# Adoption and Foster Care Analysis and Reporting System (AFCARS)

# STATE GUIDE TO AN AFCARS ASSESSMENT REVIEW

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# **PREFACE**

The Administration for Children and Families (ACF) is committed to supporting the collection of quality data that can be used to address policy development and program management issues at both the State and Federal levels. The use of the Adoption and Foster Care Analysis and Reporting System (AFCARS) data is of significant importance to the programs under the administration of the Children's Bureau.

The AFCARS Assessment Review was developed to support ACF's commitment to quality data by assessing the accuracy of States' data collection in a way that also provides intensive technical assistance to staff that collect and utilize the data.

ACF developed the *State Guide to an AFCARS Assessment Review* to provide guidance to State child welfare program and system staff on the AFCARS assessment review process.

ACF welcomes comments and suggestions from those using this guide. Comments may be sent to:

Department of Health and Human Services Administration for Children and Families Administration on Children, Youth and Families Children's Bureau Director, Division of Program Implementation 330 C Street, S.W. Washington, D.C. 20201

The State Guide to an AFCARS Review is available on the Children's Bureau's web page at http://acf.dhhs.gov/programs/cb/dis/afcars. It is accessible in the following formats: Microsoft Word 97, PDF, and Text.



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## **CHAPTER I: INTRODUCTION**

#### A. OVERVIEW

The Department of Health and Human Services' (HHS) Administration for Children and Families (ACF) provides national leadership and direction in planning, managing, and coordinating the administration and financing of a broad range of comprehensive and supportive programs for children and families, including child welfare programs. These programs are, in large part, carried out by State and local agencies. ACF retains responsibility to monitor and evaluate the programs to ensure that they are being operated as intended by law and regulation. This includes the assessment of the automated information systems operated by State child welfare agencies that support the programs under titles IV-B and IV-E of the Social Security Act, and the collection of relevant data.

States are required by Federal law and regulation to develop a system to collect data on children in foster care and those who have been adopted under the auspices of the State child welfare agency. The Federal information system used to collect and process the data is known as the Adoption and Foster Care Analysis and Reporting System (AFCARS). AFCARS Assessment Reviews are conducted in order to verify the State information systems' capability to collect, extract, and transmit AFCARS data accurately in accordance with the Federal regulations and ACF's policies.

The State Guide to an AFCARS Assessment Review (the Guide) provides information on:

- the AFCARS assessment review process,
- how to request an AFCARS assessment review.
- how to prepare for the on-site review, and
- completing the AFCARS improvement plan, if applicable.

Additionally, the Guide ensures that the same review criteria are applied equally to all States, that Federal reviews are conducted in a consistent manner, and that they are well-documented and substantiated.

#### B. AUDIENCE

The Guide is intended to assist State agency staff to prepare, plan, and participate in the AFCARS assessment review. State agency staff that are involved with the assessment review include both systems and program staff.

#### C. BACKGROUND

1. Adoption and Foster Care Analysis and Reporting System (AFCARS)

AFCARS was created, in part, due to concerns raised about the lack of national information available on children in foster care, their families, the types of foster care settings and adopted children. In 1986, Congress amended title IV-E of the Social Security Act (the Act) by adding section 479, which requires the Federal government to institute a foster care and adoption data collection system. In response to the law, requirements for States to report adoption and foster care data to a Federal system (known as AFCARS) were implemented under Federal regulations at 45 CFR 1355.40. The AFCARS collects case level information on all children in foster care for whom the State child welfare agency has responsibility for placement, care or supervision and on children who are adopted under the auspices of the State's public child welfare agency. The data required by AFCARS is information that would normally be collected during the course of a social worker's assessment, planning, and service provision, so that additional information does not need to be collected solely for the purpose of meeting AFCARS requirements.

ACF uses AFCARS data for a number of reasons, including:

- responding to Congressional requests for current data on children in foster care or those who have been adopted;
- responding to questions and requests from other Federal departments and agencies, including the General Accounting Office (GAO), the Office of Management and Budget (OMB), the DHHS Office of Inspector General (OIG), national advocacy organizations, States, and other interested organizations;
- short and long-term budget projections;
- trend analyses and short and long-term planning;
- targeting areas for greater or potential technical assistance efforts, for discretionary service grants, research and evaluation, and regulatory change;
- determining and assessing outcomes for children and families.

Additionally, the AFCARS data are used specifically in the:

- Adoption Incentives Program;
- Child Welfare Outcomes Report;
- Child and Family Services (CFS) Reviews;
- Title IV- E Eligibility Reviews; and
- Allotment of funds in the Chafee Foster Care Independence Program (CFCIP).

States are required to submit AFCARS data semi-annually to ACF in accordance with 45 CFR 1355.40<sup>1</sup>. These data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR 1355. These edit checks are only able to determine substantial compliance 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.

As such, these edit checks are an important first step to quality data. However, substantial compliance does not inform us whether or not a State's information system satisfies all of the requirements in the Federal regulations, or if the State is submitting accurate and reliable data to ACF. This explains why in the past a State may have been penalty free yet still needed to improve its AFCARS data for accuracy, reliability and quality. For example, the edit checks cannot assess the data to determine whether the State submitted data on the correct foster care population for the correct time period required by the regulations. Also, the edit checking utility cannot determine if the State has correctly coded information to the AFCARS values.

# 2. Statewide Automated Child Welfare Information System (SACWIS)

Complementing the AFCARS reporting is Federal support for the development of SACWIS. At the same time the final rule on AFCARS was issued, regulations at 45 CFR 1355.50-56 were published implementing section 474(a)(3)(C) and (D) of title IV-E of the Act. Section 474(a)(3)(C) (now revised) provided enhanced funding for Federal fiscal years (FFY) 1994 - 1996<sup>2</sup> for development of SACWIS to support the States' programs under titles IV-B and IV-E of the Act. Enhanced funding at a 75% match rate was made available to the States for the planning, design, development, and installation of statewide child welfare systems. In order to qualify for SACWIS funding, States' systems must, among other things, meet the AFCARS requirements in 45 CFR 1355.40. States that develop a SACWIS with enhanced Federal funding must not collect the AFCARS data from a separate information system once the SACWIS is operational.

