

# Child Welfare Policy Manual

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## Questions & Answers

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### 3.2B INDEPENDENT LIVING, Data Collection, Outcome Measures

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**1. Question: Regarding the data element required in 45 CFR 1356.83(g)(6), does the race category of American Indian or Alaska Native include youth who have an attachment or affiliation with a non-Federally recognized Tribe?**

**Answer:** The race category does include youth who identify with an American Indian or Alaska Native Tribe regardless of whether that Tribe is recognized by the Federal government. This race category is per the Office of Management and Budget's Provisional Guidance on the Implementation of the 1997 Standards for Federal Data on Race and Ethnicity, at [https://www.ofm.wa.gov/sites/default/files/public/dataresearch/pop/asr/re\\_guidance2000update.pdf](https://www.ofm.wa.gov/sites/default/files/public/dataresearch/pop/asr/re_guidance2000update.pdf)

(See 73 FR 10345).

- **Source/Date:** 73 FR 10345 (February 26, 2008); (01/26/10)
- **Legal and Related References:** Social Security Act § section 477(f); 45 CFR 1356.83(g)(6)

**2. Question: What is the difference between § educational financial assistance§ as required in 45 CFR 1356.83(g)(32) and § educational aid§ as referenced in 45 CFR 1356.83(g)(41)?**

**Answer:** ?Educational financial assistance? is a service element that refers to financial supports that the State agency pays for or provides for the youth; ?educational aid? is an outcome element and refers to monies or other types of educational financial aid, from any source, that helps cover the youth?s educational expenses as an indicator of their financial self-sufficiency. The intention is to obtain data on both concepts (See 73 FR 10349-10350).

- **Source/Date:** 73 FR 10349-50 (February 26, 2008); (01/26/10)
- **Legal and Related References:** Social Security Act § section 477(f); 45 CFR 1356.83(g)(32) and (41)

**3. Question: Is the State permitted to conduct data cross-matching with other administrative databases to gather data on youth, such as those maintained by States to support corrections, Temporary Assistance for Needy Families, Medicaid, employment, education, and child support?**

**Answer:** For outcomes data collection, ACF is requiring that the States use the survey method prescribed in 45 CFR 1356.82(a)(2). The State must administer the outcomes survey in Appendix B of 45 CFR Part 1356 to youth directly. Therefore, the State may not provide information in the data elements described in paragraphs 45 CFR 1356.83(g)(37) ? (g)(58) from any other source. On the other hand, information on the youth's characteristics (e.g., adjudicated delinquent, educational level, or foster care status) does not need to be collected from the youth directly and may come from a source of administrative data.

- **Source/Date:** 73 FR 10350 (February 26, 2008); (01/26/10)
- **Legal and Related References:** Social Security Act § section 477(f); 45 CFR 1356.82(a)(2), 45 CFR 1356.83(g)(34) § (58)

**4. Question: Regarding the data required in 45 CFR 1356.83(g)(40), should a State report a youth who receives Supplemental Security Income/Social Security Disability Insurance (SSI/SSDI) payments which are applied to the cost of foster care or only those that are paid to the youth directly? What if a youth does not know he/she was an SSI/SSDI recipient if such payments were applied to the cost of foster care? Should a State § correct § a youth's response accordingly?**

**Answer:** If the youth is a SSI/SSDI beneficiary but his or her payment is going towards the cost of foster care, then the youth is receiving social security payments consistent with the description for the data element in 45 CFR 1356.83(g)(40). However, the State is not to correct a youth's response if the youth is a beneficiary but responds in the negative to the social security survey question. Although this may result in some cases of a youth answering the question incorrectly, it is important to the integrity of the survey and data to represent the youth's understanding of his or her own circumstances.

- **Source/Date:** 73 FR 10351-52 (February 26, 2008); (01/26/10)
- **Legal and Related References:** Social Security Act § section 477(f)(1); 45 CFR 1356.83(g)(40)

**5. Question: Please explain the calculation of the participation rate, as required in 45 CFR 1356.85(b)(3), to exclude youth who are deceased or institutionalized.**

**Answer:** The regulation at 45 CFR 1356.85(b)(3) excludes youth who are reported by the State as deceased, incapacitated or incarcerated in the follow-up population in our calculation of the participation rate. Excluding individuals who should not participate due to the nature of the survey from the calculation of response rates is a standard practice. ACF will use the data States report in the outcomes reporting status element described in 45 CFR 1356.83(g)(34) in calculating the participation rate. For example, for a State that does not sample there are 215 17-year-old youth in the baseline population who participate in the outcomes survey. Two years later, none of the 215 youth are in foster care and five of these youth become incapacitated, incarcerated or deceased. In another two years, 10 more of the

original baseline youth become incapacitated, incarcerated or deceased. ACF will calculate whether the State has reported some outcomes information on 60% of the remaining 200 youth in the follow-up population at age 21 to determine whether the State has met its participation rate.

However, please note that even though outcomes information for incapacitated, incarcerated and deceased youth will be unavailable for the report period, a State must still report all other information for such youth. For example a State may not report outcome data for an incarcerated youth during a report period, but must report service information if she received independent living services that were paid for or provided by the State agency at some point in the report period.

- **Source/Date:** 73 FR 10357 (February 26, 2008); (01/26/10)
- **Legal and Related References:** Social Security Act § section 477(f); 45 CFR1356.83(g)(34) and 45 CFR 1356.85(b)(3)