



## Wisconsin

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# NYTD Review Final Report

Onsite review conducted: August 21 – 25, 2023

Report issued: March 8, 2024



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**



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# 1. Introduction

## 1.1 Background

The John H. Chafee Foster Care Program for Successful Transitions to Adulthood (the Chafee Program), in section 477 of the Social Security Act, provides states with flexible funding to carry out programs that assist youth in transitioning from foster care to self-sufficiency.<sup>1</sup> This law required the Administration for Children and Families (ACF) to develop a data collection system to track Independent Living (IL) services states provide to youth and develop outcome measures to assess states' performance in operating IL programs. ACF implemented the National Youth in Transition Database (NYTD) by [regulation](#) in 2008. Consistent with the regulation, states engage in two data collection activities for NYTD. First, states collect information on youth and the IL services they receive that are paid for or provided by the state agency that administers the Chafee Program. Second, states collect outcomes information on youth in foster care at age 17, whom the state will follow over time to collect additional outcome information at ages 19 and 21. The collected information allows ACF to track which IL services states provide and assess the collective outcomes of youth. NYTD also provides a new source of data to assist in determining the effectiveness of IL programs nationwide. States must use a common identifier for youth reported to both NYTD and the [Adoption and Foster Care Analysis and Reporting System \(AFCARS\)](#); this enables ACF to analyze the information related to a youth's foster care experiences reported to AFCARS along with their services and/or outcome information reported to NYTD.

## 1.2 Overview of the NYTD Review

To ensure that data are available for the purposes outlined above, it is important to periodically assess the accuracy of the child welfare data submitted by states. The Children's Bureau's primary way to monitor NYTD data quality is through a semiannual review of state NYTD data files. The NYTD regulation lists compliance standards to assess whether state data meets minimal standards for timeliness and quality (45 CFR 1356.85). The Children's Bureau specified in the regulation at 45 CFR 1356.85(d)(2) that the agency may use other monitoring tools or assessment procedures to determine whether a state meets all NYTD requirements.

The purpose of the NYTD Review is to comprehensively evaluate the Chafee agency's policies and practices for collecting and reporting timely, reliable, and accurate data on youth in transition. To do so, the state's NYTD data collection processes are assessed against the NYTD requirements in the [federal regulation](#), policy issuances, and the [NYTD technical bulletins](#) by:

- Validating and verifying that the state's child welfare information system can collect, manage, and report required data on youth in transition, including confirming that states operating a Comprehensive Child Welfare Information System (CCWIS) that receive federal financial participation (FFP) are collecting and managing NYTD data consistent with federal requirements.

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<sup>1</sup> Public Law 106–169 established the John H. Chafee Foster Care Independence Program (CFCIP). Public Law 115–123, enacted on February 9, 2018, renamed the John H. Chafee Foster Care Program for Successful Transitions to Adulthood.

- Evaluating the state’s survey methodology, including validating the instruments used to collect outcomes data and reviewing the state’s approach to locating and engaging youth in the survey; and
- Assessing the timeliness, accuracy, reliability, and completeness of data.

The NYTD Review has three phases: (1) pre-onsite, (2) onsite, and (3) post-onsite, which are outlined in Figure 1. During the **pre-onsite phase**, the state and federal team conducts a series of planning calls to establish the submission of information, timeline, logistics, and preliminary information on ratings. During this time, the state prepares and submits documentation describing its implementation of NYTD requirements. The **onsite phase** includes demonstrations of key aspects of the state’s data collection system and a review of a sample of case records. During the review, the federal team also conducts interviews with community partners, youth, caseworkers, and service providers. Through this process, we learn more about the state’s capacity to collect accurate data consistent with the definitions of the data elements specified in the NYTD regulation and to document the state’s readiness to use NYTD data for program management and evaluation. Following the onsite review, the Children’s Bureau prepares a report documenting our findings and lists suggested resources and supports. If the Children’s Bureau identifies technical assistance needs during the onsite review, the report explains the actions the state should take to improve the quality and accuracy of data collection for NYTD as part of the **post-onsite phase**.

Pre-onsite phase	Onsite phase	Post-onsite phase
<ul style="list-style-type: none"> <li>• Planning conference calls</li> <li>• System and survey documentation</li> <li>• Test cases</li> <li>• Case record review sample</li> <li>• Requirements Workbook</li> </ul>	<ul style="list-style-type: none"> <li>• Entrance and exit conference</li> <li>• System demonstration</li> <li>• Case record review</li> <li>• Community partners interviews</li> <li>• CQI discussion</li> </ul>	<ul style="list-style-type: none"> <li>• Debrief conference call</li> <li>• Final report</li> <li>• Improvement plan</li> </ul>
<p>Duration:</p> <p>+20 weeks</p>	<p>Duration:</p> <p>5 days</p>	<p>Duration:</p> <p>16 weeks, plus additional time to complete the improvement plan (typically 3 years)</p>

Figure 1. Overview of the NYTD Review Phases

### 1.3 Requirements Subject to Review and Rating Factors

There are two major areas assessed during the review: the general requirements for NYTD data collection and reporting and the 58 NYTD data elements. Figure 2 lists the general requirements, which include the populations to be reported to NYTD, the technical requirements for constructing a data file, and data quality.