#### D. INFORMATION SYSTEM REVIEWS

The Children's Bureau has two review processes to oversee State implementation of the AFCARS and SACWIS: the SACWIS Assessment Review and the AFCARS Assessment Review.

<u>The SACWIS Assessment Review</u> is conducted in States that have received Federal funding to develop and operate a SACWIS. It assesses the State agency's SACWIS for its compliance with Federal statutory and regulatory provisions, as well as automated functional requirements

<sup>&</sup>lt;sup>1</sup> AFCARS report periods are based on the Federal fiscal year. Report periods are October 1 – March 31 (data are due by May 15) and April 1 – September 30 (data are due by November 14).

<sup>&</sup>lt;sup>2</sup> The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Public Law 104-193) extended enhanced funding through FY 1997.

approved in the State's Advanced Planning Document (APD). The Children's Bureau's Division of State Systems (DSS) staff conduct assessment reviews of SACWIS once a system is operational.

As part of this review, the SACWIS review team identifies whether or not the State is using the SACWIS to collect the AFCARS data, and has submitted an AFCARS data file. If an AFCARS data file has not been submitted, the team assesses whether the State has the capability to submit it. Additionally, the SACWIS assessment review team records any questions the State has regarding AFCARS, and whether the information system contains all of the AFCARS data elements. This information is then provided to the AFCARS project leader who will follow up with the State regarding their questions.

Since AFCARS is also a requirement of the SACWIS, it is necessary to conduct a review of the data collection system as part of that review. However, given the extensive nature of the two reviews, it is not always practicable to conduct AFCARS and SACWIS assessment reviews at the same time.

The AFCARS Assessment Review allows for a comprehensive evaluation of the State's automated information system and assesses the accuracy of data collected in accordance with the definitions of the data elements. This is done by verifying the State information system's capability to collect, extract, and transmit the AFCARS data accurately to ACF. Additionally, the review provides assurance to the Children's Bureau that the data being collected is reliable and consistent across all States. The review process goes beyond the edit checks that must be met in order to pass the AFCARS compliance error standards. The review assesses the extent to which a State is meeting <u>all</u> of the AFCARS requirements <u>and</u> the quality of its data.

AFCARS assessment reviews will be conducted in every State, regardless of whether a State has a SACWIS. For States with an operational SACWIS, an AFCARS assessment review may occur either prior to or following a SACWIS review. It is possible for AFCARS and SACWIS reviews to be conducted concurrently.

The results and documentation of each of the AFCARS and SACWIS assessment review findings will be shared with the two review teams, as well as with the team conducting the Child and Family Services review.

#### E. AUTHORITY

The statutory basis for AFCARS and SACWIS is the Social Security Act (the Act). The following lists the specific requirements that govern information systems, data collection, and ACF's review of the AFCARS requirements:

Section 422(b)(10)(B)(i) of the Act: Requires States to have an operating "statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care."

Sections 471(a)(6) and 476(a) of the Act: Establishes ACF's responsibility to verify the correctness and reliability of State reports and to exercise oversight of foster care and adoption data.

Section 479 of the Act: Requires HHS to implement a national data collection system to collect information with respect to the foster care and adoption population.

Section 474(a)(3)(C) and (D) of the Act: Provides funding to States for the establishment and implementation of comprehensive, automated, statewide information systems supporting child welfare programs under titles IV-B and IV-E of the Act, including the collection of foster care and adoption data under section 479 of the Act.

45 CFR Parts 1355, 1356 and 1357: Sets forth the requirements implementing programs under titles IV-B and IV-E of the Act.

45 CFR Parts 1355.40 and Appendices to 45 CFR 1355: Sets forth the requirements for the AFCARS data system.

45 CFR 1355.50-56: Sets forth the requirements for developing and implementing a SACWIS.

In addition to the law, regulations, and this guide, the following guidelines apply:

- Program Instructions (PI), Information Memoranda (IM), and policy in the Child Welfare Policy Manual issued by the Administration on Children, Youth, and Families (ACYF) which apply to AFCARS and programs under titles IV-B and IV-E of the Act; and
- AFCARS Technical Bulletins issued by ACYF.

#### F. STRUCTURE OF THE GUIDE

The Guide is organized into six chapters. Chapters one through three provide a general overview and background of the reviews and the review teams. Chapters four and five describe the activities involved in an AFCARS assessment review. Chapter six addresses the activities that occur after the site visit and provides information on the AFCARS improvement plan.

Information about AFCARS, or other program-related guidance, is available from the Children's Bureau web page at http://acf.dhhs.gov/programs/cb. Information regarding AFCARS and SACWIS can be found at http://acf.dhhs.gov/programs/cb/dis/afcars/index.html.

This *Guide* may undergo periodic updates and/or revisions. To ensure you have the latest version of the *Guide*, check the Children's Bureau's AFCARS web page once a review has been scheduled.

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#### CHAPTER II: OVERVIEW OF AFCARS ASSESSMENT REVIEWS

#### A. OVERVIEW

An 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 assesses 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. This comparison tests the accuracy of the State's data conversion process and supplements the understanding of the data reported to AFCARS.

#### **B. STRUCTURE**

The AFCARS assessment reviews are conducted by the Children's Bureau, the ACF Office of Information Services (OIS), and the ACF Regional Offices. The AFCARS report period under review will be the most recent report period prior to the scheduled review. The AFCARS on-site phase of the review is conducted in the central office of the State agency.

