



December 12, 2022

Foster Care Education Initiative – Status Report

Members of the Legislative Audit Committee:

Attached are the status reports from the Colorado Department of Education (CDE) and the Colorado Department of Human Services (CDHS) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) *Foster Care Education Initiative Performance Audit*.

OSA Review of Documentation

As part of the status report process, we requested and received supporting documentation for each recommendation that CDE and CDHS reported as having been implemented. Specifically, we reviewed the following documentation:

- New legislation and statutory changes.
- The data dictionary agreed upon by both departments that defines fields in CDE's Data Warehouse and CDHS' Trails databases and how to match the fields when exchanging data about students in foster care.
- Documentation of new file sharing processes and data queries.
- Documentation and examples of new data analysis matching processes and reporting schedules, which ensures that data is regularly exchanged per statutory requirements.
- The job description of the individual responsible for evaluating and researching data processes for CDE.

Based on our review, the supporting documentation substantiates CDE's and CDHS' reported implementation statuses.



COLORADO
Department of Education

Commissioner's Office
201 East Colfax Avenue
Denver, CO 80203-1799

Kerri L. Hunter, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

November 1, 2022

RE: Foster Care Education Initiative Status Report

Dear Auditor Hunter:

In response to your request, we have prepared the attached status report on the implementation status of audit recommendations contained in the Foster Care Education Initiative Performance Audit. The report provides a brief explanation of the actions taken by the Colorado Department of Education to implement each recommendation.

We greatly appreciate our partnership with the Colorado Department of Human Services in implementing the recommendations.

If you have any questions about this status report and the Department of Education's efforts to implement the audit recommendations, please contact Danielle Ongart at 3030-501-3968 or ongart_d@cde.state.co.us.

Sincerely,

A handwritten signature in black ink that reads "Katy Anthes".

Katy Anthes, Ph.D.
Commissioner of Education



Audit Recommendation Status Report

Audit Name:	Foster Care Education Initiative
Audit Number:	2053P
Agency:	Department of Education
Date of Status Report:	November 1, 2022

Section I: Summary				
Rec. Number	Response from Audit Report	Original Implementation Date	Current Implementation Status	Current Implementation Date
1A	Agree	February 2023	Partially Implemented	February 2023
1B	Agree	February 2023	Implemented	May 2022
2A	Agree	January 2023	Partially Implemented	January 2023
2B	Agree	August 2022	Implemented	August 2022
2C	Agree	June 2022	Implemented	June 2022
2D	Agree	March 2023	Partially Implemented	March 2023

Section II: Narrative Detail

Recommendation 1A

The Colorado Department of Education (CDE) should leverage the educational data it maintains to help increase awareness and understanding of educational outcomes for students in foster care by working with the General Assembly to clarify its intent in requiring CDE to track and report data on students in foster care, define practical ways that CDE may fulfill the statutory purposes of data sharing with the Department of Human Services (DHS) (i.e., accountability, program improvement, and research), and pursue legislation to specify any requirements in statute.

Current Implementation Status Partially Implemented

Current Implementation Date February 1, 2023

Status Update Narrative

The official audit findings were presented to the State Legislative Audit Committee on February 22, 2022. During that hearing, the State Legislative Audit Committee asked the auditors to work with the CDE and DHS teams to provide recommendations on the metrics needed to track and report data on students in foster care, define practical ways that CDE may fulfill the statutory purposes of data sharing with DHS, and pursue legislation to specify any requirements in statute.

Between the February 22 and March 8, 2022 State Legislative Audit Committee meetings, CDE worked with DHS, the state audit team, and Rep. Michaelson Jenet, as well as a bill drafter, to write potential legislation related to the audit findings and the conversation at the February 22, 2022 meeting.

On March 8, 2022, CDE, DHS and the state audit team presented their recommendations for potential legislation to the State Legislative Audit Committee. The State Legislative Audit Committee approved moving forward on providing details to the recommendations offered, including information on a fiscal note. This information was provided to the State Legislative Audit Committee on March 22, 2022. As shown in the meeting minutes, the Committee did not have enough votes to move the draft legislation forward and introduce it in the General Assembly.

Representative Michaelson Jenet introduced similar content as House Bill (H.B.) 22-1374, the Foster Care Success Act, during the 2022 legislative session. The bill included some of the information, recommendations and fiscal note content that was presented to the State Legislative Audit Committee. H.B. 22-1374 was passed into law on May 31, 2022 and addresses the General Assembly's intent for CDE to track and report data on students in foster care. This portion of the recommendation has been implemented.