1. The state reports information on all youth in the served population.
2. The state reports information on all youth in the baseline population.
3. The state reports information on all youth in the follow-up population.
4. The state implements an appropriate survey methodology to collect youth outcomes data.
5. The state follows ACF's sampling procedures (applicable to states opting to sample only).
6. The state reports NYTD data files following ACF's specification.
7. The state conducts quality assurance to ensure NYTD information can be analyzed and used.

Figure 2. General Requirements

During the NYTD Review, the seven general requirements and the 58 data elements are assessed against the requirements in the regulation and other policy and technical issuances. The state's NYTD data also are evaluated for quality. For the data to be considered quality, it must be timely, accurate, complete, and reliable. Findings and observations from each review component are analyzed to determine a rating factor for each general requirement and each data element.

Table 1 lists the rating factors used to evaluate NYTD requirements and data elements. A state must improve each requirement/element identified in the final report that did not receive a "4" rating (i.e., the state does not fully meet the requirement). These improvements may involve changing the information system, extraction routine, and/or data entry to satisfy the requirement fully. In other cases, the Children's Bureau may recommend improved training or clarifying guidance or documentation. A state will not receive a "4" rating factor (i.e., the state fully meets the NYTD requirement) until all system and data quality issues have been addressed in the improvement plan. While there is no expectation that data are 100% accurate for every element, there is an expectation that the state will submit data of a significant level of completeness and without inconsistency errors and that the state will maintain data quality over several report periods.

Table 1. NYTD Review Rating Factors

Rating Factor	Definition For General Requirements	Definition For Data Elements
4	<p>The <b>requirement has been met</b>, and the state has developed and implemented policies/practices that support the collection and reporting of <b>high-quality data</b> to the NYTD system. For example:</p> <ul style="list-style-type: none"> <li>• The state has collected accurate, timely, and complete information on required reporting populations.</li> <li>• The state has implemented a survey methodology using a valid survey instrument and has achieved a high survey participation rate.</li> </ul>	<p>The <b>requirement has been met</b>, and the state has sustained a <b>high level of quality data</b> for the element. For example:</p> <ul style="list-style-type: none"> <li>• The state's methodology for collecting, extracting, and reporting information for an element is consistent with NYTD requirements.</li> <li>• The state has a process to keep data elements up-to-date, even for a youth who exits foster care.</li> <li>• The state has reported consistently high-quality data for the element over time.</li> </ul>

Rating Factor	Definition For General Requirements	Definition For Data Elements
	<ul style="list-style-type: none"> <li>The state has followed all technical guidance in conducting sampling and reporting the NYTD file.</li> <li>There are quality assurance processes in place to ensure all NYTD data are accurately entered into the system and to identify and resolve data quality issues.</li> </ul>	
3	<p>There are practice or design issues affecting <b>data quality</b>. For example:</p> <ul style="list-style-type: none"> <li>There is inadequate training for workers to understand how to collect NYTD data.</li> <li>The state has reported missing or logically inconsistent responses from youth on the NYTD survey.</li> <li>There are inadequate supervisory controls for ensuring timely and accurate data entry.</li> </ul>	<p>There are <b>data quality</b> issues identified for a data element. For example:</p> <ul style="list-style-type: none"> <li>There are data errors or data quality advisories flagged for the element in NYTD reports.</li> <li>Information for the element is not consistently entered by workers.</li> <li>There are incorrect or ambiguous instructions, definitions, data entry screens, or forms for the element.</li> </ul>
2	<p>There are <b>technical problems</b> prohibiting the system from meeting the requirement. For example:</p> <ul style="list-style-type: none"> <li>The system requires modification to collect accurate, timely, and complete information on required reporting populations.</li> <li>The state’s survey instrument contains incorrect questions, response options or contains misleading information that hinders a youth’s participation in the survey.</li> </ul>	<p>There are <b>technical problems</b> prohibiting the system from collecting information consistent with NYTD requirements. For example:</p> <ul style="list-style-type: none"> <li>The state’s data collection method and/or information system has the capability to collect the data, but the program logic used to construct the NYTD file has errors.</li> <li>The state uses default values for blank information for the element.</li> <li>Information for the element is coming from the wrong module or field in the system.</li> <li>The system needs modification to encompass all conditions or possible values to collect information on the element.</li> <li>The extraction code for the NYTD report selects and reports incorrect information for the element.</li> </ul>
1	<p>The requirement <b>has not been implemented</b>. For example:</p> <ul style="list-style-type: none"> <li>The state is not collecting and reporting information on a required reporting population.</li> </ul>	<p>The <b>data element is not collected or reported</b> in the system. For example:</p> <ul style="list-style-type: none"> <li>The state’s data collection method and/or information system does not have the capability to collect the correct</li> </ul>

Rating Factor	Definition For General Requirements	Definition For Data Elements
	<ul style="list-style-type: none"> <li>The state does not conduct quality assurance on NYTD data.</li> </ul>	information for the element (i.e., there is no data field on the screens or form). <ul style="list-style-type: none"> <li>There is no program logic to extract information on the element.</li> </ul>
0	State operating a SACWIS or CCWIS for which it received federal financial participation (FFP) was found not to be collecting or managing NYTD data in its system consistent with federal requirements.	State operating a SACWIS or CCWIS for which it received federal financial participation (FFP) was found not to be collecting or managing NYTD data in its system consistent with federal requirements.