The AFCARS assessment review process consists of three phases:

- Pre-site Visit
- On-site Visit
- Post-site Visit Review

Exhibit 1 outlines the major activities that occur in each phase. Exhibit 2 provides an overview of the methodologies used to evaluate a State's AFCARS. Chapters four and five provide detailed information on each phase and the procedures to be conducted during each phase.

Exhibit 1: AFCARS Assessment Review Structure

PHASE	PRE-SITE VISIT PHASE	ON-SITE REVIEW PHASE	POST-SITE VISIT REVIEW PHASE
ACTIVITY	Conduct Conference Call(s) Schedule Site Visit Exchange Documentation Enter Test Case Scenarios Select Sample for Case	Conduct Entrance Conference & Brief System Demonstration  Review Case Scenarios/Run Extraction Routine  Review Data Elements  Conduct Technical Analysis	Finalize Findings & Conclusions  Prepare and Send Letter and Final Report to State Agency
	File Review  Identify Case Files  Finalize Arrangements for On-site Review	Review Case Files  Document Review Findings  Conduct Exit Conference	
TIMEFRAME	10 Weeks Prior to the Onsite Review Phase	5 Business Days	60 Business Days following the On-site Review

# Exhibit 2: AFCARS Assessment Review Methodology

<u>Review of AFCARS General Requirements</u>: This includes a discussion with State agency staff of State child welfare and information system policies and procedures to determine if they are consistent with AFCARS requirements.

Systems Documentation Review: The State will provide the Federal team with documentation that describes AFCARS-related database structures, program code, programmers' notes, encryption program documentation, information on interfaces to non-SACWIS systems, and the system's user's manual. This process consists of an element-by-element review of the State's mapping and program logic documentation, which will confirm if the State's AFCARS data element mapping and population definitions are consistent with the Children's Bureau definitions.

<u>Data Quality and Frequency Report Analysis</u>: The Federal team will analyze AFCARS data submitted by the State for the most recent AFCARS submission to identify possible errors.

<u>Case File Review</u>: Approximately 110 cases will be randomly selected from the latest AFCARS submission. The State will collect the hard copy case files, and the Federal/State team will compare the information in the case files to the AFCARS data submitted for the most recent submission

<u>Test Case Scenario</u>: The State team will enter test case scenarios into the State's information system that is used for training, or into a test system. The staff will run the AFCARS extraction program and create an AFCARS submission file with the test cases. The Federal team analyzes this information. Test cases will be compared with expected output to validate mapping and extraction routines. One case will be entered during the site visit to allow the Federal review team an opportunity to observe how a case is entered into the State system.

#### **B. SELECTION PROCESS**

1. Eligibility Criteria

In order for a State to be considered eligible for an AFCARS assessment review, two criteria must be met. These are:

- The State's SACWIS, or other automated information system, must be operational Statewide.
- The State has submitted both a foster care and an adoption data file from its information system to AFCARS.

#### 2. Selection Factors

In order to establish a review schedule, the following factors will be taken into consideration. These factors will be used to prioritize the order in which States are reviewed.

- Has a SACWIS review been conducted in the State?
- Is the SACWIS system being transferred to another State?
- Is the State scheduled for a CFS review within the next two years of the current Federal fiscal year?
- Has the State requested an AFCARS assessment review?
- Were AFCARS-related issues identified during a SACWIS, CFS, or title IV-E review?
- Have AFCARS-related issues been identified by other sources, such as OMB, GAO, or OIG?
- What is the quality of the State's data?

The priority for conducting AFCARS reviews will be in those States that have completed the onsite process of a SACWIS review and those States that did not develop a SACWIS.

# 3. State Request for a Review

While ACF will, in most cases, initiate the scheduling of an AFCARS assessment review, States may request an AFCARS assessment review if they meet the two eligibility criteria described in section one above. This section outlines the steps for a State to request an AFCARS assessment review.

- □ The State Child Welfare Director must submit a written request by July prior to the fiscal year in which the State is asking for the review. The letter should be submitted to the State's Federal ACF Regional Office stating the reason(s) for the request.
- □ The letter should respond to the selection factors listed above, suggest preliminary dates for the review, and identify a State contact person for coordinating the review.
- □ For States that are implementing a SACWIS, the request should address the status of the State's SACWIS, whether an AFCARS data file has been submitted from the system, and when the State's data conversion process occurred and how it was implemented.
- □ ACF will respond to a State's request for an AFCARS assessment review within 30 business days.

# C. REQUIREMENTS SUBJECT TO REVIEW

States' AFCARS will be reviewed against the requirements in 45 CFR 1355.40, the appendices to 45 CFR 1355, AFCARS policy and Technical Bulletins. There are two major areas that are assessed during an AFCARS review. They are: 1) the AFCARS general requirements, and 2) 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. During an AFCARS assessment review, each of the 103 data elements and the AFCARS general requirements will be

assessed on the basis of the requirements in the regulation and other policy and technical issuances. Information that is collected from each of the components of the review is combined and assigned a factor. The general information requirements will be evaluated and rated separately from the data elements. Chapter five provides more detail on the evaluation process.

- □ Appendix A lists the AFCARS policy issuances and technical bulletins.
- □ Appendix B includes a list of some of the policy and procedures questions that will be discussed during the review.
- □ Appendix C lists the AFCARS general requirements.
- □ Appendix D lists the AFCARS data elements and examples of what each element will be evaluated on during the review.

#### D. RATING FACTORS

A scale of 1 (does not meet AFCARS standards) to 4 (fully meets AFCARS standards) is used to assign a rating factor for each of the AFCARS general requirements and data elements. Exhibit 3 lists the factors and definitions. The State is not given an overall numerical rating based on the AFCARS assessment review.

