

STATE OF WISCONSIN
Department of Health and Family Services
Division of Children and Family Services

To: Area Administrators/Human Services Area Coordinators
Bureau Directors
County Departments of Community Programs Directors
County Departments of Developmental Disabilities
Services Directors
County Departments of Human Services Directors
County Departments of Social Services Directors
Licensing Chiefs/Section Chiefs
Tribal Chairpersons/Human Services Facilitators

From: William R. Fiss 

Re: Out-of-Home Placement Data Update

The Division of Children and Family Services (DCFS) will be working with counties and the Bureau of Milwaukee Child Welfare (BMCW) to correct eWiSACWIS data used for Federal Adoption and Foster Care Review and Reporting System (AFCARS) submissions and placement documentation errors that overstate the rate of re-entry to placement in Wisconsin. This memo explains the need for assistance by local agencies to correct placement documentation and meet Federal performance standards.

Background

AFCARS Review

A review of the Wisconsin AFCARS reporting was conducted by the Federal Administration for Children and Families (ACF) the week of July 10, 2006. The Federal review examined the collection of placement data submitted in the AFCARS Foster Care file and adoption data submitted in the AFCARS Adoption file to assess compliance with federal reporting requirements and evaluate data quality for program management purposes. States are required by Federal law and regulation to collect data on children in foster care and those who have been adopted through the involvement of the State child welfare agency. States that fail to meet AFCARS reporting standards set forth in 45 CFR 1355.40(a-d) are considered not to be in substantial compliance with Title IV-E requirements and may be subject to Federal penalties.

The DCFS received the Federal AFCARS review report in November 2006, and submitted to ACF in January 2007 an AFCARS Improvement Plan to address areas requiring data correction, training, eWiSACWIS enhancements, or AFCARS file coding improvements based on the AFCARS review findings. DCFS is implementing AFCARS file code improvements and minor system changes in 2007 through eWiSACWIS maintenance releases. More significant system changes regarding race and disability information will be pursued beginning in 2008.

Some key training issues from the AFCARS review are listed in the attachment to this memo. DCFS will be updating the eWiSACWIS placement guide and discussing these issues with child welfare staff at regional meetings. A significant data quality issue cited in the review findings was the lack of complete placement history information for some children, particularly related to cases that were converted to eWiSACWIS when agencies implemented the system. DCFS will be working individually with counties to correct these conversion cases using the Placement History Correction window in eWiSACWIS.

Re-entry Rate

The national performance standard for re-entry to foster (out-of-home) care (Permanency Outcome 1 in the Program Enhancement Plan) is, that of all children who entered foster care during a reporting period,

8.6% or fewer re-entered foster care within 12 months of a prior foster care episode. Wisconsin established a baseline performance level through negotiations with ACF on the Program Enhancement Plan (PEP) of a 22.2% re-entry rate, with an improvement target set at 20.15% by the end of the PEP period. Based on AFCARS submissions during the PEP, the Wisconsin re-entry rate has not decreased and remains above the 20.15% improvement target.

Calendar Year	2002	2003	2004	2005	Prelim 2006
Re-entry Rate	22.2%	21.5%	22.4%	22.5%	23.3%

As a result of not meeting the improvement target of 20.15%, Wisconsin will remain subject to Federal monitoring of the re-entry rate. If the 20.15% improvement target is not met by November 2007, the State could be at risk of financial penalties that would reduce Title IV-E revenue and the penalties would increase in future years for continued non-compliance with the improvement target.

The Wisconsin re-entry rate is overstated in eWiSACWIS due to the way some counties document placement changes and the use of juvenile justice facilities. Placement changes are sometimes reported as discharges, giving the appearance of re-entries. The re-entry rate is also affected when shelter and detention are reported as out-of-home care placements in eWiSACWIS.

To meet the 20.15% re-entry rate improvement target, DCFS will be working with individual counties to review reporting errors related to placement changes and how use of juvenile justice facilities is reported. Corrections will be necessary to placement discharges and subsequent removals will be needed along with changing some juvenile justice placements to in-home services. Corrections will be pursued for current cases and cases open during 2006 so that Federal Fiscal Year (FFY) 2006 AFCARS data can be resubmitted and more accurate data provided for FFY 2007.

Data Correction Responsibilities and Timeline

Each county and the BMCW will be provided with a list of cases where children have been identified to have AFCARS placement-related data errors and/or where there may be an error in placement documentation that improperly denotes the re-entry of the child into out-of-home care. The list will show cases and children within the case and be provided by to each county and the BMCW listing these cases by Site, Supervisor and Worker. For the affected children, the specific AFCARS elements that are identified to be in error and/or placement discharge and removal dates that reflect an improper re-entry to out-of-home care will be provided.

Data correction for all identified children and error types should be completed by April 2007 to ensure that corrections made by counties and the BMCW are reflected in the next AFCARS submission in May 2007.

Technical Assistance Resources

The corrections to these types of errors will be made using the Placement History Correction windows. Additional detail regarding how to use this functionality is provided in a webcast presentation at the following website:

<http://media1.wi.gov/DHFS/Viewer/Viewers/Viewer240TL.aspx?mode=Default&peid=374c7b29-8fda-4052-ac1f-3d5d8be4f6f4&pid=7c467164-c6ca-4a08-9777-eb5e089b83c5&playerType=WMM7>

In addition to the above webcast, the following websites offer a Quick Reference Guide and a FAQ document related to the Placement History Correction functionality:

Quick Reference Guide:

http://dhfs.wisconsin.gov/wisacwis/knowledge_web/Helpdesk/quick_ref_guides/ewisacwis_quick_ref_guides/Miscellaneous/Placement_Correction.pdf

FAQ:

http://dhfs.wisconsin.gov/wisacwis/knowledge_web/Helpdesk/quick_ref_guides/ewisacwis_quick_ref_guides/Miscellaneous/FAQ_Placement_History_Correction.pdf

Area Administration (OSF-AA) and DCFS staff will follow up with as necessary to assist counties and the BMCW in identifying and correcting both the identified AFCARS errors and the potential re-entry errors. In addition, counties and the BMCW will continue to have access to the AFCARS Exception report (CM2102), the Re-entry into Out-of-Home Care report (SM10a24) as well as the new Placement Correction report (SM10a33) via eWRports to assist in identifying children where there are AFCARS and placement-related data entry errors. Counties are encouraged to review these reports on an ongoing basis to monitor data quality.

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MEMO WEB SITE:

http://dhfs.wisconsin.gov/dcfs_info

Infomemo/dcfs/AFCARS.doc