	<p>The terms accountability, program improvement and research have been modified to provide further clarification as required in H.B. 22-1374. The new terms are: “tracking outcomes related to student success, education attainment, and strengthening local service delivery to support educational attainment.” CDE hired an experienced evaluator who is working with both CDE and DHS on defining these terms for the purposes of data sharing between both agencies. This information will be provided in the Foster Care Education Initiative’s annual legislative report, due by February 1, 2023 to the State General Assembly (this due date is outlined in H.B. 22-1374). Per statute (C.R.S. 22-32-138(9)), the report will also include information on program implementation and performance metrics of students identified in the foster care education initiative. This portion of the recommendation has been partially implemented.</p>
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Recommendation 1B	
<p>The Colorado Department of Education (CDE) should leverage the educational data it maintains to help increase awareness and understanding of educational outcomes for students in foster care by identifying metrics that would provide meaningful insight about students in foster care, and then working with the General Assembly to pursue legislation that requires ongoing, routine tracking and reporting of that information.</p>	
Current Implementation Status	Implemented
Current Implementation Date	May 2022
Status Update Narrative	<p>The metrics referenced in this finding were identified with input from the state audit team, CDE, DHS and members of the State Legislative Audit Committee (more details outlined in the response to finding Recommendation 1A above) and are now provided in statute via H.B. 22-1374. H.B. 22-1374 further outlines expectations for routine tracking and reporting of the information through an annual Foster Care Education Initiative State Legislative Report due to the Colorado State Legislature by February 1st of each calendar year. This recommendation has been implemented.</p>

Recommendation 2A	
<p>The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE’s tracking of students who are in foster care by ensuring that the data DHS provides to CDE is based on a methodology that includes all children who were in foster care during a given year, regardless of when they were placed in foster care.</p>	
Current Implementation Status	Partially Implemented
Current Implementation Date	January 2023

Status Update Narrative	CDE worked with DHS to better coordinate the data sharing and matching process. DHS began sending CDE monthly data files in July 2022 and has continued into October 2022. These data files include all children in out-of-home placement. This file contains records from the beginning of the school year through the current month. The query DHS used to pull this file also no longer has the new services limiter previously used by DHS. This file has an agreed upon format for data fields which need to be included in the sharing and the file includes a field which indicates the exit date for foster students. Since receipt of the first file in the updated format in July 2022 (reflecting the updates made in June 2022), CDE has refined internal documentation and its overall matching process. This has resulted in a more efficient method in processing the data for the Student October and Student End of Year collections. These process updates will be validated in January 2023 with the release of CDE’s 2022-23 Student October data collection and 2021-22 Student End of Year data.
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Recommendation 2B	
The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE’s tracking of students who are in foster care by developing and documenting a more robust data-matching process, including specifying which fields the departments will use to match records and how they can identify records associated with the same child despite data entry differences that may be present between their data systems.	
Current Implementation Status	Implemented
Current Implementation Date	August 2022
Status Update Narrative	CDE improved its existing documentation for the matching process by detailing the steps in the automated and manual data matching processes, including the specific fields in Data Warehouse and logic used and each step of the process. In August 2022, CDE provided DHS a copy of this documentation and requested DHS input. This documentation describes a multiple pass matching process, similar to the example multiple step matching algorithm provided by DHS and clarifies that CDE only has access to data reported by districts in the public school system. Through this multiple match process, the work described above in relation to the agreed upon file format (also known as a data dictionary), and monthly files returned to DHS (with the matched name, date of birth (DOB), DHS client ID, and State Assigned Student Identifier (SASID)), DHS and CDE have worked to address data quality concerns and the best way to standardize data between the two agencies. CDE also shares a list of individuals who did not match each month. In August 2022, DHS and CDE began comparing outcomes from the matching

	process, according to the common dataset shared between the agencies, to analyze the validity of the data in both systems.
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Recommendation 2C	
The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE’s tracking of students who are in foster care by ensuring that each department provides data to one another on the frequency required by the departments’ memorandum of understanding (MOU).	
Current Implementation Status	Implemented
Current Implementation Date	June 2022
Status Update Narrative	CDE and DHS have worked together to set up a system for DHS to send CDE monthly data files, as required by the departments’ current (as of October 2022) MOU. CDE then provides files back to DHS on a monthly basis with the State Assigned Student Identifier (SASID) for the students in the data file that DHS sent to CDE. CDE will also provide outcomes data to DHS upon their request, in accordance with the MOU.

Recommendation 2D	
The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE’s tracking of students who are in foster care by updating the MOU to reflect the departments’ actual data-sharing process, which could include a reference in the MOU to a separate document that outlines the data-matching algorithm developed in response to Part A.	
Current Implementation Status	Partially Implemented
Current Implementation Date	March 2023
Status Update Narrative	A revised Data Sharing Agreement (DSA)/MOU will be completed once the underlying systems are put in place and vetted. CDE is still in the process of implementing recommendation 2A. The data processing and matching documentation has been created (as described in the response to recommendation 2B) but may need refinements as the new process is implemented and validated for the data collections (Student October and Student End of Year) which incorporate data on out-of-home placements. As DHS and CDE continue to collaboratively refine the data sharing and matching process now that the initial updates to the process have been made, the documentation will be revised to include a clear communication plan about how to manage updates between the agencies as they need to be made. The current documentation was shared with DHS via email and is also stored in the shared Synclicity folder used by DHS and CDE data analysts. The MOU will be updated to reference this documentation and will include updates to the process once the data processes are validated in January 2023

	and any revised data sharing processes are confirmed by early 2023.
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11/02/2022

Kerri L. Hunter, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

Dear Auditor Hunter:

In response to your request, we have prepared the attached status report on the implementation of audit recommendations contained in the Foster Care Education Initiative Performance Audit. The report provides a brief explanation of the actions taken by the Colorado Department of Human Services (CDHS) to implement each recommendation.