A State that has been determined not to satisfy the AFCARS standards fully (factors 1 through 3) will need to make the corrections identified by the review team to improve its data. These action steps will make up the AFCARS Improvement Plan and will be a part of the final report written by ACF. The State is required to make the changes to the information system and/or data entry in order to satisfy the applicable requirements and standards fully. Since the AFCARS data are used for several significant activities at the Federal and State level, the State should implement the action items as soon as possible as a way to improve the quality of its data.

States found not to be in compliance during the AFCARS assessment review will not incur penalties. We expect the State will use the AFCARS Improvement Plan as a way to formalize technical assistance needs, action steps and improve the quality of its data.

Exhibit 3: Rating Factors

RATING FACTOR	DEFINITION
1	The AFCARS requirement(s) has not been implemented in the
	information system. For example:
	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	The technical system requirements for AFCARS reporting do not fully meet the standards. For example:
	The State information system has the capability (screen) to collect the
	data, but the program logic is incorrect
	<ul> <li>The State uses defaults for blank information.</li> </ul>
	<ul> <li>Information is coming from the wrong place on the system.</li> </ul>
	• 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	The technical system requirements for AFCARS reporting are in place,
	but there are data entry problems affecting the quality of the data.
	The system functions as required, but
	<ul> <li>the data are underreported due to inconsistent data entry.</li> </ul>
	<ul> <li>the data are not being entered and/or there are no supervisory</li> </ul>
	controls for ensuring data entry.
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.

A State that has been determined not to satisfy the AFCARS standards fully (factors 1 through 3) will need to make the corrections identified by the review team to improve its data. Action steps will be identified in the AFCARS Improvement Plan and will be included in the final report issued by ACF. The State is required to make the changes to the information system and/or data entry in order to satisfy the applicable requirements and standards fully. Since the AFCARS data are used for several significant activities at the Federal and State level, the State should implement the action items as soon as possible as a way to improve the quality of its data.

States found not to meet the AFCARS standards fully during the AFCARS assessment review will not incur penalties. We expect the State will use the AFCARS Improvement Plan as a way to formalize technical assistance needs, action steps, and improve the quality of its data.

To the extent that the State takes action to correct its collection and submission of AFCARS data, it is possible that a resulting improvement will bring to light other weaknesses that have been masked. For example, a State's program logic may be written to ensure that there are no missing data by mapping missing information to a known AFCARS value (i.e., setting defaults). Once this is corrected the State will need to ensure that workers are actually entering the required information.

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## CHAPTER III: THE REVIEW TEAMS

#### A. INTRODUCTION

This chapter identifies the individuals that must be involved in the AFCARS assessment review. It includes information on who is responsible for various tasks in each phase of the review, and who should be present for each of the on-site segments. In general, the AFCARS review team is composed of two groups, the State team and the Federal team. Membership on the review team involves a significant commitment of time and effort. Both State and Federal team members are responsible for the following activities:

- Participation in conference calls scheduled prior to the review.
- Implementation of all assigned activities associated with the review.
- Participation in review activities during the on-site review.
- Participation in entrance and exit conferences.

#### B. COMPOSITION OF THE REVIEW TEAMS

At a minimum, the following individuals should be considered members of the State team:

- Child Welfare Administrator
- AFCARS Project Manager (or a person responsible for AFCARS)
- SACWIS Project Manager (or a person responsible for SACWIS)
- Adoption Program Specialist
- Foster Care Program Specialist
- Policy Director
- Child and Family Services Review Coordinator
- System Analyst/Programmer
- Contractor Representative, if applicable

There is not a designated limit on the number of individuals that can be members of the State review team. The State team may include staff other than those listed above. For instance, the agency may want to include members from their eligibility or financial units during the discussion of the foster care and adoption elements, or sources of income. The section below on "Roles and Responsibilities of Team Members" provides additional guidance on who should participate in all or part of the review, and expectations for team members.

At a minimum, the Federal team will consist of:

- Children's Bureau Representative(s)
- Office of Information Services (OIS) Representative(s)
- ACF Regional Child Welfare Program Specialist
- ACF Regional Information Technology Specialist (if applicable)

The Federal team may include other staff than those listed above, either program or systems staff. Contract staff from OIS may be part of the review team, or represent OIS during the review.

#### C. ROLES AND RESPONSIBILITIES OF TEAM MEMBERS

Exhibit 4 provides summary information on the role and responsibilities of the State team members and includes the primary Federal team members.

#### 1. State Team

This section gives additional guidance on who should participate in the review and their responsibilities. State team members should be identified as soon as a review has been agreed upon by ACF and the State agency. Also, the agency should designate a State Review Team Coordinator.

• Administrators (such as the Child Welfare Administrator, Commissioner, Division Directors)

Administrators are not expected to participate in the entire review process, but are considered an integral component of the State team. Administrators should be informed of the review and should attend the entrance and exit conferences.

- The State Review Team Coordinator
  - Serves as the liaison with the Federal review team coordinator to plan the review and to ensure follow-through on the pre-site visit activities.
  - Disseminates information internally on the nature and scope of the review in order to prepare program and data processing staff who will be participating in the on-site review.
  - A checklist of activities is included under Appendix E that may be used to prepare for the AFCARS assessment review.
- Foster Care and Adoption Managers

Program staff representing the State's foster care and adoption units are integral members of the State AFCARS review team. In order to assess the State's collection and reporting of the AFCARS data, the State's child welfare policies and practices need to be taken into account. Additionally, since it is often the program staff who are using and explaining the data, having them participate in the review provides an opportunity for them to further examine the quality of the data.

The foster care and adoption managers may not be required to be present during every portion of the on-site review, but they should be available if their assistance is needed. For instance, while the foster care elements are being reviewed, the adoption program manager does not need to participate. However, the adoption program manager should be available if a question that pertains to adoption comes up during the foster care review.

