federal regulation and policy issuances. A second focus of the AFCARS review is to assess the State's child welfare staff's ability to collect and document information accurately 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 provides guidance on improvements that can be made to the system, and changes to the program code used to extract the AFCARS data.

Each assessment review consists of a thorough analysis of the State's system program 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. By doing this, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

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 may be penalty-free, but does not have accurate, reliable, and quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population for the correct time period required by the regulations.

Information collected from each of the components of the assessment review is combined to rate each data element. The general requirements are also 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. The following chart lists the factors that were used for the analysis of the State's AFCARS:

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 will be 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 this case, the element will be given a “2” to denote the need for the system logic to first be modified. Once the corrections are made to the system, then the data needs to be re-analyzed. If it appears problems related to case worker training or data entry still exist, then a “3” will be assigned to the requirement. A finding of a 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 be assessed as fully satisfying 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 have a direct relationship with each other. When this occurs, all related elements are given the same rating factor. This is 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 found 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 should implement the AFCARS improvement plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

Two major areas are assessed during an AFCARS assessment review. These are 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.

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 each of the foster care and adoption data elements, the general AFCARS requirements, and the case file review. The AFCARS reporting period under review was October 1, 2000 through March 31, 2001 (2001A).

Strengths

Strengths identified by the Federal review team during the review include that:

- ❑ The information system reflects the input provided by the field staff.
- ❑ The information system has several mandatory AFCARS fields.
- ❑ The State maintains high-quality system documentation.
- ❑ Management utilizes reports that are available to assess the accuracy of the AFCARS data.
- ❑ The State had a conversion plan to populate the new information system with data from the legacy system.

Based on the analysis of 64 foster care and eight adoption paper case files, a significant amount of the data in the AFCARS report matched the information the reviewers found in the paper file. However, there were several errors in the areas of a child's removal history and placement information. One significant finding of the case file review was the lack of information related to foster parents. There were several records that indicated the foster care placement setting was a "family foster home", but the foster parent information was blank in AFCARS. The State staff believe that the lack of foster parent information may be partially due to the information not being reported to AFCARS on cases participating in the Casey Family program.

General Requirement Errors

Reporting population: Foster care population (Factor: 2)

The State is not submitting the complete foster care population as defined in the AFCARS regulation and policy issuances. For AFCARS purposes, a removal episode is defined as the time from the child's removal from the home (for more than 24 hours) until the child is no longer under the care and placement, or supervision of the State agency. This includes the time during which the child is returned home and the agency still has custody of the child, regardless of whether post-reunification services are being provided.

The State is not reporting children to AFCARS if they are returned home while the agency still has responsibility for the care, placement, and supervision of the child. The State must continue to report these children to AFCARS for the time specified of the return home. If no duration of time has been specified, the State is to continue reporting the child for six months after the return, then the State can enter the case as "discharged" for AFCARS purposes. (See Child Welfare Policy Manual, AFCARS, Section 1.3.)

The State also is not reporting those children that were in foster care and then adjudicated to the juvenile justice system, with the intention that the child will return to foster care. The State must continue reporting the child to AFCARS and include the current placement setting. (See Child Welfare Policy Manual, AFCARS, Section 1.3.)

Technical Requirements (Factor: 1)

- Century Date

The State uses a "rule of 35" to create the four digit year. If the number is less than 35, the default is 2000. If is greater then 35, then the default is 19 for the century. The State needs to clean up the data in the system and ensure that all year dates are entered as four digits.

- Conversion

The State did have a conversion plan and committed a considerable amount of time and resources to cleaning up the data that was brought over from the legacy system. However, the extraction logic excludes dates that occurred prior to 1997. This is having a negative impact on a significant number of cases with regard to the date of first removal, the number of removals from home, and the date of discharge from a previous removal episode. There may also be other data elements pertaining to dates that are being affected by this program logic. The State will need to re-extract the data, after the change is made to the program code, to ensure that all of the dates are correct.

Statewide Automated Child Welfare Information System (SACWIS)

Some of the recommendations and required changes to the system could result in the State needing to submit an update to its Advanced Planning Document, especially if the changes result in a significant commitment of resources, change in scope, or a change in schedule. The State should coordinate the findings and changes required from the AFCARS review with its response to the SACWIS Assessment Review Findings.

Data Element Errors

Fifty-nine percent (39) of the foster care and fifty-one percent (19) of the adoption data elements require system modifications. Once the program logic changes are made, the State will need to monitor caseworkers' data entry to ensure that the quality of the data continues to improve.

Also, note that the changes made to the system with regard to data entry will inevitably result in improving the quality of data. It may also correspondingly result in the State's semi-annual data submission not meeting the missing data standard. In order to ensure that the data are complete, the agency will need to require workers to enter the data, and assess the validity of the data prior to submitting it to ACF. This can be accomplished by utilizing the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility.

- Has the Child Ever Been Adopted, and at What Age (Factor 1, Number of elements affected: 2)

The State's information system, Wyoming Children's Assistance and Protection System, (WYCAPS), does not capture this information. The State is currently reporting the child in an adoptive placement. The question pertains to whether the child had ever been previously adopted prior to the current removal episode. The purpose of this element is to determine how many children are entering foster care as a result of a disrupted or dissolved adoption.