## 2. NYTD in Wisconsin

Wisconsin's child welfare system is county-administered, except for Milwaukee County, which is run by the state. Wisconsin is home to 11 federally recognized tribes<sup>2</sup>. As of fiscal year (FY) 2023, five tribes receive Independent Living funding: Bad River, Ho Chunk, Lac Courte Oreilles, Menominee, and Red Cliff. The National Youth in Transition Database (NYTD) is administered by the Wisconsin Department of Children and Families (DCF). The key agencies that assist in the NYTD process in Wisconsin include:

- DCF- Disability Support Program (DSP),
- DCF- Bureau of Information Technology Services (BITS),
- DCF- Operations,
- CGI as a contractor for the state system, eWISACWIS,
- University of Wisconsin Survey Center (UWSC) for survey administration, and
- Transition Resources Agencies (TRAs) are community-based organizations providing services to young people transitioning from foster care.

Wisconsin has also established the Bureau of Regional Operations (BRO), which is part of the Division of Management Services and is responsible for assisting the child welfare program through quality assurance, regional technical assistance, training to counties, communication, and collaboration with the eleven federal recognized tribes in Wisconsin. The BRO also connects child welfare to other areas of DCF programming, including childcare, employment services, child support, and refugee services.

DCF has sponsored a statewide Youth Advisory Council (YAC) since 2005, and all regions within the state are required to facilitate a regional YAC. The YACs' shared mission is "to inspire positive change by providing education, advocacy, support, training, and awareness to governmental systems and the general public to help them better understand the foster care system. To ensure that those with lived

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<sup>2</sup> Wisconsin's 11 federally recognized tribes: Bad River Band of Lake Superior Chippewa, Ho-Chunk Nation, Lac Courte Oreilles Band of Lake Superior Chippewa, Lac du Flambeau Band of Lake Superior Chippewa, Menominee Tribe of Wisconsin, Oneida Nation, Forest County Potawatomi, Red Cliff Band of Lake Superior Chippewa, St. Croix Chippewa, Sokaogon Chippewa (Mole Lake), and Stockbridge-Munsee.



experience have a seat at the table when community partners are making programming and policy decisions that impact all youth involved in the foster care system in Wisconsin.”

### 3. NYTD Review

#### 3.1 Overview of the Pre-onsite Phase

Wisconsin received the confirmation letter from the Children’s Bureau notifying the state NYTD Review on November 1, 2022. The confirmation letter provided information to the state about the purpose of the NYTD Review and information on what the state would need to do to prepare for the review. The kick-off planning for the NYTD Review was held on April 3, 2023, to go over the NYTD review process and introduce key members of the federal and state teams. Following the kick-off meeting, the Children’s Bureau scheduled (1) monthly calls with the state to go over the planning and logistics of the review, (2) weekly technical calls to review the technical specifications of the state system, eWiSACWIS, beginning July 11, 2023, and (3) youth engagement planning calls as needed by the state.

During the pre-onsite review phase, Wisconsin provided extensive documentation to assist the federal team in understanding the state’s independent living program. The state provided material that described the state’s approach to needs assessment, transition planning, and service delivery to young people, system documentation, and survey documentation. The federal team also reviewed a variety of other publicly available documents, such as the Child and Family Services Plan (CFSP) and the Annual Progress and Services Report (APSR) and reports from any other Children’s Bureau monitoring effort (e.g., AFCARS Assessment Review, Child and Family Services Review, etc.).

As part of the pre-onsite phase, the federal team provides the state with six mock case records containing information about youth in a typical NYTD data file submission, such as youth receiving independent living services or a youth eligible to participate in the NYTD survey. The test cases are intended to validate the state’s information system for accuracy and to test the state’s understanding of the NYTD requirements. The Children’s Bureau provided test case scenarios to the state on June 14, 2022. The state was able to enter, extract, and report three of the six-test data from eWiSACWIS on August 17, 2022.

#### 3.2 Overview of the Onsite Phase

On August 21 – 25, 2023, the Children’s Bureau conducted the onsite NYTD Review visit in collaboration with Wisconsin’s National Youth in Transition Database (NYTD) implementation team in the Department of Children and Families and the state partners. The federal team consisted of representatives from the Children’s Bureau Central Office, Region 5 Office, staff from the Children’s Bureau’s NYTD Help Desk, and young adult NYTD Reviewers who are consultants from JBS International, Inc.

