During the week of July 28 to August 1, 2008, a team of DSS staff from state office and surrounding counties conducted an onsite review of child welfare services in Allendale County. A sample of open and closed foster care and treatment cases were reviewed. Also reviewed were screened out intakes, foster home licensing records, and unfounded investigations. Stakeholders interviewed for this review included foster parents, foster child, Allendale DSS supervisor and workers, representative from the schools, Foster Care Review Board, Mental Health and Guardian Ad Litem Program.

### Period under Review: July 1, 2007 to June 30, 2008 Purpose

The Department of Social Services engages in a review of child welfare services in each county to:

- a) Determine to what degree services are delivered in compliance with federal and state laws and agency policy; and
- b) Assess the outcomes for children and families engaged in the child welfare system.

#### State law (§43-1-115) states, in part:

The state department shall conduct, at least once every five years, a substantive quality review of the child protective services and foster care programs in each county and each adoption office in the State. The county's performance must be assessed with reference to specific outcome measures published in advance by the department.

The information obtained by the child welfare services review process will:

- a) Give county staff feedback on the effectiveness of their interventions.
- b) Direct state office technical assistance staff to assist county staff with their areas needing improvement.
- c) Inform agency administrators of which systemic factors impair county staff's ability to achieve specific outcomes.
- d) Direct training staff to provide training for county staff specific to their needs.

#### **Quantitative and Qualitative Data Sources**

The county-specific review of child welfare services is both quantitative and qualitative.

The review is **quantitative** because it begins with an analysis of every child welfare outcome report for that county for the period under review. The outcome reports reflect the performance of the county in all areas of the child welfare program: Child Protective Services (CPS) Intake, CPS Investigations, CPS In-Home Treatment and Foster Care.

The review is **qualitative** because it assesses the quality of the services rendered and the effectiveness of those services. The review seeks to explain why a county's performance data looks the way it does.

### **Ratings**

The standard that must be met for all items reviewed onsite is 95%. Each outcome report has its own standard. To be rated an area of **Strength** most items must meet both the qualitative onsite review standard **and** the quantitative outcome report standard.

Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect.

The county's performance on this outcome is based on the rating of two items:

1) Timeliness of initiating investigations

Strength

2) Repeat Maltreatment

Strength

<b>Agency Data</b>	1			
Performance I	Measure 1: Timelines	ss of Initiating Inve	stigations on Repo	rts of Child
Maltreatment		_		
Objective: 10	00% in <= 24 hours (	state law)		
	Number of	Number of	Percent of	Numbers of
	Determinations	Investigations	Investigations	Investigations
		Initiated Timely	Initiated Timely	Above (Below)
		-		Objective
State	18,570	18,002	96.94%	-568
Allendale	36	33	91.67%	-3

#### **Explanation of Item 1: Timeliness of Initiating Investigations**

This is an area of **Strength** for Allendale DSS. State law requires that an investigation of all (100%) accepted reports of abuse and neglect be initiated within 24 hours. Reviewers looked at all of Allendale County's cases and found that all investigations were initiated on time. Reviewers also found that the agency was appropriately assigning risk ratings to investigations. Because of data entry errors agency data indicates that three investigations were not initiated within the required timeframes.

# **Agency Data**

**Item 2: Treatment Cases With No New Indicated Reports** – Of all treatment cases that were closed during the year reporting period, what percentage did NOT have a new founded intake within 12 months of the treatment case being closed?

Report Period: 06/1/07 to 05/31/08

Objective: $\geq Ag$	gency Average			
	Number of Number of		Percent of Treatment	Number of
	Treatment Cases Closed	Treatment Cases with no founded intake within 12 months	Cases that did not have a new founded intake within 12 months	Cases Above (Below) State Average
State	5,257	4,618	87.84%	
		,		
Allendale	21	20	95.24%	1.6

Onsite Review Findings						
Safety Item 2: Repeat Maltreatment						
		Area Needing				
	Strength		Improvement		Not Applicable	
	#	%	#	%	#	%
Foster Care	9	100	0	0	0	0
Treatment	9	90	1	10	0	0
Total Cases	18	95	1	10	0	0

#### **Explanation of Item 2: Repeat Maltreatment**

This is an area of **Strength** for Allendale DSS. This item measures the occurrence of maltreatment among children under agency supervision. Reviewers found that 95% of the children under agency supervision did not experience additional maltreatment. Those findings were supported by agency data.

