

**FLORIDA
AFCARS
Assessment Review
Report**

July, 2012

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

TABLE OF CONTENTS

Background	1
Rating Factors	2
Findings	4
General Requirements	4
Data Elements	6
Data Quality	9
Tab A Detailed Findings	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	
Section 3: Case Files	
Tab B AFCARS Improvement Plan	
Section 1: General Requirements	
Section 2: Foster Care and Adoption Elements	

BACKGROUND

Federal law and regulations require title IV-E agencies operating programs under title IV-E of the Social Security Act (the Act) to submit data to the Adoption and Foster Care Analysis and Reporting System (AFCARS). The data are to be collected on children in foster care and those who have been adopted with title IV-E agency involvement. Title IV-E agencies that fail to meet any of the standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial noncompliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E Plan¹. Additionally, title IV-E agencies 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 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 title IV-E agencies to develop child welfare information systems and to collect quality data. To this end, SACWIS and AFCARS Assessment Reviews 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. All title IV-E agencies will undergo an AFCARS Assessment Review (AAR) regardless of whether an agency operates a SACWIS. The title IV-E agency's information system is assessed against the AFCARS requirements in the Federal regulations, policy issuances, and the AFCARS Technical Bulletins. The AAR evaluates the agency'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 title IV-E agency in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a title IV-E agency meets all of the AFCARS requirements and examines the quality of its data. Additionally, while the review is an assessment of the title IV-E agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to agency staff.

Each AAR consists of a thorough analysis of the title IV-E agency'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 agency's team to gain a better understanding of the agency's child welfare practice and policy and agency staff's understanding of the data elements. The data are also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the agency's data conversion process (if applicable) and understanding of the information reported to AFCARS is tested.

¹ 45 CFR 1355.40(e)

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 for overall data quality, to determine whether the title IV-E agency is meeting the AFCARS definitions for the information required, and to determine whether the correct data are being entered and extracted.

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 timely entry of certain data elements, and for whether the data meets a 90 percent level of tolerance for missing data and internal consistency checks. However, “substantial” compliance does not mean a title IV-E agency has fully implemented the requirements in the regulations. This explains why an agency formerly may have been “penalty-free,” and yet does not have accurate and reliable quality data. For example, edit checks of the data cannot determine whether the title IV-E agency submitted the correct foster care population required by the Federal 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. Exhibit 1 is a chart that lists the factors that were used for the analysis of the title IV-E agency’s AFCARS.

For data elements and general requirements that do not meet existing AFCARS standards (rating factors 0 through 3), the agency is required to make the corrections identified by the review team. It is possible that the problem with a data element 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. 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.

The agency 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/Tribal levels, the title IV-E agency must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

AFCARS Rating Factors

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. • There is incorrect data entry due to training or design issues. • There are 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. • 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	An AFCARS requirement(s) has not been implemented in the information system. For example: <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	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.

FINDINGS

During the week of February 6, 2012, the Children's Bureau conducted an AAR of the Department of Children and Families (DCF). This section contains a summary of the significant reporting and data quality issues that were found during the AAR. As part of the post-site visit analysis, the State's documents, data, the case file review findings, and the onsite notes were assessed to make the final determination of findings. The State should carefully review all the findings in each document as there have been some changes from the onsite findings. For additional information on specific issues for the general requirements and the data elements, please see the attached matrices. The charts below summarize the rating factors for the General Requirements and the Data Elements. Tab A contains the detailed findings for the general requirements, the data elements, and the case file review. If as a result of the post site-visit analysis of the State's information the rating factor changed from the preliminary on-site rating, the original is marked out and the new rating is included.

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

General Requirements

The General Requirements refers to AFCARS requirements related to the foster care and adoption reporting populations, the technical requirements of the AFCARS file, as well as items related to overall data accuracy and integrity.

Information System

The State's SACWIS, Florida Safe Families Network (FSFN) is a transfer of the Wisconsin SACWIS eWiSACWIS system. Other States that have also implemented this system and had an AFCARS Assessment Review are: Alaska, Washington, and New Jersey. Overall, this system appears user-friendly and robust in the type of information that it has the capacity to collect. There are modifications that will need to be made to FSFN that have been noted in prior reviews of this system. One is related to the health and mental health screen and the accurate reporting of the health characteristics to AFCARS. Another screen modification relates to where the agency collects information on whether the mother was married at the time the child being reported in the adoption file was born. These changes are discussed further in the next section.

Foster Care Reporting Population

Title IV-E agencies are to include the records of children who are in foster care under the agency's responsibility for placement and care. The State's method of selecting the foster care reporting population includes all records in which there is an out-of-home placement. While this approach is a good first step, it also results in records being included in the AFCARS reporting population that should not be included. The situations that are being incorrectly reported are:

- Children whose only placement is a hospital setting or a locked facility; and,
- Children who are removed from one parent and directly placed with the other (non-custodial) parent.