The onsite review began with a demonstration of the state’s child welfare information eWiSACWIS. The system demonstration included demographic data collection practices and independent living services collection practices. A discussion with the University of Wisconsin Survey Center followed the system demonstration on how the NYTD survey was administered in the state. On the second day of the review, the federal team completed the case record review using a 30-case sample of records reported in the 2023A File (October 1, 2022, to March 31, 2023) for youth in the served and baseline populations and

2022B (April 1, 2022, to September 30, 2022) for youth in the follow-up population. On the third day of the review, the federal team discussed continuous quality improvement (CQI) and file reporting with the state. Lastly, the federal team interviewed over 30 individuals, including case managers, independent living service providers, judicial partners, foster parents, and other child welfare officials. In addition, the state organized three focus groups with youth in foster care and youth formerly in foster care. The Children's Bureau delivered preliminary findings to the state during the exit conference.

## 4. Findings

### 4.1 Overview of Findings

To determine the state's ratings, CB reviewed the state's documents, data, case file review findings, and onsite notes to make the final determination. This section summarizes the significant reporting and data quality issues identified in this comprehensive assessment. Table 2 provides a high-level overview of the data quality and technical issues the state needs to address. Where applicable, CB indicated the data element, test case number, or case review sample number relevant to each finding. For detailed information on specific issues for the general requirements and the data elements, please see Appendix C.

Table 2. Summary Ratings for General Requirements and Data Elements

Rating	Ratings of the 7 General Requirements	Ratings of the 58 Data Elements
4	0	11
3	1	3
2	5	44
1	0	0
0	0	0
Not applicable	1	0

### 4.2 Data Collection on Youth Demographics

#### **General Requirements 1, 2, and 4; Data Elements 4-19, and 36**

Youth demographics is part of three General Requirements: **General Requirement #1, information on all youth in the served population; General Requirement #2, information on all youth in the baseline population; and General Requirement #4, the state implements an appropriate survey methodology to collect youth outcomes data.** These General Requirements require the state to collect accurate information on youth demographics, including NYTD data **elements 4–19 and 36.** These data elements provide critical information on the basic characteristics of youth reported to NYTD. Many of these elements are reporting requirements for other purposes, including reports to AFCARS. Having reliable and accurate data on the characteristics of youth is an important component in assessing the adequacy and quality of services provided to meet the unique needs of young people.

The NYTD Review identified challenges in the state’s collection and management of information on youths’ race (**elements 6-11**), foster care status services (**element 14**), local agency (**element 15**), federally recognized tribe (**element 16**), highest educational level completed (**element 18**), and foster care status—outcomes (**element 36**). The following technical problems prohibit eWiSACWIS from fully meeting the requirements to collect information on the characteristics of youth in the served population:

Race and Ethnicity System Logic. Wisconsin needs to correct the system logic for the youth’s race and ethnicity elements. The system must be able to collect “unknown” (**element 11**) in conjunction with another race (**elements 6 -10**). **Element 6** and **element 16** (federally recognized tribe) are linked such that a value can only be entered for **element 16** if a youth is also reported to be American Indian or Alaska Native (“yes” for **element 6**). While not mutually exclusive, **elements 6** and **16** are different elements that must be reported separately.

Incorrectly reporting elements: **Element 15** must be reported based on the data in **element 14**. The state should report the FIPS code of the state/county that reflects the placement and care.

Defaulting data: **Element 18** defaults in eWiSACWIS to education level “11”. The state should not default to a particular education level in the system when no data has been entered.

Reporting errors: During the case record review, we determined that **elements 14** and **36** (both related to foster care status) are being reported incorrectly. **Element 36** should report foster care status on the day the young person takes (or is determined not to take) the survey. **Element 14** reports foster care status if they were in foster care on any day during the reporting period (entire six months). **Element 15** must be reported based on the data in **element 14**.

Tribal data reporting: The state does not report information on IL services or outcomes to the Children’s Bureau if the tribal IL program serves the young person. Whatever data the state does ‘collect’ is not entered into eWiSACWIS because of data sovereignty concerns<sup>3</sup>.

Additional data quality issues were found for sex (**element 4**), adjudicated delinquent (**element 17**), and special education (**element 19**). The data quality issues associated with these elements were identified during the case record review, where the Children’s Bureau found inconsistency in reporting these elements. These elements received a “3” due to a lack of documentation on how counties should consistently report these elements.

Wisconsin primarily uses Chafee dollars to support direct services through regional and/or tribal IL programs, with funding also used for youth engagement efforts and events and a small amount reserved for program administration. In Wisconsin, a young person may be eligible for IL support until age 21 (age 23 for the Brighter Star program that uses Education and Training Voucher grant funds). The Independent Living Transition to Discharge (ILTD) plan is at the core of each young person’s transition from care to adulthood. This plan, which is required for youth in care at 17.5 and likely to exit from care

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<sup>3</sup> The CB regional office learned during a IV-E review meeting with the state that if the tribe has placement and care of children/youth, the children/youth are not entered into eWiSACWIS.

at age 18 or older, builds upon the IL skills and supports they received while in care and looks ahead to their future needs and goals. In 2019, county, tribal, and transition resource agencies collectively provided more than 5,800 unique IL and ETV services to eligible young people.<sup>4</sup>

As a county-administered system, the state of Wisconsin has developed policies and procedures that direct the county caseworker to enter all services provided to the youth/ young adult, including those provided by the youth's placement or foster parent. The Transition Resource Agencies (TRA) are responsible for reporting the services provided for young adults no longer in foster care.