Safety Outcome 2: Children are safely maintained in their homes whenever possible and appropriate.

The county's performance on this outcome is based on the rating of two items:

3) Services to family to protect children and prevent removal

Strength

4) Risk of Harm

Strength

#### **Onsite Review Findings** Safety Item 3: Services to Family to Protect Child(ren) in Home and Prevent Removal Area Needing Improvement Strength Not Applicable # % # % # % Foster Care 3 100 0 0 6 0 Treatment 10 100 0 0 0 0 100 0 0 Total Cases 13 6 0

#### **Explanation of Item 3: Services to Family to Protect Children and Prevent Removal**

This is an area of **Strength** for Allendale DSS. This item assesses whether services were adequate to protect children in their home and prevent their removal and placement into foster care. Reviewers determined that the decision to remove the children from their homes and place them in foster care was appropriate in every case. Reviewers found that the services needed to ensure the safety of the children who remained with their parents or relatives were also appropriate.

Onsite Review 1	Findings					
Safety Item 4:	Risk of Harm					
			Area No	eeding		
	Strei	Strength		Improvement		pplicable
	#	%	#	%	#	%
Foster Care	9	100	0	0	0	0
Treatment	10	100	0	0	0	0
Total Cases	19	100	0	0	0	0

#### **Explanation of Item 4: Risk of Harm**

This is an area of **Strength** for Allendale DSS. This item assesses whether the agency's intervention reduced risks of harm to children. Reviewers determined that risk of harm was adequately managed in every case.

Permanency Outcome 1: Children have permanency and stability in their living situations.

The county's performance on this outcome is based on the rating of six items:

5)	Foster care re-entries	Strength
6)	Stability of foster care placement	Strength
7)	Permanency goal for child	Strength
8)	Reunification or permanent placement with relatives	Strength
9)	Adoption	Strength
10)	D 1 CA1, ( D) 1	

10) Permanency goal of Alternate Planned Permanent Living Arrangement (APPLA)

**Area Needing Improvement** 

### **Agency Data**

**Performance Measure 7**: **Foster Children Who Do Not Re-Enter Care** – Of all children discharged from foster care to reunification in the 12 month period prior to reporting period, what percentage did Not re-enter foster care within 12 months of the date of their discharge from the prior foster care episode.

<b>Objective:</b> > 90.1% (federal standard)							
	Number of	Number of Number of Children I		Number of			
	Foster Children	Who Did NOT	Who Did	Children			
	Reunified	Re-enter Foster Care	NOT Re-Enter	Above			
	During	Within 12 Months	Foster Care Within	(Below)			
	Reporting Period		12 Months	Objective			
State	2591	2406	92.86	71.5			
Allendale	4	4	100%	.4			

#### **Explanation of Item 5: Foster Care Re-entries**

This is area of **Strength** for Allendale DSS. This item measures the frequency of children reentering foster care within a year of discharge. To meet the minimum requirement for this item, 90.1% of children must not re-enter foster care within a year of discharge. None of the children reunified with their families during the period under review re-entered foster care.

### **Agency Data**

**Performance Measure 6**: **Stability of Foster Care Placements** – Of all children who had been in foster care at least 8 days but less than 12 months from the time of latest removal from home, the percentage that had no more than two placement settings.

<b>Objective:</b> >= 86% (federal standard)							
	Foster Care Services Open > 7 days and < 12 months	Number with No More than 2 placements	Percent with No More than 2 placements	Number Above (Below) Objective			
State	3,987	2,910	72.99%	(307.5)			
Allendale	16	16	100	3.1			

#### **Explanation of Item 6: Stability of Foster Care Placement**

This is an area of **Strength** for Allendale DSS. This item measures the frequency of placement changes for children in foster care, and assesses the reasons for those changes. The objective for this item is that at least 86% of the children can have no more than two placements within a year. Agency data shows that none of the Allendale DSS children experienced more than two placements during the period under review.

