

AFCARS ASSESSMENT REVIEW FINDINGS: General Requirements

State: Montana

AFCARS Reporting Period: October 1, 2007 – March 31, 2008 (2008A)

No.	Requirement	Findings/Notes	Rating Factor
Foster Care Population			
1	<p>Must include all children in foster care for whom the State title IV-B/IV-E agency has responsibility for placement, care, or supervision (45 CFR 1355.40(a)(2)).</p> <p>All children in foster care under the responsibility of the State agency administering or supervision the administration of the title IV-B Child and Family Services State plan and the title IV-E State plan; that is, all children who are required to be provided the assurances of section 422(b)(8) of the Social Security Act (the Act) (Appendix A – SECTION II).</p>	<p>The Department of Public Health and Human Services (DPHHS) is the title IV-B/E designated single State agency. It includes both the Division of Child and Family Services (DCFS) in addition to the Division of Mental Health. The State staff indicated that the Department does not receive responsibility for the placement and care of children under the care of the Division of Mental Health.</p> <p>The Department of Corrections (DOC) is a separate agency. It used to be a division in DPHHS but became a separate Department in 1997.</p> <p>The State team indicated there is a need to provide additional and ongoing training in regard to entering data on those children/youth that are in joint custody of this agency and another agency.</p> <p>The State is incorrectly including the child of a minor parent that is in foster care when the child lives with the minor parent. The child would only be reported if the child was removed from the minor parent and placed in a different foster care setting.</p> <p>The extraction code does not specifically exclude nor include records for children whose only placement is a hospital or locked facility. The State explained that those two living arrangements are recorded as status changes and not placements. Because the extraction logic is based on placement data, children in these two scenarios will correctly not be reported in AFCARS.</p> <p>When developing the new information system, the State needs</p>	2

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		to specifically address how it will design the system as a case management system and not as a payment system. The system needs to be able to track that a child is in the agency's responsibility for placement and care at all times and to show where the child is residing (e.g., foster home, group home, as well as locked facilities or hospitals) 24/7/365.	
2	All children supervised by or under the responsibility of another public agency with which the title IV-B/E agency has an agreement under title IV-E and on whose behalf the State makes title IV-E foster care maintenance payments (Appendix A - SECTION II).	<p>DPHHS has an agreement with the Department of Corrections. The program code reports all children who were clients of DOC and who received a title IV-E subsidy.</p> <p>The DOC workers use CAPS to record information on their clients. The State staff indicated that MACWIS will also be used by the DOC workers. The State is considering creating a separate module for their use. Some States have used "service codes" or some other type of population code to identify which program a child is associated with and these codes are used for inclusion or exclusion in the AFCARS selection logic for the reporting population.</p> <p>The State does have title IV-E agreements with Tribes (Fort Peck reservation - the State provides services, but uses Tribal court.) The other six Tribes are under the responsibility of the Tribe and provide the data to DCFS for AFCARS reporting. The Tribes' staff have access to CAPS. The Tribes do not have information systems. The State team indicated that the one or two Tribes interested in direct funding would likely still have an agreement with DPHHS to use CAPS.</p>	4
3	Includes American Indian children covered under section 422(b)(8) of the Act, on the same basis as any other child (45 CFR 1355.40(a)(2)).		4
4	For children in out-of-State placements, the State placing the child submits and continually updates the data (45 CFR	The program code correctly excludes children whose county code of financial responsibility indicates "out of State."	4

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	1355.40(a)(2)).	CAP07479 LN 950.	
5	Includes all children who have been in foster care at least 24 hours (Appendix A - SECTION II).	The program code excludes children that were out of their homes for less than 24 hours by not extracting records for children whose only placement in an episode was less than 24 hours. The State may want to consider adding a clock function to the physical removal and discharge fields.	4
6	Does not include children who are in their own homes under the responsibility of the State agency (Appendix A - SECTION II).		4
7	Include all children who are in the placement, care, or supervision responsibility of the title IV-B/E agency that are on “trial home visits” (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population).		4
8	Includes youth over the age of 18 if a payment is being made on behalf of the child (Child Welfare Policy Manual, Section 1, AFCARS).		4
Adoption Population			
9	Data are required to be transmitted by the State on all adopted children who were placed by the State title IV-B/IV-E agency, and on all adopted children for whom the State agency is providing adoption assistance (either ongoing or for nonrecurring expenses), care or services directly or by contract or agreement with other private or public agencies. (45 CFR 1355.40(a)(3)). Report on all children adopted in the State during the reporting period and in whose adoption the State title IV-B/IV-E agency has had any involvement. All adoptions after 10/1/94 that meet the criteria below must be reported. <ul style="list-style-type: none"> • Children who had been in foster care under the responsibility and care of the State child welfare agency and who were subsequently adopted whether special needs or not and whether subsidies are provided or not 		4

