



JUDICIAL COUNCIL OF CALIFORNIA

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MEMORANDUM

Date

December 13, 2018

Action Requested

For review and approval

To

Court Executives Advisory Committee

Deadline

February 1, 2019

From

Judicial Branch Statistical Information
System (JBSIS) Subcommittee, Jake Chatters,
Chair

Contact

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Subject

New requirements for amendment submission
and new best practices for data quality review

Executive Summary

The Court Executives Advisory Committee (CEAC) should consider adopting new requirements for courts to amend data submitted to the Judicial Branch Statistical Information System (JBSIS) and to include expanded best practices in the JBSIS manual regarding data quality controls.

These recommendations are made in response to a letter sent to CEAC by the Audit Subcommittee and are designed to enhance the quality and confidence in JBSIS data. If approved, these guidelines would be incorporated into the JBSIS 3.0 manual that is scheduled for release in Spring 2019 and may be updated and revised from time to time as needed.

Recommendation

The Court Executives Advisory Committee should adopt new requirements for courts to make amendments to JBSIS data submissions when data errors exceeding a specified threshold are found. Specifically, JBSIS requirements should be established to require courts to:

1. Submit JBSIS data amendments upon identification of an error in a data submission that exceeds a 2% threshold.
2. Resubmit all JBSIS reports annually for fiscal years including in the upcoming year's funding model calculations. Courts submitting via the JBSIS portal should be encouraged to resubmit their data, but not required.

In addition, CEAC should consider adopting a set of data quality best practices to provide guidance to courts for data quality review prior to submitting data to JBSIS. These recommendations are made in response to a letter sent to CEAC by the Audit Subcommittee and are designed to enhance the quality and confidence in JBSIS data. If adopted, CEAC should consider directing the Office of Court Research staff to incorporate this information into the JBSIS 3.0 manual that is scheduled for release in Spring 2019.

Background

California Rules of Court 10.400 (a) states the purpose of JBSIS is: "to provide accurate, consistent, and timely information for the judicial branch, the Legislature, and other state agencies that require information from the courts to fulfill their mandates."

On April 17, 2018, Judge David Rosenberg, Chair of the Advisory Committee on Audits and Financial Accountability, wrote to Kimberly Flener, Chair of the Court Executives Advisory Committee, asking for the assistance of CEAC's JBSIS Subcommittee to consider various recommended enhancements to the JBSIS rules concerning data quality.

These recommendations were consistent with concurrent discussions of the JBSIS Subcommittee of CEAC concerning data submissions. The subcommittee discussed the topic at its August, October, and December 2018 meetings and have incorporated those discussions into the policy recommendations described here.

In addition, with the development of new JBSIS 3.0 filings definitions approved by the Judicial Council in January 2018, a new JBSIS manual is being developed to incorporate the new filings definitions; the addition of these data quality requirements and best practices in data reporting to the JBSIS manual are intended to further enhance JBSIS data quality.

Context for recommendation

The JBSIS subcommittee has focused its discussions related to policy-making on improving the accuracy, consistency, and timeliness of JBSIS data. The subcommittee met at various times in the last year to discuss principles of data quality and the standards by which courts must report JBSIS data. Through these discussions, the subcommittee, working within the framework provided by Rule 10.400, determines that JBSIS data submissions should meet the following criteria:

- **Accurate:** All data must accurately reflect actual events and should be reported in an agreed-upon format which conforms to JBSIS standards. Data should be captured in full. All mandatory data items within a data set should be completed and miscellaneous free-form codes will only be used where appropriate.
- **Consistent:** The data should be reported uniformly by courts using the JBSIS data definitions and reporting requirements specified in the JBSIS manual. JBSIS data definitions should be reflected in court procedure documents.
- **Timely:** Data should be collected and reported at the earliest opportunity.

Best Practices for Data Quality

The subcommittee also discussed practices that courts could engage in to improve data quality and integrity, including the following:

Define key roles in ensuring quality data integrity. While court leadership has ultimate responsibility for JBSIS data submissions, there are many individuals at a court that have a hand in ensuring JBSIS data quality (some individuals in a court may have more than one role).

Data Entry Staff are responsible for ensuring that the data collected is accurate, is as close to real-time as possible, and consistent with case management system entries.

Operations Managers, Supervisors, and Leads must ensure staff are aware of their responsibilities towards data quality. They must be certain to review data capture processes regularly, must ensure data entry staff are consistent in their approach to the quality of captured data, and must give feedback to data entry staff when discrepancies in data are identified.

Analytical Staff should ensure that data quality is monitored using audit and other operational reports and where anomalies are identified, that they are reported to court leaderships and raised with data entry staff and IT support for correction. They communicate with operations staff to ensure that data capture processes are reviewed regularly, clarify data definitions and reporting guidelines with Judicial Council staff, and communicate findings of quality review findings to court leadership.

IT Support is responsible for working with operations staff to ensure that the system configurations are accurate and collaborating with the analytical staff to implement technical solutions as needed.

Court Leadership are responsible for timely, accurate, and valid submission of JBSIS data. They must support and encourage a data quality culture amongst their teams and oversee the court's responsibility to resolve quality review findings.