The extraction code will need to be modified to exclude these records from the AFCARS foster care reporting population by checking what the child's living arrangement is initially. If the program code finds that the child's initial placement is a locked facility, a hospital, their own home, or the home of a parent, then it would skip this record. If the child were then placed subsequently in a foster care setting, the program code would then identify this child as part of the foster care reporting population. Below in the section addressing removal episodes additional information is provided on how this situation is to be treated for AFCARS reporting purposes.

The foster care population is also to include the records of 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 Department of Children and Families has an inter-agency agreement with the Florida Department of Juvenile Justice. However, the State is not including the records of youth that are covered by the inter-agency agreement in its AFCARS foster care population. This is the reason the State received a rating factor of "1" for the foster care reporting population. There is no means to collect and report this data.

Adoption Reporting Population

The State is correctly including all records of children adopted from the State's child welfare foster care system. The State also correctly includes records of children who were adopted by a family residing in Florida and the adoption was handled by a private agency, both in-State private agencies as well as out-of-State agencies and for whom DCF has an adoption agreement for services and/or a subsidy.

There is a possibility though that some adoptions may not be getting reported due to a technical issue in the program code. If an adoption finalization occurs towards the end of a report period and is not entered prior to the report period being submitted, it is never reported in the next report period. A flag or some other means needs to be implemented to ensure all adoptions are reported.

Data Elements

There were several elements, as noted in the above chart, which require some type of technical correction. Many of these involve mapping the State's values to the correct AFCARS value or remove a default setting. The program code incorrectly sets an AFCARS element to a valid value when there is no information in the information system.

Race and Ethnicity (Foster Care Data Elements #8, 9, 53 – 55 and Adoption Data Elements #7, 8, 25 – 28)

There is an issue with the design of these fields on the Person Screen. This was also an issue found during the Washington State AFCARS Assessment Review. First, there are nationalities collected in the Ethnicity field that are also considered race for the purpose of Federal reporting. If one of these are selected by the caseworker, the extraction code that constructs the AFCARS data file does not check the ethnicity field for these races. This could result in potentially underreporting the number of individuals for a particular race or the number of individuals who are multi-racial. Also, if a person's background includes more than one ethnic group, for instance Hispanic and Italian, the caseworker can only enter one ethnicity in the field "Ethnicity." If the worker were to enter Italian, then the field "Hispanic/Latino Origin" is populated as "no." This field is not a user entry field; it is linked to what is entered in the field "Ethnicity." If the State is interested in knowing the ethnic background of an individual, then the "Ethnicity" field needs to be multi-select and the "Hispanic/Latino Origin" field needs to be delinked from the "Ethnicity" field and become a field for which the caseworker can select the response. Or, it still can be linked and depending on whether an ethnicity that is considered "Hispanic/Latino" is selected, it would continue to set the "Hispanic/Latino Origin" field as applicable. This approach will still require making the "Ethnicity" field multi-select options list.

Diagnosed Disability Information (Foster Care Data Elements #10 – 15)

For AFCARS reporting purposes, the information reported for these elements reflects health, mental health, and behavioral health conditions that the child may have. A resource list of conditions and how they are mapped to AFCARS is included in AFCARS Technical Bulletin #2. (The document is not an exhaustive list but only examples.)

Florida's AFCARS data indicate an underreporting of this information. The frequency distribution for the data reported in the 2011B report period indicates that 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% (16 out of 75) 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.

There are several factors contributing to the underreporting of this information. The most significant one is how the system is designed. There are two sections of the system that case workers complete related to the health of a child. One is on the "person management" screen. Here the system contains the AFCARS question with the same responses as in AFCARS. There also is a "Medical/Mental Health" page that records exam dates and diagnosis. The medical

profile page documents medications, Axis I and II Diagnoses and other medical information. This section captures more robust information for the reporting of diagnosed disability information than the fields on the “person management” screen.

The medical profile is a good section in the system for recording the health and mental health conditions of a child. This section would allow for the recording of the actual diagnosed condition, which then can be mapped to the appropriate AFCARS category. This would provide more accurate data because then the case worker would not have to guess which category a diagnosis belongs to. Currently, the diagnosis fields on the medical profile screens are not captured in a database table, they are only text fields. These should be stored in a table for reporting purposes. 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.