Onsite Review Findings						
Permanency Item 7: Permanency Goal for Child						
			Area Ne	eeding		
	Strength		Improvement		Not Applicable	
	#	%	#	%	#	%
Foster Care	9	100	0	0	0	0

#### **Explanation of Item 7: Permanency Goal for Children**

This is an area of **Strength** for Allendale DSS. This item evaluates the appropriateness of permanency goals for children in foster care and the timeliness of those permanency decisions. Reviewers found that in 100% of the cases, the agency identified the appropriate goal timely.

### **Agency Data**

**Performance Measure 8: Time to Achieve Reunification** – Of all children who were reunified with their parents or caretakers at the time of discharge from foster care and had been in care for 8 days or more, what percentage were reunified in less than 12 months from the date of their latest removal from home?

<b>Objective:</b> >= 75.2% (federal standard)					
	Number of Children	Number of Children	Percentage of	Number of	
	Returned to	Returned to	Children Returned to	Children	
	Parents/Caretakers	Parents/Caretakers	Parents/Caretakers	Above	
		after in Care <12	after in Care < 12	(Below)	
		months	months	Objective	
State	2,454	1,890	77.02%	44.6	
Allendale	15	12	80.00%	0.7	

#### **Explanation of Item 8: Reunification or Permanent Placement with Relatives**

This is an area of **Strength** for Allendale DSS. This item evaluates the activities and processes necessary to accomplish the goal of reunification with caregivers or placement with relatives. Agency data shows that 80% of the children who entered care during the period under review returned to parents or relatives within one year of entering care. This exceeded the 75.2% requirement. Reviewers found that children were returned home appropriately, without increasing the risk of harm to those children and without causing those children to re-enter care.

Onsite Review Findings						
Permanency Item 9: Length of Time to Achieve Adoption						
			Area Ne	eeding		
	Strength		Improvement		Not Applicable	
	#	%	#	%	#	%
Foster Care	5	100	0	0	4	0

#### **Explanation of Item 9: Adoption**

This is an area of **Strength** for Allendale DSS. This item evaluates the process within the child welfare system to achieve timely adoptions for children in foster care. The onsite review revealed that in 100% of the cases with this plan, adoptions were on target to being finalized within 24 months of the child's entry into foster care.

Onsite Review Findings							
Permanency Item 10: Permanency Goal of Alternate Planned Permanent Living Arrangement (APPLA)							
			Area No	eeding			
	Stren	gth	Improvement		Not Applicable		
	#	%	#	%	#	%	
Foster Care	2	67	1	33	6	0	

#### **Explanation of Item 10: Permanency Goal of APPLA**

This is an **Area Needing Improvement** for Allendale DSS. This item evaluates the appropriateness and effectiveness of services provided to children with the permanency plan of APPLA. Reviewers also rate whether the agency attempted to locate and reassess relatives or non-relatives that were willing to commit to the youth's long-term care. This was the deficiency causing this item to need improvement.

Permanency Outcome 2: The continuity of family relationships and connections is preserved for children.

The county's performance on this outcome is based on the rating of six items:

J 1	C
11) Proximity of foster care placement	Strength
12) Placement with siblings in foster care	Strength
13) Visiting with parents and siblings in foster care	Strength
14) Preserving connections	<b>Area Needing Improvement</b>
15) Relative placement	<b>Area Needing Improvement</b>
16) Relationship of child in care with parents	Strength

Onsite Review Findings									
Permanency Item 11: Proximity of Foster Care Placement									
			Area N	leeding					
	Stren	Strength		Improvement		Not Applicable			
	#	%	#	%	#	%			
Foster Care	9	100	0	0	0	0			

#### **Explanation of Item 11: Proximity of Foster Care Placement**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's efforts to keep children close enough to their families so that essential relationships can be maintained. Reviewers determined that in 100% of the cases, children were placed either within the county or in an adjacent county due to their therapeutic needs.

Onsite Review Findings									
Permanency Item 12: Placement with Siblings									
			Area N	leeding					
	Strength		Improv	vement	Not Ap	plicable			
	#	%	#	%	#	%			
Foster Care	7	100	0	0	2	0			

#### **Explanation of Item 12: Placement with Siblings in Foster Care**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's efforts to keep siblings together when it is appropriate to do so. In every case, the agency did a good job of placing siblings together when it was in the children's best interest to be placed together.

