

**Ohio
AFCARS
Assessment Review
Report**

May 2013

**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
Conclusion	9
Tab A	Detailed Findings
	Section 1: General Requirements
	Section 2: Foster Care and Adoption Elements
	Diagnosed Condition Characteristics
	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 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) or a Tribal Automated Child Welfare Information System (TACWIS) 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/TACWIS 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/TACWIS. 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	<p>All of the AFCARS requirements have been met and the agency has sustained a high level of quality data.</p> <ul style="list-style-type: none"> • The agency’s methodology for collecting the AFCARS information meets the technical and definitional requirements. • The agency’s information system contains the necessary fields to collect the AFCARS data. • The information is being accurately collected and extracted. • There are quality assurance processes in place that are used on a regular basis to ensure the data are accurately entered into the system or on the data collection form. • The agency has a process in place to identify and resolve data quality issues and makes necessary corrections in a timely manner.
3	<p>There are data quality issues. For example:</p> <ul style="list-style-type: none"> • The data are underreported due to inconsistent data entry. • The system/form is capable of collecting data but the data are not being entered into the system or recorded on a form. • Data entry is unreliable due to incorrect or ambiguous instructions, definitions, and/or data entry screens or forms. • There are no supervisory controls for ensuring timely data entry, or accurate data entry. • There is incorrect data entry due to training or design issues. • There is missing or incomplete data due to conversion errors. • There are inconsistencies in the numbers between related data elements. • Fundamental data elements have missing data. These include, but are not limited to: <ul style="list-style-type: none"> ○ Dates of removal from home, placement, and discharge (if applicable). ○ Placement location. ○ Removal and placement counts
2	<p>The technical requirements for AFCARS reporting are not fully met. For example:</p> <ul style="list-style-type: none"> • The title IV-E agency’s data collection method/information system has the capability to collect the data, but the program logic used to construct the AFCARS file has errors. • The title IV-E agency 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, e.g., it should be in foster care screens, not adoption screens. • The information system needs modification to encompass more information and/or conditions, e.g., disability information along with start/end dates. • The extraction code for the AFCARS report selects and reports incorrect data.
1	<p>An AFCARS requirement(s) has not been implemented in the methodology used to collect the data and/or in the information system. For example:</p> <ul style="list-style-type: none"> • The title IV-E agency’s data collection method/information system does not have the capability to collect the correct information (i.e., there is no data field on the screens or form). • 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>Title IV-E agencies operating an information system for which it received SACWIS/ TACWIS-level FFP were found to be using an external information system, or a tool (such as Excel or Access), and are not collecting and reporting the AFCARS data from the SACWIS/ TACWIS system.</p>

FINDINGS

During the week of August 20, 2012, the Children's Bureau conducted an AAR of the Ohio Department of Jobs and Family Services (ODJFS). 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 preliminary 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. The AFCARS report period used for the analysis of data was October 1, 2011 through March 31, 2012 (2012A). Data from the 2012B report period (April 1 – September 30, 2012) was used for comparison during the post-site visit analysis.

General Requirements (22)

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

Data Elements (103)

Rating Factor	Foster Care (66)	Adoption (37)	Total (103)
4	11	9	20
3	14	5	19
2	41	22	63
1	0	1	1

General Requirements

The General Requirements refers to AFCARS standards 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.

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, and who have been in foster care for more than 24 hours. There are two situations being included in the State's foster care reporting population that should not be included. The first are children who have not been in foster care for at least 24 hours. The selection logic excludes records of children whose removal episode began and ended

on the same day. The State's approach incorrectly includes records that started on one day, ended the next but the length of time in foster care is less than 24 hours. This has the potential for incorrectly identifying the number of removals a child has experienced. Given the State's current methodology, if the child re-enters foster care for more than 24 hours, the State will report this child as having two removal episodes instead of one.

The other situation relates to infants/children who are placed in foster care and in the same setting as a minor parent who is in foster care. For AFCARS reporting purposes, these children are not considered removed from a parent and in foster care.

Adoption Reporting Population

The State is correctly including the adoption reporting population per the AFCARS requirements.

Data Quality

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. Accurate data collection and quality of data was addressed in the Children's Bureau's Information Memorandum (IM) on Continuous Quality Improvement in title IV-B and IV-E programs (ACYF-CB-IM-12-07) issued August 27, 2012. While the purpose of that IM was to provide State title IV-B and IV-E child welfare agencies with information on Continuous Quality Improvement (CQI) systems as the Children's Bureau considers how to revise the Child and Family Services Review (CFSR) process, the data quality component is applicable to all title IV-E and IV-B agencies. In order to demonstrate quality data collection, the agency needs to ensure it has accurate, complete, and timely data that is consistent in definition and usage across the agency. The State must describe how it intends to ensure accurate AFCARS data quality on an ongoing basis in the General Requirements Improvement Plan under item #21.

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. 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. 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 the systems. We encourage the agency to continue its work on ensuring that caseworkers understand the importance of entering this information, not only for federal reporting, but for DJFS own use of the information for program evaluation and individual case reviews and for assuring successful outcomes for children.