#### Field Staff

Field staff (front line case workers, supervisors, regional staff, etc.) should participate in the case file review. The State may decide the level and number of staff that participate in the case review. See Chapters four and five for more information on the case file review process. The State is not limited to having field staff present only during the case file review. If the State agency has "super users", i.e., primary contacts for providing assistance and information on the system, etc., in its field offices, then the agency may want to consider adding these individuals to the State team. The agency may include them for the full week or for selected segments of the review.

#### Technical Staff

Technical staff representing the State's child welfare system are part of the core review team. This would also include any staff under contract to the State agency to develop or operate the information system. The technical team will be primarily responsible for describing how the system was designed to collect and extract the AFCARS data. The person primarily responsible for developing the program code and writing the routines for AFCARS data extraction must be present during the week of the review.

#### Other Staff

The State may choose to bring in representatives from other agencies that provide data to the State for its AFCARS reporting. Their participation may be useful during the general discussion of the types of information that is needed for AFCARS or for the data element review. Examples include representatives from juvenile justice, the courts, mental health, contract providers, or Tribes. Additionally, the State may want to consider including training staff.

The following are factors the State may want to consider when selecting additional members for the review team:

- training and technical assistance that the review experience can provide to the State agency staff, and staff of other agencies, and
- schedules of all team members.

#### 2. Federal Team

A Federal review team coordinator will be assigned from the Children's Bureau as the lead for the AFCARS assessment review. This person will be identified as soon as the State has been scheduled for an AFCARS review. The Federal review team coordinator serves as the liaison with the State review team coordinator to plan the review and to ensure that pre-site visit activities are completed in a timely manner. The Federal review team coordinator will be responsible for finalizing arrangements for the site visit, clarifying expectations and answering questions about the review process, ensuring the State has submitted all the needed documents on time to ACF, conducting the on-site review, and preparing the draft report.

All Federal team members are responsible for evaluating the documentation submitted by the State prior to the on-site visit to asses whether the State meets the AFCARS requirements.

Exhibit 4: Review Team Roles and Responsibilities

Title	Roles/Responsibilities	
State Review Team	Serve as the liaison with the Federal review team coordinator	
Coordinator	Provide list of State team members to Federal review team coordinator	
	Ensure the timely delivery of materials to all team members	
	• Ensure that State information system documentation is sent to ACF Regional and Central Offices on time	
	Handle logistics for calls, schedules and documentation dissemination	
	Ensure that the test cases are entered into the State's information system	
	• Ensure that paper case files are pulled and sent to the office where the review will be held	
	Schedule State review team members for on-site review	
	Reserve a room large enough to accommodate the State and Federal review teams during the site visit	
	Reserve additional space for reviewing the case files, if necessary	
	Ensure access to the State Information System for the entire week	
State AFCARS	Represent areas of the State's child welfare program under review	
Assessment Review	Provide expertise in team members' respective areas, including foster care,	
Team	adoption, program policy, and information technology	
Federal AFCARS	Conduct site visit	
Assessment Review	Produce findings	
Team	Produce and review draft final reports	
Federal Review Team	Schedule pre-site visit conference calls	
Coordinator	Finalize due dates for documentation exchange, and ensure documents are	
	received by the ACF Regional and Central Offices	
	Finalize arrangements for the on-site review with the State review team coordinator	
	Follow up with team members on their assignments	
	• Send letter to State confirming the dates of the site visit, names, positions, and	
	telephone numbers of the Federal team members	
ACF Technical Lead	Assign ACF systems staff	
	Review State's system documentation	
	Assume lead responsibility in technical matters related to the review	
	Run quality, frequency, and case file review reports on raw data	

## CHAPTER IV: PROCEDURES FOR THE PRE-SITE VISIT PHASE

#### A. INTRODUCTION

This chapter outlines activities the State agency staff need to complete in order to prepare for the on-site phase of the review. During this phase the State should identify those areas it wants to specifically address during the site visit. The State agency should view the AFCARS assessment review as an opportunity to examine its foster care and adoption data concerns completely and take advantage of the intensive technical assistance available from ACF. The State may also want to review its CFSR Statewide data profile and Statewide Assessment to identify any areas in which it may want to request assistance from the Federal AFCARS review team.

The pre-site visit phase involves the following activities:

- Documentation Exchange
- Case Scenario Entry
- Case File Review Preparation
- Finalize the On-Site Agenda

#### **B. OVERVIEW OF THE PRE-SITE VISIT ACTIVITIES**

The pre-site visit phase officially starts when a State is notified of its AFCARS assessment review. Ideally, a State will know by July that it will have its AFCARS assessment review the next Federal fiscal year. Also, a State will not have less then three months notice of an AFCARS assessment review.

Once the dates are selected for the AFCARS assessment review, a confirmation letter will be sent to the State. This letter contains the following information:

- □ The date of the on-site review.
- □ The date the State's system documents are due to ACF.
- ☐ The date the case file sample and test case scenarios will be sent to the State.
- □ The date the test case extraction is due to ACF.
- □ The contact information for the Federal review coordinator and members of the Federal team.

#### C. DOCUMENTATION EXCHANGE

This section describes the documents that are exchanged between the State and ACF. It is not ACF's expectation that the State create new system documentation for the review team to analyze. The State should submit the technical documentation in its current format. For the purpose of the review, if the State is anticipating major revisions to the system and technical documentation prior to the on-site review, the State and ACF should confer on a date to "freeze" the documentation.

The State's system documentation may be submitted earlier then the due dates. States should begin consolidating the system documentation as soon as possible and maintain an up-to-date library of system documentation. This will also be helpful for those States that are developing a SACWIS and to those preparing for the SACWIS assessment review.