Onsite Review Findings									
Permanency Item 13: Visiting with Parents and Siblings in Foster Care									
			Area No	eeding					
	Stre	Strength		ement	Not Ap	plicable			
	#	%	#	%	#	%			
Foster Care	7	100	0	0	2	0			

### **Explanation of Item 13: Visiting with Siblings in Foster Care and with Parents**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's efforts to ensure that visits occur between children in foster care and their siblings and parents. This was an area of strength in every case because the agency planned visits between children in care with their parents and siblings, and those visits occurred as planned.

Onsite Review Findings									
Permanency Item 14: Preserving Connections									
			Area Ne	eeding					
	Strength		Improv	ement	Not Applicable				
	#	%	# %		#	%			
Foster Care	3	33	6	66	0	0			

#### **Explanation of Item 14: Preserving Connections**

This is an **Area Needing Improvement** for Allendale DSS. Whereas, Item 13 addressed parents and siblings, this item evaluates the agency's efforts to preserve children's connections to the people, places and things that are important to them. This was an area needing improvement because in 66% of the cases the agency did not make it possible for the children in care to maintain contact with identified relatives.

Onsite Review Findings									
Permanency Item 15: Relative Placement									
			Area N	leeding					
	Stre	ngth	Improv	vement	Not Applicable				
	#	%	#	%	#	%			
Foster Care	5	56	4	44	0	0			

#### **Explanation of Item 15: Relative Placement**

This is an **Area Needing Improvement** for Allendale DSS. This item evaluates the agency's efforts to identify and assess relatives as potential placement resources for children in foster care. In 44% of the cases the agency failed to assess either paternal or maternal relatives.

Onsite Review Findings									
Permanency Item 16: Relationship of Child in Care with Parents									
			Area Needing						
	Stre	Strength		ement	Not Applicable				
	#	%	#	%	#	%			
Foster Care	3	100	0	0	0	0			

#### **Explanation of Item 16: Relationship of Child in Care with Parents**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's efforts to promote a supportive relationship between children in care and their parents, beyond the twiceminimum visitation requirement. In 100% of the cases reviewed, reviewers found an increased parental involvement when the needs of children clearly called for it.

Well Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

The county's performance on this outcome is based on the rating of four items:

17) Needs and services of child, parents and caregivers Strength

18) Child and family involvement in case planning **Area Needing Improvement** 

19) Worker visits with child Strength

20) Worker visits with parents Strength

<b>Onsite Review</b>	<b>Findings</b>						
Well Being Iter	<b>n 17:</b> Nee	ds and Se	rvices of Chi	ld, Parents ar	nd Foster Parents		
			Area N	Area Needing			
	Stre	ngth	Impro	vement	Not Applicable		
	#	%	#	%	#	%	
Foster Care	9	100	0	0	0	0	
Treatment	10	100	0 0		0	0	
Total Cases	19	100	0	0	0	0	

### **Explanation of Item 17: Needs and Services of Child, Parents and Caregivers**

This is an area of **Strength** for Allendale DSS. This item asks two questions: 1) Were the needs of the child, parents, and caregivers assessed, and 2) Did the agency take steps to meet the identified needs? In foster care and treatment cases, the needs of the parents, foster parents and children were adequately assessed. The agency also provided services to alternate caregivers when a need was identified.

Onsite Review Findings									
Well Being Item 18: Child and Family Involvement in Case Planning									
			Area N	leeding					
	Strength		Improvement		Not Applicable				
	#	%	#	%	#	%			
Foster Care	5	56	4	44	0	0			
Treatment	9	100	0 0		1	0			
Total Cases	14	78	4	22	1	0			

#### **Explanation of Item 18: Child and Family Involvement in Case Planning**

This is an **Area Needing Improvement** for Allendale DSS. This item evaluates the agency's efforts to involve parents and children in the case planning process. Onsite reviewers found that in 100% of the treatment cases, age appropriate children, parents and caretakers were involved in the case planning process. However, in 44% of the foster care cases, there is no evidence that the agency involved age appropriate children in the case planning process.

