



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
Administration on Children, Youth and Families
1250 Maryland Avenue, S.W.
Washington, D.C. 20024

August 7, 2012

Mr. David E. Wilkins
Secretary
Florida Department of Children and Families
1317 Winewood Boulevard
Tallahassee, Florida 32399-0700

Dear Mr. Wilkins:

The Children’s Bureau, in collaboration with the Florida Department of Children and Families (DCF), completed a review of Florida’s Adoption and Foster Care Analysis and Reporting System (AFCARS) data during the week of February 6, 2012. The final report on the AFCARS Assessment Review (AAR) is enclosed, which includes the AFCARS Improvement Plan (AIP).

We appreciate the amount of time and effort that your staff committed to the planning and implementation of the AFCARS Review. Every member of the State team was fully engaged during the review and ensured that the week went smoothly. We appreciate the work that each member put into preparing for the onsite review.

The AAR evaluates two areas: the AFCARS general requirements (reporting populations and technical standards) and the data elements (foster care and adoption). Information collected on these areas is combined and based on an analysis of the findings a rating factor is assigned to each of the general requirements and each data element. The rating factors are: “1,” the information is not collected and/or is not transmitted to ACF; “2,” technical corrections are required; “3,” improvement in data quality is needed; and “4,” the State fully meets the AFCARS standards. The enclosed report provides a more detailed explanation of each of the rating factors. The State team should carefully review all the findings in each document as there have been some changes from the onsite findings. Below is a chart depicting the State’s rating factors.

General Requirements (22)

Rating Factor	Foster Care (8)	Adoption (3)	Technical (11)
4	5	3	9
3	1	0	0
2	1	0	2
1	1	0	0

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	20 (30%)	12 (32%)	32 (31%)
3	16 (24%)	5 (14%)	21 (20%)
2	30 (46%)	20 (54%)	50 (49%)
1	0	0	0

With respect to the General Requirements findings, the State is, in general, submitting data for the correct foster care and adoption populations. However, it is an AFCARS requirement that States include in the foster care reporting population children supervised by or under the responsibility of another public agency with which the title IV-B/IV-E State agency has an agreement under title IV-E and on whose behalf the State makes title IV-E foster care maintenance payments. Florida DCF does have an interagency agreement with the Florida Department of Juvenile Justice but the children who are covered by the agreement are not included in the State's AFCARS file. These children must be included.

Additionally, the State is incorrectly including in the foster care file those children who are in the agency's responsibility for placement and care but whose only placement is a hospital or locked facility. These records must be excluded from the reporting population.

In regard to the data elements, many of the technical corrections will affect multiple data elements because the correction is to a field that populates several AFCARS elements. One example of this is the manner in which the State's system is designed to collect ethnicities. The field "Hispanic/Latino Origin" is populated from the "Ethnicity" field. However, the ethnicity field is a single-select field and if the child is of multiple ethnicities, it is possible that the response for "Hispanic/Latino Origin" will be incorrectly reported. An example of this was demonstrated during the system demonstration when the child in the scenario was Italian and Hispanic. Since the system only allows one value to be entered, information on the child's ethnic background will be lost. If the caseworker selects Italian, then the Hispanic field will be incorrectly set to "no."

Another area that needs to be corrected is the method the State uses to report the AFCARS disability information. There are two areas in the system where a child's diagnosed conditions are recorded. There is a field on the Person Management screen that collects whether the child was diagnosed with a disability. If the answer is yes, the caseworker selects all of the following that are applicable: mental retardation, visual/hearing impaired, physically disabled, emotionally disturbed, other medically diagnosed conditions requiring special care, and learning disability. The system also has another more comprehensive section of the system where more detailed information about a child's health status is recorded; the Medical/Mental Screen. The State's 2011B data file indicates there are only 1,834 (7%) children with a health/mental health condition that is reportable to AFCARS. The case file review revealed that 21% of the records analyzed indicated the child did have a diagnosed disability, but the response in AFCARS indicated the child did not have a condition reportable to AFCARS. This indicates that the fields used to report this information to AFCARS are not being used by the staff. It is important to note that the Community Based Care (CBC) agencies employ health professionals to maintain the Medical/Mental Health screens. Consequently, the information on this screen is likely to be more accurate than the general categories of health data recorded in the Person Management module by staff without health expertise. The State must modify the program code to select the data for these elements from the Medical/Mental Health screen.

One area in the adoption file that needs to be addressed is the inconsistency in the reporting of children who receive an adoption subsidy (adoption element #35) and the number of children reported as having been determined special needs by the agency (adoption element #9). The data indicate there are 1,525 (99%) children who were adopted in the report period ending September 30, 2011 who are receiving an adoption subsidy. Adoption element #9, has the agency determined special needs, indicates there are 1,251 (82%) children who were determined to have a special need. The number reported for element #9 must not be less than the number reported for element #35 because any child receiving a State or title IV-E adoption subsidy must be identified as special needs. There were several reasons that the review team identified as the cause of the underreporting. One is that the area used to collect the information related to whether or not a child has a special need is also the area used for placement purposes and is not linked to the screens that are used to determine a child's eligibility. The State needs to consolidate the eligibility factors into one location.

Another issue identified in the reporting of the adoption data is that the State is incorrectly reporting all adoptions as those that were placed by DCF and none as a private agency (adoption element #34, adoptive child was placed by public agency, private agency, tribal agency, independent person, or birth parent). The program code automatically reports all adoptions as "public agency." While it may not occur frequently, the State does provide adoption assistance for children who were placed by a private agency (not under contract with DCF) for adoption. In these instances, the records are to be reported as "private agency." This reporting has implications for the accurate determination of whether the State receives an adoption bonus.

Due to corrections that are needed for the foster care elements, the State will have to resubmit AFCARS data for past report periods. The State and the Children's Bureau will discuss which reports will be required for resubmission.

The agency is encouraged to incorporate a review of its AFCARS data as well as other data as part of the periodic reviews conducted for children in foster care. Also, the agency should incorporate a review and analysis of the data as part of its quality assurance process. It is important that the information being used not only for AFCARS reporting but for the agency's own performance measures and other program evaluations is reliable, consistent, and accurate.

Within 30 calendar days after the receipt of this report and the attached AIP, the State staff must submit the AIP electronically to the Children's Bureau with estimated due dates for completing the tasks in the AIP. An electronic copy of the final matrices will be e-mailed to your staff. Once the Children's Bureau and the State agree that the quality of the data has improved, and all tasks and revisions to the extraction code have been reviewed and approved, the State will receive a letter summarizing the final results of the review. 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 Child and Family Services Plan and Annual Progress and Services Report as part of the information required by 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5).

The Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AIP. The State may obtain technical assistance from the Children's Bureau's Network of Training and Technical Assistance Centers.

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

Sincerely,

/s/

Joseph J. Bock
Acting Associate Commissioner
Children's Bureau

Enclosures

cc: Pete Digre, Deputy Secretary, Florida DCF
Patricia Armstrong, State Director, Office of Child Welfare, Florida DCF
Sallie Bond, Policy Chief, Office of Child Welfare, Florida DCF
Eleese Davis, Chief of Quality Assurance, Office of Child Welfare, Florida DCF
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