[Wisconsin's Indian Child Welfare Act](#) was established to protect the best interests of Indian children and to promote the stability and security of Indian tribes and families. The state has created a process whereby tribes can apply for Independent Living funding to support youth between the ages of 14-23 who are in and transitioning from out-of-home care in five key areas: health and wellbeing, employment, housing, permanent connections, and education. As of the fiscal year 2023, five tribes receive these funds: Bad River, Ho Chunk, Lac Courte Oreilles, Menominee, and Red Cliff. Tribal youth/ young adults may also be served by the county and/or TRAs.

Wisconsin tracks outcomes related to independent living in two primary ways: Transition Resource Agencies' (TRAs) biannual outcome reporting and National Youth in Transition Database (NYTD) survey results. All of the NYTD services are reported by using eWiSACWIS. When a young person becomes eligible for independent living services, the caseworker at the county level can "create" the IL Services module in eWiSACWIS. The IL module has several tabs that collect information on various activities related to independent living, including eligibility, referral to the TRAs, information related to goals, the transition plan, vital documents, and the NYTD survey.

During the NYTD Review, CB discovered the Independent Living Needs Assessment (**element 20**) does not have a date range to determine if the IL Needs Assessment was conducted during the reporting period. Therefore, the state is reporting to NYTD if an IL Needs Assessment was ever completed instead of during the period of review. The state should only report an independent living needs assessment conducted during the reporting period. We also learned that the worker could report a few NYTD services on the ILTD screen. On the ILTD screen, there are goals related to "housing" (**element 26- housing education and home management training**), "health" (**element 27- health education and risk prevention**), "education" (**element 22 post-secondary educational support, element 23- career preparation, and element 32 – education financial assistance**), "mentors and/or other supportive adults identified" (**element 29- mentoring**) "income," and employment services and workforce supports." Each category has a "Date to be Completed" to be entered. If the "Date to be Completed" is in the reporting period, eWiSACWIS will generate a service under one of those categories as a reported service. Because the field is reporting information based on an expected completion date, we cannot determine if a service was delivered.

Figure 3 compares Independent Living Services Provided in the federal fiscal year (FFY )21 and FFY 22 Wisconsin and United States. The Independent Living Needs Assessment (**element 20**) is being overreported to NYTD since the state is reporting an independent living needs assessment conducted

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<sup>4</sup> Wisconsin's Independent Living Program: 2016 – 2019 Summary Report. Fall 2020

outside of the federal reporting period. During the case record review, CB found instances of underreporting services; details of these findings are documented in Appendix B.