- Circumstances Associated with Removal (Factor: 1 and 2, Number of elements affected: 15)

There are 15 circumstances associated with removal that the State is to collect. The State is currently collecting information for six of the circumstances, but is required to collect information on all fifteen of the circumstances associated with removal. One of the findings of the case file review was that there were other reasons, including drug abuse by a parent, that contributed to the child's removal from home and were not being collected in WYCAPS.

Also, the six circumstances that are collected require system modifications because the system permits the information to be updated anytime after a child has been placed in foster care. For AFCARS purposes, the information requested is only that which was known at the time of the child's removal from home.

Another problem with the collection of this information pertains to voluntary placement agreements. The agency does not require workers to enter the circumstances associated with removal for voluntary placements. The State must start collecting this information.

Once these changes are implemented, workers may need to be reminded to select all categories that apply.

- Race Information (Factor: 2, Number of elements affected: 6)

There is a mapping problem in the AFCARS extraction code. All children and adults that are marked as “white” in WYCAPS are being reported to AFCARS as “Native Hawaiian or other Pacific Islander.” The State staff corrected this error during the on-site review.

- Information on Children Diagnosed with Disabilities (Factor: 2, Number of elements affected: 6)

In the foster care data set, element #10 asks if the child has been clinically diagnosed with a disability. If the response is “yes,” then some or all of the applicable disability categories (medical condition, mental, physical, emotional disability, or other medically diagnosed condition) may be selected. There are several problems with the collection of this information. The primary problem is that this information is being collected on the same screen as the special needs adoption information. Because of the way the screen is designed, disability information is probably under-reported and the information is misleading. If none of the options pertaining to disabilities are selected, the program code maps the “missing information” to “no.” The State’s definition of “no” is not the same as AFCARS. The State uses “no” to mean that an evaluation has not been conducted. Also there is not an option of “not yet determined” for the workers to select. The AFCARS definitions of these terms are:

Yes – Indicates that a qualified professional has clinically diagnosed the child as having at least one of the disabilities listed.

No - Indicates that a qualified professional has conducted a clinical assessment of the child and has determined that the child has no disabilities.

Not Yet Determined – Indicates that a clinical assessment of the child by a qualified professional has not been conducted.

According to the frequency for foster care element #10, 76 percent of the records submitted indicate that the child does not have a disability. The State staff related that this number is too high and the number reported as having a disability (24%) is low.

The program logic can only extract the data from the selection list on the screen. However, there is a text field “other” that workers can use to enter medical/disability information that is not on the list. This is probably also contributing to the under-reporting of information.

The State needs to re-design the way it is collecting this information, eliminate the “other” option and include more medical/disability conditions on the selection list. Tab C contains an AFCARS resource list of medical conditions and how they should be mapped to AFCARS.

- Foster Parent Information (Factor: 2, Number of elements affected: 6)

There were a significant number of records in the case file review that had missing information in the AFCARS report. This seems to reflect that workers are not entering the information or it may be that the program code is not extracting the data from the correct place in the system. The State will need to further evaluate this problem and correct it.

Data Quality

In addition to the changes needed in the program code, there are significant issues related to data quality. Primarily, there is a data entry issue and a lack of system use by the workers. There is also a need for additional training for caseworkers on how to use the system. This will require ongoing monitoring by supervisors.

CONCLUSION

In summary, the State must modify the system to collect all of the AFCARS foster care elements, and extract the full foster care population. Additionally, the State needs to modify the extraction program code by removing the default settings. The State must map all missing data to blanks and encourage the workers to keep the electronic case file up-to-date. This will provide data that is not misleading or inaccurate. There are several areas that can be addressed with training and instruction to workers on the correct entry of information. The areas that require system changes will also require caseworker training.

Tab B contains the AFCARS Improvement Plan. The plan contains the AFCARS general requirements and the data elements that have been determined to not meet the requirements in the Federal regulation. Each has a matrix that contains a column for the task, the date the task is to be completed, and one for comments.

Within 30 days after the receipt of this report and the attached AFCARS Improvement plan, State staff are requested to contact the ACF Regional Office with proposed timeframes for implementing the improvement plan. The State and the ACF Regional Office (in conjunction with the Children’s Bureau) will discuss the completion dates outlined by the State and negotiate the final due dates. The State should provide written quarterly updates to the Regional Office. Additionally, the State workplan 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 Federal regulations at 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The State should contact the ACF Regional Office once it has completed the changes to the system. 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 extracted test data file will be arranged with the ACF Regional Office and OIS.

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, the AFCARS Improvement Plan will be considered finished. Once all tasks, and if necessary revisions based on the test cases, have been completed the State should submit the completed improvement plan to the ACF Regional Office. The State will receive a letter summarizing the final results of the review. No further on-site reviews will be conducted unless information comes to the attention of ACF regarding the quality of the State's data and it is determined that an on-site visit is necessary.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and will be provided to the extent available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's National Resource Center for Information Technology in Child Welfare (NRC-ITCW). The Resource Center can be contacted at (877) NRC-ITCW (672-4892), or at its web page: <http://nrcitcw.org>. If you wish to request on-site technical assistance from the NRC-ITCW, contact your ACF Regional Office.