Removal Episode Information (Foster Care Data Elements #18 – 21, #56 and #58)

The State is incorrectly reporting the removal date for certain cases. For AFCARS reporting purposes, if the child’s first living arrangement was one that is outside the scope of foster care and the child subsequently moves to a foster care setting, the removal episode start date is the start date of the foster care living arrangement. This date would always be considered the start date of the removal episode. An example would be a child who is in the hospital and while there the agency receives a court order that gives the agency responsibility for placement and care. Since the child is in the hospital at the time, this record does not meet the requirements for the foster reporting population (see above section on the foster care reporting population). At the time the child is discharged from the hospital, the agency places the child in a foster home. The date the child enters the foster home is the date that is to be reported for foster care element #21, date of latest removal. The State’s program code incorrectly extracts the date the child entered the hospital or locked facility as the removal date. The State will need to modify the extraction code to extract the date the child is placed in a foster care setting. There are additionally changes that must be made to the extraction code to account for this episode date if the child were to exit foster care and then again re-enter at a later time (foster care data elements #18, 19 and 20). The same logic also applies to children that may have been initially placed with a non-custodial parent and then enters a foster care setting.

Agency staff indicated that they do not have a practice of children being placed back in their own home while the Department still has responsibility for care and placement. However, findings from the case file review indicate this does occur. If the agency’s responsibility for placement and care is not dismissed by the court at the time the child is placed back in his/her own home, then this is to be reported as a change in placement and not a discharge from foster care.

Placement, Dates, and Counts (Foster Care Data Elements #23, 24, 41)

The State team shared that the values used for placement settings vary by each Community Based Center (CBC). The design is tailored to each service agency’s catchment area and the types of facilities they have available. The State team indicated that the broader *service*

categories are standard across the State. Within those categories the CBCs can define their own service types. This is a good approach. However, one issue identified as a result of the evaluation of the extraction code is that if certain service types were the first “placement” the program code will include these records and set the placement date as the same date as the removal date. However, some of the values the program code is checking appear to be actual services and not something that would be a placement. These are: “206, respite placement,” “219, child activity,” “254, Visitation,” “228, routine/emergency medical services,” “229, routine/emergency Mental health services,” and “230, routine/emergency services.” If these are the only services for the child, and no other information is found regarding a placement, then these records should not be part of the AFCARS file. If the child does enter a foster care setting after one of these, then the record as noted above in the General Requirements section as well as the section on removal information, is to be included and the removal date is to be the date of the placement.

Lastly, as noted above in the Removal Episode section, children who are placed in their own home and the court has not dismissed the agency of its responsibility for placement and care, are to be included in the reporting population. The date the child was placed in his/her own home is reported in element #23 and element #24 does not change (the count does not increase), and element #41 is to indicate “trial home visit.”

Information related to special needs and adoption subsidy (Adoption Data Elements #9, 10, and 35)

A review of the data in the frequency report indicates the number of children the agency has determined as being special needs (adoption data element #9) is 1,251 (82%). However, in adoption data element #35 there are 1,525 (99%) children that were adopted who are receiving an adoption subsidy. This means there are more children receiving a subsidy than who were determined to have a special need. Based on the case file review, the issue was not that the child was not eligible. The issue is that the data was not correctly entered and/or extracted.

The problem seems to be that the State collects information regarding whether the agency has determined if a child has special needs on two screens: the Adoption Information and Adoption Eligibility pages. On the Adoption Information screen, the information is collected in a section named “Characteristics.” This screen is used to match children with potential adoptive parents for placement purposes. The Adoption Eligibility page also includes a question on the factors that makes the child difficult to place for adoption without provision of subsidy. If the answer is yes, the worker must check all the factors that apply. The lists used on each screen are also different. Given the identified issues, the State needs to review its criteria for determining if a child is special needs and to make this list consistent. Also, this information needs to be consolidated for the purposes of determining if a child has a special need and is eligible for adoption assistance. Suggestions the State may want to consider for redesigning the data collection are included in both the Adoption Element Findings and the Adoption Element Improvement Plan.

Was the mother married at the time of the child's birth? (Adoption Data Element #18)

The field to collect this information is on the Adoption Information screen, which is not completed unless the child is to be adopted. This is a piece of information that needs to be collected earlier in the life of a case, closer to the time the child is removed from his/her home. The State needs to move this field to a case management screen or the person screen. Another option if the State maintains a history table of the mother's marital status, is to check the mother's marital status against the child's date of birth.

Adoptive Child Was Placed by: Public Agency, Private Agency, Tribal Agency, Independent Person, or Birth Parent (Adoption Data Element #34)

The Frequency Report indicates that there were no children placed by a private agency. This is due to an error in the mapping of the values for "private agency." This value is being incorrectly mapped to "public agency." Private agencies that are under contact to DCF and who are acting as an agent of the agency are to be reported as public agency. If the adoption was handled by a private agency, and the only involvement the State has is due to an adoption agreement with the family for services or subsidy, then these are to be reported as "private agency."

Data Quality

Due to corrections that are needed for the foster care and adoption data 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. In addition to the technical corrections, many data elements need improvement in the quality of the data. The State will need to develop and implement a method to ensure accurate and timely entry of data into FSFN. After the technical corrections are made to the system and the extraction code, the data will need to be further analyzed for accuracy and a possible need for additional monitoring and training.

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.