The Colorado Department of Human Services has partnered with the Colorado Department of Education (CDE) to implement the recommendations from the audit effectively and efficiently. We look forward to continuing our implementation efforts in partnership with CDE to improve educational outcomes for children and youth in foster care in Colorado.

If you have any questions about this status report and the Department of Human Services' efforts to implement the audit recommendations, please contact Minna Castillo-Cohen at 303-866-4544 or minna.castillocohen@state.co.us.

Sincerely,

Michelle Barnes
Executive Director, Colorado Department of Human Services



Audit Recommendation Status Report

Audit Name:	Foster Care Education Initiative
Audit Number:	2053P
Agency:	Department of Human Services
Date of Status Report:	November 3, 2022

Section I: Summary				
Rec. Number	Response from Audit Report	Original Implementation Date	Current Implementation Status	Current Implementation Date
2A	Agree	January 2023	Implemented	June 2022
2B	Agree	August 2022	Implemented	June 2022
2C	Agree	June 2022	Implemented	June 2022
2D	Agree	March 2023	Partially Implemented	March 2023

Section II: Narrative Detail

Recommendation 2A

The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE's tracking of students who are in foster care by ensuring that the data DHS provides to CDE is based on a methodology that includes all children who were in foster care during a given year, regardless of when they were placed in foster care.

Current Implementation Status	Implemented
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Current Implementation Date	June 2022
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Status Update Narrative	<p>CDHS reviewed the previously created queries for the data sharing and finalized a comprehensive query that includes all children and youth in an out-of-home placement during the given time period. Children and youth in the dataset will appear regardless of when they were placed in out of home care. The query was shared to CDE as a text file.</p>
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The query follows the recommended guidelines and does not include adoption, subsidized adoption, relative guardianship, and legal risk adoption as valid out-of-home placement types. The specified child or youth must be either an active child in the case (Child Welfare) or a student (Youth Services). The query does remove placements that were opened in error.

Recommendation 2B

The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE's tracking of students who are in foster care by developing and documenting a more robust data-matching process, including specifying which fields the departments will use to match records and how they can identify records associated with the same child despite data entry differences that may be present between their data systems.

Current Implementation Status	Implemented
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Current Implementation Date	June 2022
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Status Update Narrative	<p>CDE and CDHS completed a data dictionary that detailed the field name, format, length, and description. The dictionary also provided clarification of CDE and CDHS program practice that would inform requested data.</p>
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The CDHS data dictionary included the following data fields: CDHS Client ID, Birth Date, First Name, Middle Name, Last Name, Gender, CDHS Case ID, Removal Begin Date, Removal End Date, Placement Start Date, Placement End Date, Permanency Type, Placement Leave Reason, Service Type, First Removal Date, Case Closure Date, and County. The client's social security number was also included as an optional field for

	matching but was agreed upon as not necessary for the data matching process.
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Recommendation 2C	
The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE's tracking of students who are in foster care by ensuring that each department provides data to one another on the frequency required by the departments' memorandum of understanding (MOU).	
Current Implementation Status	Implemented
Current Implementation Date	June 2022
Status Update Narrative	<p>CDHS has provided timely data files to CDE via a secure data sharing portal within the first week of every month. CDHS has also been responsive in updating any required data dates and providing notification to CDE. CDHS has received matched files back from CDE which contain the CDE student information, the State Assigned Student Identifier (SASID), and the matching information from Trails.</p> <p>The exact dates of the transfer occurred on: July 5, 2022 August 2, 2022 September 5, 2022 October 6, 2022</p>

Recommendation 2D	
The Colorado Department of Education (CDE) and Department of Human Services (DHS) should work together to improve CDE's tracking of students who are in foster care by updating the MOU to reflect the departments' actual data-sharing process, which could include a reference in the MOU to a separate document that outlines the data-matching algorithm developed in response to Part A.	
Current Implementation Status	Partially Implemented
Current Implementation Date	March 2023
Status Update Narrative	<p>CDHS provided an example of a multi-tiered data-matching algorithm that matches on different combinations of first name, last name, sex at birth, and birth date in June 2022.</p> <p>CDHS will complete the Data Sharing Agreement (DSA) with CDE once the CDE systems are finalized and vetted. CDHS will finalize the requested data fields, upload timeframes, and annual review date with CDE.</p>