Onsite Review Findings									
Well Being Item 19: Worker Visits with Child									
			Area N	leeding					
	Strength		Improv	vement	Not Applicable				
	#	%	#	%	#	%			
Foster Care	9	100	0	0	0	0			
Treatment	10	100	0 0		0	0			
Total Cases	19	100	0	0	0	0			

#### **Explanation of Item 19: Worker Visits with Child**

This is an area of **Strength** for Allendale DSS. This item measures the frequency of caseworker visits with children under agency supervision, and evaluates the quality of those visits. State law and agency policy requires that children under agency supervision be seen each month. Reviewers found that in both foster care and treatment cases reviewed, monthly face-to-face contacts were occurring as required by policy. The content of those visits addressed safety, permanency and child well-being issues. The majority of the visits occurred in the children's foster care setting or in their home.

Onsite Review Findings									
Well Being Item 20: Worker Visits with Parent(s)									
	Are			leeding					
	Stre	Strength		vement	Not Applicable				
	#	%	#	%	#	%			
Foster Care	2	100	0	0	7	0			
Treatment	10	100	0 0		0	0			
Total Cases	12	100	0	0	0	0			

#### **Explanation of Item 20: Worker Visits with Parents**

This is an area of **Strength** for Allendale DSS. This item measures the frequency of caseworker visits with parents, and evaluates the quality of those visits. Reviewers found that in both foster care and treatment cases reviewed, visits with parents and caregivers were occurring as required. The content of the visits also address relevant information.

Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.

The county's performance on this outcome is based on the rating of one item:

21) Educational needs of the child

Strength

Onsite Review Findings									
Well Being Item 21: Educational Needs of Child									
			Area N	leeding					
	Strength		Improvement		Not Applicable				
	#	%	#	%	#	%			
Foster Care	7	100	0	0	3	0			
Treatment	9	100	0	0	1	0			
Total Cases	16	100	0	0	4	0			

#### **Explanation of Item 21: Educational Needs of the Child**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's ability to assess and address the educational needs of children under agency supervision. This was an area of strength for every case. Reviewers found that workers made direct contact with the schools, guidance counselors and teachers as needed. There were also copies of grade reports and attendance records in both foster care and treatment cases.

Well Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

The county's performance on this outcome is based on the rating of two items:

22) Physical health of the child

Strength

23) Mental health of the child

**Area Needing Improvement** 

Onsite Review Findings									
Well Being Item 22: Physical Health of the Child									
			Area N	leeding					
	Strength		Improv	vement	Not Applicable				
	#	%	#	%	#	%			
Foster Care	9	100	0	0	0	0			
Treatment	10	100	0	0	0	0			
Total Cases	19	100	0	0	0	0			

#### **Explanation of Item 22: Physical health of the child**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's ability to assess and attend to the medical needs of children under agency supervision. This was an area of strength for every case. Reviewers determined that the medical and dental needs of the children were assessed and the identified medical needs were met. Copies of medical, dental and immunizations records were in all the cases, including BabyNet referrals completed on age appropriate children.

Onsite Review F	<u>indings</u>					
Well Being Item	<b>23:</b> Ment	al Health	of the Child			
			Area Needing			
	Strength		Improvement		Not Applicable	
	#	%	#	%	#	%
Foster Care	8	100	0	0	1	0
Treatment	4	67	2	33	4	0
Total Cases	12	86	2	14	5	0

#### **Explanation of Item 23: Mental Health of the Child**

This is an **Area Needing Improvement** for Allendale DSS. This item evaluates the agency's ability to assess and meet the mental health needs of children under agency supervision. In 100% of the foster care cases reviewed, the children's mental health needs were assessed and met. This was an area needing improvement in 33% of the treatment cases. In those cases, children were exposed to domestic violence but were not assessed by mental health.

### **Unfounded Investigations**

	Yes	No
Was the investigation initiated timely?	5	0
Was the assessment adequate?	4	1
Was the decision appropriate?	5	0

### **Explanation of Item 24: Unfounded Investigations**

This is an area of **Strength** for Allendale DSS. This item evaluates the agency's investigative process and determines if decisions were supported by the facts of the cases. All investigations were initiated timely. In one of the five cases reviewed, the assessment was not adequate because the investigator should have, but did not interview the alternate caregiver. The decision to unfound all five cases was supported by other pertinent documentation in the case file.