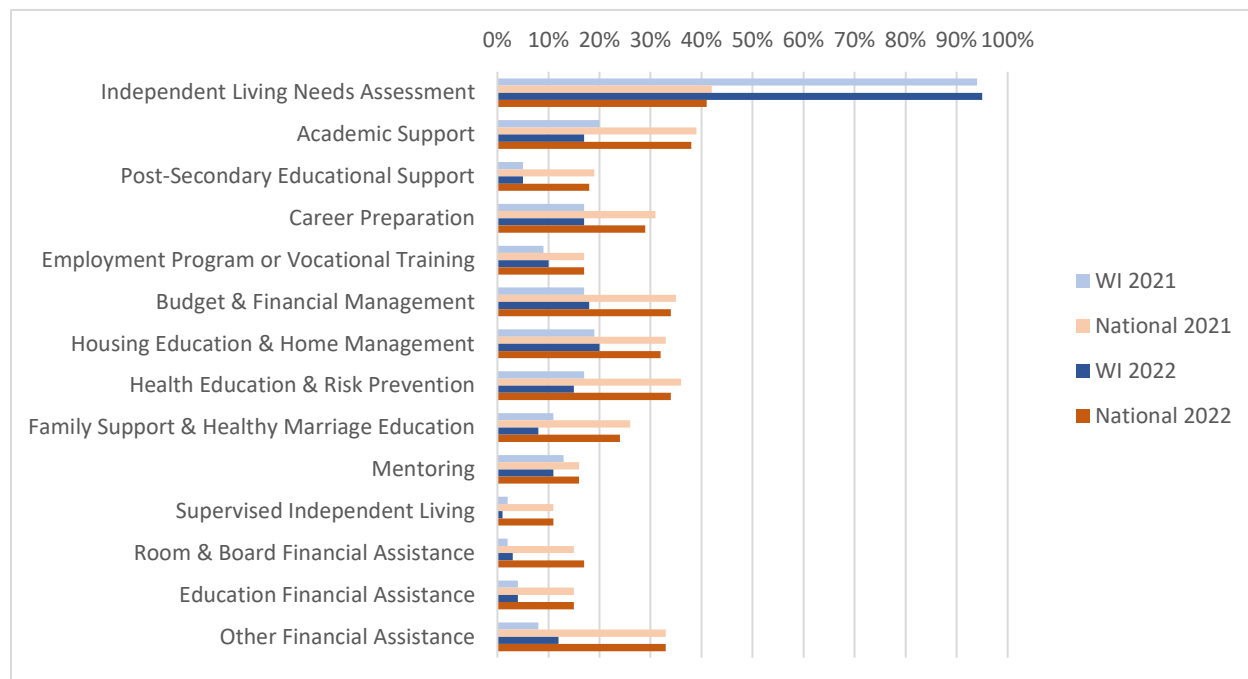


Figure 3. Independent Living Services Provided in FFY 21 and FFY 22 Wisconsin and United States

#### 4.2.1. Feedback From Community Partners Regarding the Independent Living Program

The purpose of the community partner interviews was to collect information that describes Wisconsin’s NYTD implementation and ongoing efforts from a variety of perspectives. The federal team interviewed professionals and supportive adults who provide services to youth transitioning out of foster care, actively work on NYTD data collection, and/or share a stake in promoting positive outcomes for young people. During the Wisconsin NYTD Review, the federal team conducted 20 interviews with community partners, including child welfare professionals, Tribal providers and liaisons, Transition Resource Agency (TRA) supervisors and coordinators, congregate care providers, court partners, and foster parents. The community partner interviews were centered around four items. The information obtained across the interviews is summarized for each item below.

**(1) Supporting and serving youth in transition.** Across the different interviews, there was a sincere desire to increase services to young people. Community partners noted some successful efforts to collaborate with community partners, local employers, Tribes, and county service providers to offer youth-driven and tailored services to young people. Notably, clear communication, strong relationships, and regular meetings between program staff, Tribal liaisons, and the state were cited as important mechanisms for collaboration when services were successful. Supportive programs and services were also identified; as well as notable efforts to assist young people with accessing vital documents.

In addition to the strengths identified, community partners consistently reported significant shortages in services, particularly housing and mental health services. Community partners reported several barriers to providing services, including limited funds, difficulties connecting with Tribal youth, limited transportation in rural areas, and a disconnect between the caseworkers, TRA IL Coordinators, and DCF. Some interview participants also noted a reliance on group homes and foster parents to support independent living (IL) skills. Overall, many community partners reported inconsistent availability of services across the state and a consistent theme of too few services, too late.

**(2) Collecting data on youth in transition.** Community partners expressed varying degrees of familiarity with NYTD. Some community partners were knowledgeable about the NYTD survey and were familiar with survey dissemination. The community partners stated that the report is shared across Tribes and with the state.

In addition to the strengths identified, there were several community partners who had not heard of NYTD and noted a shortage of NYTD-specific training. Across the different interviews, there was varying feedback on the accuracy and quality of data collected on young people. Community partners specifically noted that services provided to young people were likely underreported due to a lack of data entry and/or data entry challenges.

A key theme that emerged was a disjointed data collection system across Wisconsin. Several community partners noted using their own systems for case and service management. Participants noted limitations to eWiSACWIS, such as inflexible data entry options (e.g., service categories that do not fit the services provided to youth) and limited options to enter notes on services provided to young people. Despite reports of a disjointed data collection system across the interviews, it is notable that some community partners reported no barriers or challenges to using eWiSACWIS.

**(3) Analyzing and using data to advance policy and practice serving youth.** Community partners expressed a strong interest in using data to provide better support and services to young people. However, across many of the interviews, community partners consistently reported the lack of a feedback loop between counties, Tribes, and the state. Community partners also reported not knowing how the NYTD data informs practice or policy. Some community partners reported that they are not notified when a young person completes the NYTD survey and noted that it would be helpful to receive notifications when a young person completes the survey. Furthermore, when the state's data snapshot was shared during interviews, some of the community partners did not find the results surprising; however, several community partners reported that the data in the snapshots was in contrast with their knowledge or assumptions about NYTD. For example, community partners suspected there was underreporting of services and that the number of young people completing the NYTD survey and receiving services was higher than reported in the snapshots. Community partners reported that if there was more awareness of the data available, the data snapshots could be helpful for guiding discussions.

**(4) Engaging young people in program improvement efforts.** Overall, the community partners expressed a strong desire to engage young people to make improvements in the programs and systems that serve youth. Participants noted a number of available avenues for engagement, such as the Tribal

Youth Advisory Council (YAC), Local Youth Advisory Councils, a legislative day when young people meet with lawmakers to talk about their needs, a youth voices panel, Youth Action Council, and the Bureau of Youth Services. Across the different interviews, community partners reported strategies to locate, contact, and engage young people. For example, they were using social media platforms such as Facebook and TikTok to locate youth, as well as using a system linked to the Wisconsin Circuit Courts and searching the Consolidated Court Automation Program (CCAP) system to locate young people. One community partner mentioned working with the University of Wisconsin Survey Center to get young people's contact information. Others reported strategies for making the survey sound appealing over email (e.g., "You're the perfect person to participate in this survey"), as well as remembering to follow up about the survey during face-to-face meetings and remembering to ask young people about their preferred contact methods. In addition to the notable engagement efforts, it was reported that engagement has declined in recent years, particularly during the pandemic.