The State provides the Federal team with the State's system documentation that relates/pertains to AFCARS data elements, such as, the program logic, database structures, data dictionary (for the AFCARS data elements), and data mapping to the AFCARS values. See Exhibit 5 for a list of the type of documents to submit. Samples of actual technical documentation (pseudocode, Cobol, etc.) are included in Appendix F.

The Federal team provides the State with the test case scenarios and the sample for the case file review.

#### Procedure

- By the due dates, submit copies of the documentation to ACF. The documentation can be emailed to the ACF Regional Office and the Federal review team coordinator in the Children's Bureau. If the State is sending hard copies in lieu of electronic copies of the documentation, then two copies of the documentation should be sent to the ACF Regional Office and two copies to the Federal review team coordinator.
- □ Use the Documentation Checklist in Appendix G to track when documentation was sent and received.
- □ If a State has previously submitted the required documentation for a SACWIS review, then the State may not need to resubmit all documents, only updates. This will depend upon any revisions the State may have made to the documents.
- □ Contact the ACF Technical Lead for questions concerning the technical documentation.

Note: It is crucial that the documentation be submitted to ACF on time. Delays in the submission of the documents will affect the Federal team preparedness for the on-site review and may result in an incomplete on-site evaluation.

#### Exhibit 5: State Documentation List

- <u>Programming Logic (Source Code):</u> The programming logic that is run to derive/extract each AFCARS element from the State System.
- <u>Data Element Dictionary:</u> The AFCARS data elements and the codes with a corresponding description for all AFCARS elements as well as elements that may be referenced in mapping forms or other submitted documentation. As appropriate, include the definitions of the codes, e.g., adpmdob=adoptive mother's date of birth.
- <u>Mapping forms</u>: The Children's Bureau developed a set of mapping forms for both adoption and foster care, which may be used by the State. If the State completed these forms, it may submit them to the Children's Bureau. Otherwise, the State may submit other documentation used to map the State's values to the AFCARS values.
- Relevant Tables and Fields: Specific fields and tables from which the data are pulled.
- <u>Database Structures:</u> Tables referenced in mapping documentation.
- <u>Extraction Routine Notes:</u> A logical description, or the steps in pseudo code, of how records are selected for inclusion in the foster care and adoption submission.
- Data Entry Screens: Printouts of screens that are relevant to AFCARS data elements.
- Interface Structure: Information on interfaces to non-SACWIS systems.
- <u>Organizational Charts:</u> For the program and information technology divisions.

#### D. TEST CASE SCENARIO ENTRY

The case scenario phase of the AFCARS review helps ACF reviewers evaluate several aspects of the State's system. It allows reviewers to see where and how data are collected in your system, to confirm that several scenarios which are required to be reported to AFCARS can be captured in the system, and to discover any State policies and procedures that inhibit your ability to report certain values or data elements. The records that are created by these scenarios will be extracted from your data system and compared with the expected data to ensure that the extraction and/or AFCARS file creation processes are functioning properly. This includes ensuring that records that should be extracted based on the dates of care are extracted. It also includes ensuring that data that were entered into the system are the same data that are extracted from the system.

These are <u>test</u> cases and while the Federal review team coordinator may answer <u>some</u> questions the State has on the cases, most will not be answered in the interest of determining objectively the State's AFCARS capability. The intent of the test cases is to validate the State's information system for accuracy. Appendix H contains the instructions for entering the case scenarios.

#### Procedure

- ☐ The Federal review coordinator will email the test cases to the State review coordinator by the established due date.
- □ The State review coordinator will identify a staff member who is familiar with the system and/or case practice to enter the cases. Approximately 40 working hours should be allotted for this task
- □ A training system or test environment may be used to enter the test cases. This should mirror the current production system.
- □ Once the cases are entered into the system, the State review team coordinator will contact the ACF Technical Lead for instructions on transmitting the file. The file must be submitted by the established due date.

#### E. CASE FILE REVIEW PREPARATION

The purpose of a case file review is to compare the AFCARS data submitted by the State to ACF with the data in the paper case file. It will allow team members to examine the conversion of data from a paper case file and/or an older information system.

The sample of foster care and adoption cases reviewed on-site is selected randomly from the most recent AFCARS data submitted to ACF by the State. The ACF Statistician draws the sample and provides the list of encrypted, or sequentially numbered, case record numbers to the Federal review team coordinator. The Federal review team coordinator will transmit the encrypted/sequential case record numbers to the State review team coordinator.

The total number of cases selected will not be a statistically significant number in relation to the total population of children in foster care, and children that had been adopted, in the previous report period. The sample will consist of approximately 110 case record numbers, 80 foster care records and 30 adoption records. This number allows for an oversample.

Because not all children in foster care will have a complete paper file, the sample will be selected based on the date of first entry into foster care occurring prior to the implementation of the State's SACWIS. Depending on the length of time since the State converted to a new information system, this portion of the review may be modified to accommodate the State's situation.

It is not necessary to have computer terminals available for the entire team reviewing cases. However, at least one or two terminals should be available if it becomes necessary to verify information that may be found only on the system. One person from each of the State and Federal teams will be designated to look up any necessary information on the system.

#### Procedure

Once the State review team coordinator receives the list of encrypted or sequential case record numbers from the Federal review team coordinator, he/she should:

- □ Create a list to cross-reference the encrypted/sequential record number with the actual case record number.
- ☐ Arrange for the case files to be delivered to the State office by the first day of the on-site review
- □ Ensure that case records are as complete and up-to-date as possible, and include any files maintained separately, e.g., child protective services files, provider files, and eligibility files. All case records should include:
  - Court orders
  - Placement history
  - Caretaker (person child was removed from) information
  - Medical history
  - Biological parent file for the adoption records
  - Foster care records on children adopted (if the relevant AFCARS information cannot be found in the child's adoptive record)

**Note**: Sealed adoption records. If a sufficient number of cases cannot be identified for review due to their having been sealed, then the State will have to petition the court to open the records prior to the on-site review.