### Screened Out Intakes

	Yes	No	<b>Cannot Determine</b>
Was Intake Appropriately Screened Out?	5	0	0
	Yes	No	Not Applicable
Were Necessary Collaterals Contacted?	5	0	0
Were Appropriate Referrals Made?	5	0	0

#### **Explanation of Item 25: Screened Out Intakes**

This is an area of **Strength** for Allendale DSS. This item evaluates the process by which the agency screens out reports of incidents of abuse and/or neglect to determine if the intakes were appropriately screened out. All of the intakes were appropriately screened out. The reviewers found that Allendale DSS did a good job of documenting the justification for screening out reports and entering that information into the agency's database.

### Foster Home Licenses

#### **Explanation of Item 26: Foster Home Licenses**

This is an area of **Strength** for Allendale DSS. This item evaluates the process by which the agency ensures that all foster homes comply with licensing requirements. Agency data and the onsite review indicate that Allendale County foster homes are at a 100% compliance level with licensing requirements.

ALLENDALE COUNTY DSS SUMMARY SHEET							
		Performance Item Ratings					
	Performance Item or Outcome	Strength	Area Needing Improvement	N/A*			
Safety O	Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect.						
Item 1: Str	Timeliness of initiating investigations of reports of child maltreatment	10/10=100%	0	9			
Item 2: <b>Str</b>	Repeat maltreatment	18/19=95%	1/19=10%	0			
Safety Ou	tcome 2: Children are safely maintained in their homes wh	enever possible and	d appropriate.				
Item 3: <b>Str</b>	Services to family to protect child(ren) in home and prevent removal	13/13=100%	0	6			
Item 4: <b>Str</b>	Risk of harm to child(ren)	19/19=100%	0	0			
Permaner	ncy Outcome 1: Children have permanency and stability in	their living situation	ons.				
Item 5: Str	Foster care re-entries	1/1=100%	0	8			
Item 6: Str*	Stability of foster care placement	7/9=78%	2/9=22%	0			
Item 7: Str	Permanency goal for child	9/9=100%	0	0			
Item 8: Str	Reunification, guardianship, or permanent placement with relatives	1/1 = 100%	0	8			
Item 9: Str	Adoption	5/5=100%	0	4			
Item 10: ANI	Permanency goal of Alternate Planned Permanent Living Arrangement (APPLA)	2/3=67%	1/3=33%	6			
Perma	anency Outcome 2: The continuity of family relationships a		preserved for children.				
Item 11: <b>Str*</b>	Proximity of foster care placement	9/9= 100%	0	0			
Item 12: <b>Str</b>	Placement with siblings	7/7=100%	0	2			
Item 13: <b>Str</b>	Visiting with parents and siblings in foster care	7/7=100%	0	2			
Item 14: ANI	Preserving connections	3/9=33%	6/9=66%	0			
Item 15: ANI	Relative placement	5/9= 56%	4/9=44%	0			
Item 16: Str	Relationship of child in care with parents	3/3=100%	0	6			
	Well Being Outcome 1: Families have enhanced capacity to	o provide for their	children's needs.				
Item 17: Str	Needs and services of child, parents, caregiver	19/19=100%	0	0			
Item 18: ANI	Child and family involvement in case planning	14/18=78%	4/18=22%	1			
Item 19: Str	Worker visits with child	19/19=100%	0	0			
Item 20: Str	Worker visits with parent(s)	12/12=100%	0	7			
	Well Being Outcome 2: Children receive appropriate service		ucational needs.				
Item 21: Str	Educational needs of the child	14/14=100%	0	5			
Well I	Well Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.						
Item 22: <b>Str</b>	Physical health of the child	19/19=100%	0	0			
Item 23: ANI	Mental health of the child	12/14=86	2/14=14%	5			

The objective is that 95% of cases be rated "Strength".

Str = Strength

ANI = Area Needing Improvement
\* = Rating based on agency data, not onsite review findings