Have methods of routine and non-routine review. Courts should run regular case management reports to check for data quality. Some examples of those reports could include:

- comparisons to prior periods (month to month or year to date to prior years); and
- review of exception reports that may identify data errors; and
- random sampling by pulling files to compare information in the paper file to what is entered in the case management system

Ensure CMS correctly maps to JBSIS definitions. As case management systems are upgraded or changed or as JBSIS definitions are revised to reflect changes in laws, the mappings should be reviewed to make sure the data are reported in the right JBSIS categories.

Ensure the court is reporting data based on the JBSIS definitions and not based on court practice. JBSIS definitions may not always match a court's particular way of processing cases. For example, some courts process Misdemeanor Driving Under the Influence cases in the traffic division whereas others process these matters as non-traffic misdemeanors. Regardless of where they are handled, these matters should be reported to JBSIS as traffic misdemeanors.

Train staff on the importance of JBSIS and data quality. JBSIS filings data are used in the budget allocation process and are audited as part of regular court audits; it is important that JBSIS data are accurate and that all court staff take responsibility for reporting JBSIS data correctly.

Include key data entry steps in procedures and other documents. Having all staff trained to report JBSIS data helps ensure better data quality.

To help achieve these standards, courts should consider adopting a data quality plan that would incorporate the above recommended practices. Further, these recommended practices will be incorporated in the JBSIS manual as best practices and updated and revised from time to time as needed.

Error Correction and Ensuring Data is Up to Date

To ensure data quality, clearer standards need to be established to require courts to address JBSIS data errors that result from any one of the following:

- a. Documented errors in an audit report;
- b. When the results of the annual data quality review by the Office of Court Research show that variation in data are the result of an error and not normal year-to-year differences;
- c. Findings and results of local quality assurance efforts as described elsewhere in these guidelines; or
- d. Ad hoc error discovery.

Error Quantification and Acceptable Error Rates

The error rate is determined by the difference of the reported value and the correct value, divided by the reported value. The magnitude of the error relative to the number of filings in a given period affected determines how courts should remedy the error. The JBSIS subcommittee determined that a 2% error rate met the criteria of being rigorous enough to ensure high data quality without posing an undue burden for courts.

The committee determined that an error rate of 2% or more in any one data element for a specific case type or cumulative across case types for one data element—limited at this time to filings, dispositions, trials, and time to disposition, when reported—should be established as the threshold above which courts must submit amended data correcting the report and that amended reports to resolve the error must be submitted within 60 days of error discovery.

If the cumulative error rate is below 2%, the size of the error is deemed ‘tolerable’—small enough that it becomes optional for courts to submit amended reports. However, courts must still remedy the underlying problem that results in the error and pay close attention to future errors in these data elements as any small future error may result in a cumulative error of 2% or more (for example, a court identifies an error of 1.5% and does not amend its reports. Later a new error of 1% is found. The cumulative error is now 2.5% and would trigger the requirement to amend data.)

Error rates for other JBSIS data elements will be considered in future versions of these guidelines.

Error diagnosis and prevention

The court's obligation to provide accurate data goes beyond remedying the erroneous report: the court should take affirmative steps to diagnose the source of the error and to prevent making it in the future. Errors should be studied to determine the root cause and remedied in the following manner:

1. Intermittent user errors should result in a training plan for court staff that addresses the errors.
2. Any intolerable error (greater than 2%) with a root cause in written policies, procedures, guidelines, desk manuals, etc., should result in appropriate changes to those documents.
3. Any intolerable error with a root cause in technology **must** result in a plan to address the error.

Error amendment

Courts must amend intolerable errors within 60 days of identifying the error or prior to the reporting deadline at which the affected fiscal year's data become part of the dataset to be included in the Resource Assessment Study (RAS) model (a date determined each year by the

Office of Court Research), whichever is sooner. If the root cause analysis indicates that the source of the error is not unique to the most recent fiscal year, amendments must be made to all three fiscal years that pertain to the upcoming RAS model calculations.

In addition, courts that report their data via JBSIS interface must annually resubmit all JBSIS reports that will become part of the dataset to be included in the Resource Assessment Study (RAS) model by the reporting deadline established each year by the Office of Court Research. Portal courts are encouraged to resubmit this data, but the Subcommittee does not recommend this as a requirement due to the significant staff effort involved in Portal resubmissions. Instead, Portal courts must pay extra attention to the 2% intolerable error reporting requirements.

In the event that intolerable errors are found, courts should notify the Office of Court Research as soon as practical. Courts should also provide documentation of resolution of intolerable errors and submit the amended reports within 60 days and can seek assistance from OCR in submitting amended reports. If tolerable errors are found, courts should notify the Office of Court Research if they intend to submit amended reports.

Conclusion

If approved by CEAC, these data amendment requirements will be incorporated into the JBSIS Manual as follows:

- a. Upon identification of an error or 2% or more in any one data element for a specific case type or cumulative across case types for one data element, courts must submit amendment within 60 days.
- b. Courts reporting their data via JBSIS will be required to resubmit their data for all reports annually on a date communicated by OCR for use in RAS and the annual Court Statistics Report.

Furthermore, if approved, JBSIS recommended data quality standards will be added to the JBSIS manual for reference.