□ Identify and schedule staff to participate in the case file review. It is recommended that the State have field workers, supervisors and/or regional administrators participate in this part of the review. The overall agenda can be adjusted to allow field staff to participate.

#### F. FINALIZE THE ON-SITE AGENDA

Appendix I contains suggested schedules and a proposed agenda for a morning or afternoon entrance conference. The State review team coordinator should review the proposed agenda and make modifications as needed to accommodate the schedule of senior management for the entrance and exit conferences and of field staff for the case file review. Any changes to the overall agenda must be discussed with, and given to, the Federal review team coordinator. The agenda should also contain the names and titles of the State staff participating in each segment of the review.

Once the State review team coordinator has drafted the on-site agenda, it should be shared with the Federal review team coordinator for joint approval prior to the on-site visit.

## CHAPTER V: PROCEDURES FOR THE ON-SITE REVIEW PHASE

#### A. INTRODUCTION

The on-site review occurs over a period of five working days. The on-site review activities are conducted in a location determined by the State in collaboration with the ACF Regional office. The State capitol is generally the designated location since it is the location of the State agency central office/administrative staff, but another site may be mutually agreed upon. It is preferable to conduct the meetings in one large room to allow for the size of the team and materials needed for the review. A separate room can be added on the day of the case file review, as this activity will include additional staff and the case files. The room used for the case file review should be secure to protect the confidentiality of the case records.

During this week, the Federal team conducts an entrance conference, views the entry of a test case scenario, identifies and reviews its preliminary findings with the State team, and reviews case files. Once the on-site review process is complete, an exit briefing is held with the State review team and management officials. During the exit briefing a summary of the major strengths and error findings are presented. In addition to the briefing, draft documents of the team's preliminary on-site findings are left with the State team in order to allow them to begin making changes, if any, to the information system.

#### **B. THE REVIEW PROCESS**

1. Entrance Conference and Brief System Demonstration

The first day of the on-site visit begins with the entrance conference which serves to:

- Introduce the Federal team to State management, project staff, and State review team;
- Review the nature and scope of the on-site review;
- Respond to any questions the State staff might have related to the review process; and
- Make any final modifications to the on-site agenda.

Immediately following the entrance conference, the State should present a brief walk-through of the system that is used to extract the AFCARS information. The State should ensure that appropriate technical and programmatic staff participate in the demonstration. The Federal team will bring a test case scenario, and data from that case will be entered as part of the system demonstration. The purpose of this activity is to observe the entire process of entering data, extracting the data, and creating an AFCARS file. The State team will extract the case information that was entered during the demonstration for the Federal team.

Additionally, the staff will identify the information that was entered into the system from the test case scenarios during the pre-site visit phase.

#### 2. Documentation Review

This process is the core activity of an AFCARS assessment. It builds on the initial review and analysis conducted during the pre-site phase by the Federal team. The Federal team reviews the State's program code documentation, the data compliance reports, the data quality reports, the frequency reports of the most recent AFCARS submission, and the results of the test case scenarios collectively for each data element. During this phase of the review, the Federal team meets with the State team to go over each foster care and adoption element, the AFCARS general requirements, and the questions related to program and system policies and procedures.

This process involves identification of:

- any AFCARS element or value that does not have an element or value mapped to it from the State system;
- any relevant value in the State system that does not map to an AFCARS element;
- any elements or values where the State system definition does not appear to match the AFCARS definition;
- any of the State's data collection policies or procedures that may cause some data not to be reported to AFCARS, or to be reported inaccurately (i.e., not reflecting the true. circumstances of the case); and
- mapping and formatting errors that the State may have made in its most recent AFCARS submission.

# 3. Technical Analysis

This part of the review allows follow-up on any specific unresolved technical issues, such as encryption, data file format, or data file transmission.

#### 4. Case File Review

The purpose of this activity is to ensure that information that is submitted to AFCARS accurately reflects what is in the hard copy case records. This process may not identify new problems, but usually confirms the findings of the test case scenarios and the mapping process. The process involves all members of the State and Federal teams, technical and program.

The Federal team will provide forms for each record drawn for the sample. This form contains the data submitted by the State for each element in the record. There are four columns to the form (see Appendix J for an example):

- column one lists the data elements;
- column two lists the information submitted to AFCARS by the State;
- column three is for noting information found in the case record; and
- column four is marked if the information does not match.

#### Procedure

- ☐ The entire State and Federal team will review case files and will be divided into two groups. One group will review the foster care files and the other group will review the adoption files.
- □ An introductory briefing will take place before reviewing the cases.
- Once the team is finished reviewing the files, each team member will share with the group their significant findings. Once this process is completed, the Federal review team coordinator collects the forms.
- □ A preliminary analysis will be conducted by the Federal team on site and the results will be shared with the State team during the pre-exit conference meeting. Final analysis of these forms will be completed during the post-site visit review phase.

#### C. DOCUMENT REVIEW FINDINGS

## 1. Assigning Rating Factors

The two areas that are assessed during an AFCARS review are the AFCARS general requirements and the data elements. Each area is assessed to determine whether the State is fully meeting the requirements in the AFCARS regulation, policy guidance, and technical bulletins, and on the quality of the data submitted. Information that is collected from each of the components of the review is combined to assign a rating factor for each data element and the general requirements. A scale of 1 (does not meet AFCARS standards) to 4 (fully meets AFCARS standards) is used to assign a factor. Exhibit 3 in Chapter II lists the factors and definitions.