Information System

One issue identified during the AFCARS review that is not directly related to the AFCARS requirements but is an important aspect of disaster preparedness is the way placements are displayed in the system. There are two separate screens that display a child's location. These need to be combined into one screen in order to readily and quickly identify where a child was mostly recently residing in the event of a disaster, natural or man-made.

Data Elements

There were several elements, as noted in the above chart, which require some type of technical correction. Some of these errors apply to the same field but affect multiple data elements (e.g., race and Hispanic/Latino origin) and others affect a group of elements (e.g. circumstances associated with a child's removal from home).

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. The system has an "ancestry" field that includes nationalities that are considered race for the purpose of Federal reporting. The extraction code that constructs the AFCARS data file does not check the ethnicity field for these races. Therefore, even if one were selected by the caseworker, it would not get reported. This could result in potentially underreporting the number of individuals for a particular race or the number of individuals who are multi-racial. Also, while the system does have a field for the caseworker to identify if the individual is of Hispanic/Latino origin, there also are nationalities listed in the ancestry field that are Hispanic/Latino. There is not an edit that identifies if the caseworker answered the Hispanic/Latino field as "no" but selected one of the Hispanic/Latino ethnicities.

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

Ohio's 2012A AFCARS data indicated an underreporting of disability this information. The frequency distribution for the data reported in the 2012A report period indicates that there were only 1,229 (7%) children with a health/mental health condition that is reportable to AFCARS. The case file review revealed that 60% (43 out of 75) of the records analyzed indicated the child did have a diagnosed condition, but the response in AFCARS indicated a response of no diagnosed condition. As a result of some changes made to the extraction code and the system, the data for the 2012B period did improve. There were 3,635 (22%) records reported as the child having a diagnosed condition. There are still some corrections that are needed to the program code related to the mapping of the State's values to the appropriate AFCARS category in elements #11 – 15.

Removal Episode Information (Foster Care Data Elements #18 – 21)

As noted above in the section on foster care reporting population, there are issues with who is reported to AFCARS. There will need to be related corrections made to the noted foster care

data elements in order to ensure the correct start date for a child's removal episode if the first episode (element #18 and #20) was one that was less than 24 hours. Also, there needs to be a way for the program code to differentiate between when an infant is placed with his/her teen parent or is in a different foster care setting.

Information related to the circumstances associated with a child's removal from home and placement into foster care (foster care elements 26 – 40)

Another area that appears to be underreported is the circumstances associated with removal. The case file review findings indicate there were generally more conditions present that contributed to the child's removal than what is being recorded in the system. The State needs to provide additional training and oversight to ensure all conditions, alleged or substantiated, that were present are entered into the case management record. This is also another area where the design of the screen and the fields used to record the information may be contributing to incomplete data. Currently, case workers are required to go to two separate fields to enter the information and there is not an internal edit check to the screen to require the worker to go to the second field. A better approach is to combine all of the reasons associated with a child's removal onto one selection screen and indicate that the worker is to check all that apply.

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 from: Within State/Tribal Service area; Another State or Tribal Service Area; or Another Country

The system does not contain a field to collect this information and it also cannot be derived from other pieces of information in the system. The State needs to add this information since the agency does enter into adoption agreements for subsidies with families adopting a special needs child through a private agency.

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

The only options for the caseworker to select are public or private agency. The other options are to be included in the event the agency becomes involved with the adoption through an agreement for adoption subsidies or non-recurring expenses.

Conclusion

As noted in the Background section of this report, the AAR ascertains the extent to which a title IV-E agency meets all of the AFCARS requirements and examines the quality of its data, as well as, the accuracy of the data related to the foster care and/or adoption case of a child. 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 compliance (i.e., are lacking in substantial conformity) with the requirements of the title IV-E Plan².

This report identifies the most substantial areas the State needs to address in order to meet the AFCARS requirements. In addition to the ones noted in the previous section, there are several other areas that need improvement. Please refer to Tab A, Detailed Findings, for information related to the General Requirements, the Data Elements, and the Case File Review for additional findings. The information provided by this AAR will enable the State to bring its data collection and AFCARS reporting into conformity with the AFCARS standards.

The general requirements and elements that received a rating factor of “3” or lower are the items in the enclosed AFCARS Improvement Plan (AIP). Action items include program extraction code and/or screen modifications, modifications to data element mapping, system interface development, caseworker training, supervisory oversight, and development of an appropriate AFCARS quality assurance process. The AIP included with the report does not include due dates. As part of the post-site visit phase the State was to begin its own evaluation of the preliminary findings and determine what actions are needed to correct the identified problem and the time it will take to complete the tasks. Within 30 days of receipt of the final report, title IV-E agency staff must submit the initial AIP electronically to the Children’s Bureau with estimated dates for completing each action item. 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).

All items in the improvement plan must have a rating of four before the AIP is considered completed. Once the AIP is completed and approved, a letter will be sent to the title IV-E agency from the Children’s Bureau’s acknowledging the completion of the AFCARS Improvement Plan.

The Children’s Bureau is committed to assisting title IV-E agencies to develop child welfare information systems and to collect quality data. The Regional Office will work with the State to determine if technical assistance is needed and available, to implement the AFCARS Improvement Plan (AIP). The State may obtain technical assistance from the Children’s Bureau’s Network of Training and Technical Assistance Centers.

² 45 CFR 1355.40(e)