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	(Appendix B – Section II, paragraph (a)).		
10	<p>Report on all children adopted in the State during the reporting period and in whose adoption the State title IV-B/IV-E agency has had any involvement. All adoptions after 10/1/94 that meet the criteria below must be reported.</p> <ul style="list-style-type: none"> • 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. • Children adopted for whom an adoption assistance payment or service is being provided based on arrangements with the State agency. (Appendix B – Section II, paragraphs (b) and (c)). 	The Medicaid only subsidy adoptions from private agencies may not be getting entered into CAPS.	3
11	For children adopted out-of-State, the placing State reports the adoption data (45 CFR 1355.40(a)(3)).		4
12	Voluntarily reports on all other adoptions. (Appendix B – Section II).		
Technical Requirements			
45 CFR 1355.40(b)(2)			
13	For foster care information, the child-specific data to be transmitted must reflect the data in the information system when the data are extracted.		2
45 CFR 1355.40(b)(3)			
14	Adoption data are to be reported during the reporting period in which the adoption is legalized or, at the State’s option, in the following reporting period if the adoption is legalized within the last 60 days of the reporting period.	Montana currently uses the adoption finalization transaction date, or the date that the adoption finalization date is entered into CAPS, as the extraction criteria for the AFCARS Adoption file. By using this method it appears that Montana is correctly reporting all finalized adoptions.	4
Appendix A, 45 CFR 1355 Foster Care Data Elements and Appendix B, 45 CFR 1355 Adoption Data Elements			
15	State uses sequential numbering of the case record number or		4

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	encrypts the record number.		
Appendix C, 45 CFR 1355 Electronic Data Transmission Format			
16	Data file must be in ASCII format.		4
17	Elements must be comprised of integer (numeric) value(s).		4
18	All records must be a fixed length.		4
19	Inform the Department, in writing, of the method of transfer intended to be used by the State.		
Appendix D, 45 CFR 1355 Foster Care and Adoption Record Layouts			
20	Report the status of all children in foster care as of the last day of the reporting period (Section A.1.b(5)).		4
21	Provide data for all children who were discharged from foster care at any time during the reporting period, or in the previous reporting period, if not previously reported (Section A.1.b(5)).		4
ACYF-PI-CB-95-09, Reissued May 23, 1995 Technical Bulletin #13, AFCARS File Extraction			
22	State extracts all records based on the transaction date of discharge or the date of latest removal (foster care element #21), if the child has not been discharged.	The extraction code extracts the foster care records based on placement exit transaction dates, placement exit dates and placement start dates. Since CAPS is based on placements, the resulting set appears to contain all the required records, despite not being based on transaction date of discharge. However, for the development of MACWIS, this approach will need to be revised to reflect removal episodes and the extraction code modified accordingly. (Also, refer to the NRCCWDT's TA report.)	3 4
Technical Bulletin #2, File Format			
23	State must use correct file name for transmission.		4
Data Quality - Conversion			
24	State transferred historical information on open cases. Specifically, it included information on: date of first removal, total number of removals, and whether the child's mother was married at the time of the child's birth. If the case was open at	The State's CAPS system has been operational for more than ten years. Issues with converted records appear to have been resolved.	4

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	the time of conversion, information on the number of placement settings was included.		
25	The information system has the capability of recording historical information. This should apply to both open cases in which historical information must be entered, and for closed cases that re-open after conversion and must be entered into the system.		4
Data Quality - Subsequent Submissions			
26	The data must be reflective of the time period being submitted, not new information applying to a different time frame.	The system does not store all historical foster care information. Overwritten data in the State's system will produce subsequent data file submissions with data not reflective of the reporting period. (Examples: case plan goals, diagnosed disabilities, terminations of parental rights.) The State faces significant challenges when submitting subsequent files, to report data reflective of the time period and not reporting data reflective of a future time period. However, removal and placement data will likely be accurately reported.	2