The State will have an opportunity to review the factor assigned to each element and general requirements, and to provide feedback during the review of the findings. A factor may be changed based on the discussion between the State and Federal team. These values are preliminary pending the completion of the review, and the numbers are subject to revision during the post-site visit review phase.

It is possible that the problem with the 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 by ACF. 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 fully meeting the AFCARS standard (a factor of "4") will not be given to the element until all system issues and/or data quality issues have been addressed.

At the time the general requirements are assessed, all specifications for the requirement must be met in order for the requirement to be found in fully meeting the AFCARS requirements. 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 are directly related to each other. When this occurs, all related elements are given the same factor. This is because incorrect programming logic could affect the answers to all of the related data elements.

# 2. Findings Document

The findings will be documented in three tables, one for adoption, one for foster care, and one for the general requirements. The tables include notes, comments and significant findings of the review for each data element and general requirement.

A preliminary draft of the tables are completed by the Federal review team on-site and shared with the State review team prior to the exit conference with the State agency administrators. The Federal and State team will review the findings in order to ensure agreement on the action items. See Appendix K for an example of the documents that will be shared during the exit conference.

#### D. EXIT CONFERENCE

The purpose of the exit conference is to:

- Present specific findings resulting from the review process
- Report the preliminary recommendations and/or proposed resolutions to outstanding issues
- Answer any questions that the State agency administrators might have as a result of the review

The exit conference should include all staff members that were involved with the review during the week and senior management staff.

A one-page summary of the review findings will be distributed during the exit briefing.

#### CHAPTER VI: PROCEDURES FOR THE POST-SITE VISIT PHASE

#### A. INTRODUCTION

This phase should last no more then 60 business days from the end of the on-site visit. The post-review phase involves a final assessment of the information gathered during the on-site review, including the findings. A report is written detailing the major findings from the assessment review, with copies attached of all of the detailed findings. This report is signed by the Associate Commissioner of the Children's Bureau and mailed to the State agency.

#### B. FINALIZE FINDINGS AND ISSUE THE FINAL REPORT

### 1. Findings.

Although the major portion of the AFCARS evaluation will be conducted on-site, a number of steps in the assessment and documentation process may be completed during the post-site visit phase. These steps include consolidation of documentation from all members, consultation among Federal team members, and a final analysis of all findings, documentation, and (if applicable) revised program code. The Federal review team coordinator may contact the State with additional questions or request additional information.

# 2. Final Report.

The final report will be issued to the State within 60 business days after the completion of the onsite review. The purpose of the final report is to document the findings of the AFCARS assessment review, including the agency's strengths, areas needing improvement, and changes necessary to meet all of the AFCARS requirements at 45 CFR 1355.40.

The AFCARS assessment review report to the State will include:

- A cover letter;
- An introduction that provides an overview of the background and purpose of the review;
- A summary of the findings and required changes; and
- The completed findings and the AFCARS improvement plan matrices.

# 3. Dissemination of the Final Report

The Children's Bureau will provide copies of the report to the appropriate officials at the State agency, CFS review staff, the Children's Bureau's Division of State Systems, and the ACF Regional Office. The final report will be posted on the AFCARS web page.

All documentation is retained by ACF as part of the permanent archive file on the State's AFCARS.

#### C. AFCARS IMPROVEMENT PHASE

If there are deficiencies that must be corrected in order for the State to meet the requirements established in the AFCARS Federal regulation at 45 CFR 1355.40, then the State will enter the AFCARS Improvement Phase. This phase begins once the State receives the report and improvement plan and ends when the State has made all system changes and the quality of the data has improved and remains consistent. The elements/general requirements that receive a "3" or lower will make up the action items in the plan. Each requirement will be grouped by the factor it received. For an example of an AFCARS Improvement Plan, see Appendix L.

The format of the AFCARS Improvement Plan includes the following columns:

- Data Elements or General Requirement;
- Rating Factor;
- Findings;
- Tasks;
- Estimated/Completion Date; and,
- Comments.

The Improvement Plans that are included with the report will not include due dates. After the site visit the State should begin planning timeframes for implementing the action items that are listed in the draft findings documents. Once the State receives the final report, it must contact the ACF Regional office within 30 days (either by letter or telephone) 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. A factor to take into consideration when developing a schedule for completing the task items would be when the State is scheduled to have its Child and Family Services Review.

The State should make the changes to the information system and/or data entry in order to meet the applicable requirements and standards in as timely a manner as possible. Inasmuch as the AFCARS data are used for several significant activities at the Federal and State level, the State's implementation of the task items will be a contributing factor to improving the quality of its data.

#### Procedure

- o At the end of the on-site review, draft estimated due dates for each action item.
- Request electronic copies of the AFCARS Improvement Matrices from the Federal Regional Office.
- o Submit to ACF within 30 days of the receipt of the report the State's estimated due dates for each action item.
- ACF will respond within 30 days to the State with its approval of the estimated due dates.
   ACF may contact the State prior to giving approval with any questions or concerns regarding the States estimated timeframes.

#### D. PROGRESS REPORTS

The State should provide quarterly updates of its progress to the Regional Office. Additionally, the plan for implementing the changes to the system and for training case workers should be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). The electronic AFCARS improvement plans will be used by the State and ACF for tracking changes, notes and ACF's approval of completed items. The State can e-mail the Regional Office this document with the completion dates and any notes on what the State has accomplished.

Once the State has completed the AFCARS improvement plan, and the State and ACF are satisfied with the improvement in the quality and accuracy of the data, the Children's Bureau will send a letter to the State. The letter will include a summary of the actions taken by the State, the completed AFCARS improvement plan, and a summary of the final findings.

#### E. TECHNICAL ASSISTANCE

The ACF Regional Office will work with the States to identify technical assistance needed to implement the AFCARS Improvement Plan. The State may access information on 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. For on-site technical assistance from the NRC-ITCW, contact your ACF Regional Office.