#### 4.2.2. Feedback From Youth Focus Group

The federal team conducted three focus groups with youth in foster care and young adults formerly in foster care. The young people were asked about IL services, the support received, and barriers to receiving services. The young people were also asked about their familiarity with the NYTD survey and outcomes. The Young People Focus Groups were centered around four items. The information obtained across the interviews is summarized for each item below.

**(1) Supporting and serving youth in transition.** Overall, the young people reported mixed experiences with receiving IL services. While some reported having a positive and beneficial experience with receiving IL services, others noted gaps in services for counseling/mental health, older youth (18 yr. plus), rural areas, and housing. When asked about who connected them to services, some young people reported positive and supportive relationships with IL coordinators, TRAs, social workers, and regional YAC. However, others mentioned inconsistent mentorship/support from their IL coordinators and disappointment with the YAC. Young people specifically noted disparate availability of services based on location and needing more support navigating public assistance programs.

**(2) Collecting data on youth in transition.** When asked about their familiarity with NYTD, a majority reported that they remember taking the NYTD survey, but there were mixed responses about whether or not they received the incentive. At least one focus group participant recalled receiving the incentive and being happy with the amount. Of note, one participant reported that some of the survey questions were emotionally activating. The federal team noted this as an opportunity to add a checkbox to the NYTD survey for young people to indicate the need for follow-up support.

**(3) Analyzing and using data to advance policy and practice serving youth.** The young people were asked about how they would like the state to communicate about NYTD data. In the future, the young people mentioned wanting to learn more about the survey and outcomes via text message, email, and/or direct communication from case workers. When the young people were asked about the youth services outcomes reported by the state, young people spoke about their interest in seeing the results from the NYTD survey to understand better how others responded to the same questions. When discussing the Wisconsin NYTD Data Snapshot, there was mixed familiarity with the snapshot.

**(4) Engaging young people in program improvement efforts.** Young people reported being a part of the local and state YACs. Although young people reported being disappointed with the state YAC, others in the focus group reported positive experiences interacting with YAC as the main source of information. One of the focus group participants expressed an interest in contributing to data visualizations to make the data more young-people friendly. Another focus group participant remembered a case worker reaching out for input in developing pamphlets for the court and other projects.

### 4.3 Data Collection on Youth Outcomes

#### **General Requirements 2-4; Elements 34, 35, and 7-58**

States are required to collect outcomes information using the survey questions listed in Appendix B of the NYTD regulation on a *baseline population* of youth in foster care at age 17 and a *follow-up population* cohort of 19- and 21-year-old youth. While the NYTD survey questions are listed in the NYTD regulation, states are responsible for crafting a survey instrument and selecting a survey method. The NYTD Review documents and assesses the state's efforts to administer the NYTD survey appropriately, from invitation to survey completion, to ensure that outcomes data are collected accurately and that the state's outcomes data collection methods reflect best practices in survey administration and youth engagement. During the onsite review, we discussed Wisconsin's process for administering the baseline and follow-up surveys, including the state's efforts to locate and engage youth in this outcomes data collection effort.

#### 4.3.1. General Information on the State's Survey Effort

Wisconsin contracts out the NYTD survey efforts to the University of Wisconsin Survey Center (UWSC). UWSC primarily administers the survey through an online portal, where the young person receives a web link to access the survey. Paper surveys are sent to incarcerated youth or by request at ages 19 or 21. If the young person does not have internet access, they can also take the survey via the UWSC phone hotline. Wisconsin provides a Spanish translation of the NYTD survey. Additionally, Wisconsin asks its young people additional questions outside of what is required in the legislation to understand better how to serve their young people.

The survey protocol is the same for 17-, 19-, and 21-year-olds who participate in the survey. An initial \$5 (cash) is sent in an advance letter to inform the young person about the survey. To remind the young person to take the survey, USWS does various follow-ups, including emails, reminder letters, phone calls, and different intervals. Once the young person completes the survey, the young person will receive a thank you note from UWSC and \$20 in cash. UWSC typically mails the incentive to the young person within two weeks of survey completion.

Overall, the state of Wisconsin has a very strong survey practice; however, the state received a "2" on all the rating elements related to the survey due to Wisconsin not allowing the youth to actively decline to answer a survey question (a youth can decline to answer a question, but it is not a response option). Appendix C details additional reporting errors regarding the data **elements 37-58** related to the survey.



#### 4.3.2. Data Collection on Youth Outcomes at 17 years old

To administer the survey, UWSC downloads monthly and daily reports from the eWiSACWIS to determine eligibility for the 17-year-olds. In eWiSACWIS, the system identifies members who are eligible for the baseline by looking at their date of birth and foster care status. That information is populated into the report (Y17). The information from the state is populated into the Project Operation Database, which creates emails, survey links, and places to collect outreach attempts. In addition to the early identification of those presumed to be eligible on their 17th birthday, the state also has a process to identify those who have newly entered foster care by running a weekly process (most states run a daily process). Table 3 shows the cohort participation at 17 years old.

Table 3. Cohort Participation

Cohort 1 at Age 17	Cohort 2 at Age 17	Cohort 3 at Age 17	Cohort 4 at Age 17*
32%	81%	86%	68%
272 out of 854	344 out of 427	318 out of 370	262 out of 383

\*Current as of the 2022B

#### 4.3.3. Data Collection on Youth Outcomes at 19 and 21 Years Old

To administer the survey, UWSC downloads bi-annual reports from the eWiSACWIS to determine eligibility for 19- and 21-year-olds. The UWSC conducts a similar outreach approach for surveying 19- and 21-year-olds as they do outreach to 17-year-olds.

To determine who is in the follow-up reporting population, eWiSACWIS maintains a report for each of the NYTD populations (follow-up at ages 19 and 21). Each follow-up report includes young people who completed the survey as 17-year-olds. DCF is aware that these reports sometimes erroneously include young people who did the survey at age 17 but were ultimately not eligible for NYTD (for example, due to completing the survey after exiting care or being in an ineligible type of care). The NYTD Coordinator and BCRA staff are working to refine these reports to ensure only those individuals who were properly in the baseline population are included in the follow-up reports. During the onsite phase, the state was reminded of the federal resource, the “Cohort Management Report,” which identifies who the NYTD system expects to report at follow-up. By using the determination made by eWiSACWIS of who is in the follow-up and not using the “Cohort Management Report,” the state may be surveying youth who are not eligible for follow-up.

Table 4 summarizes Wisconsin’s follow-up survey effort. The state has continued to increase survey participation since NYTD began in FFY 13.

Table 4. Summary of Follow-Up Survey Effort to Date in Wisconsin

Reporting Period	Participation Rate for Youth in Care	Participation Rate for Youth Discharged From Care
<b>Cohort 1 at Age 19 (FFY 13)</b>	65% 20 out of 31	41% 95 out of 229
<b>Cohort 1 at Age 21 (FFY 15)</b>	NA% <sup>5</sup> NOT REPORTED	60% 57 out of 95
<b>Cohort 2 at Age 19 (FFY 16)</b>	81% 35 out of 43	59% 172 out of 290
<b>Cohort 2 at Age 21 (FFY 18)</b>	67% 4 out of 6	55% 185 out of 337
<b>Cohort 3 at Age 19 (FFY 19)</b>	74% 23 out of 31	66% 183 out of 279
<b>Cohort 3 at Age 21 (FFY 21)</b>	0% 0 out of 0	55% 167 out of 304
<b>Cohort 4 at Age 19 (FFY 22)</b>	77% 23 out of 30	67% 154 t of 229

#### 4.4 Sampling and File Reporting

To date, the state has not opted to sample. As a result, **General Requirement #5, the state follows ACF's sampling procedures**, is not applicable and will not receive a rating.

**General Requirement #6, the state reports NYTD data files following ACF's specifications**, received a "2" rating. During the review, the Children's Bureau examined Wisconsin's code in eWISACWIS and discovered that the code has a number of "checks" at the end of the file processing. These checks occur before the state creates the XML file to upload to the Children's Bureau via the NYTD Portal for their semi-annual NYTD submission. The federal "Internal Consistency Checks" (ICCs) and the federal "Data Quality Advisories" (DQAs) are performed by the NYTD Portal upon submission of a NYTD file by a state. While checks can be a helpful tool to identify data quality or other issues, changing or "defaulting" to specific values to be in compliance with federal specifications without individual review is problematic.

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<sup>5</sup> When Cohort 1's 21-year-olds were being surveyed, they were not eligible to be in foster care. Wisconsin opted to extend federal foster care until age 21, with an effective date of 1/1/2015.

For example, **element 18 (education level)** is being defaulted to "11" to conform to federal technical specifications when performing these checks.

## 4.5 Data Quality, Analysis, and Use

### **General Requirement 7**

**General Requirement #7, the state conducts quality assurance to ensure NYTD information can be analyzed and used**, received a "2" rating. During the NYTD review, we identified technical challenges in data quality across the data elements.

Wisconsin tracks outcomes related to independent living in two primary ways: Transition Resource Agencies' (TRAs) biannual outcome reporting and National Youth in Transition Database (NYTD) survey results. The state has a CQI Advisory Committee comprised of DCF staff and county leaders to continually share information about all aspects of the child welfare service delivery system and work towards an overarching goal of gathering continuous feedback to inform improved practices. The state uses this committee to formulate CQI guidance related to data analysis and key takeaways. This committee is routinely brought into discussions about areas of DCF practice to ensure a strong feedback loop with counties.

The NYTD Review highlighted several opportunities to enhance the CQI efforts specifically related to NYTD data collection and the quality of services offered to youth aging out of foster care.

- **Use of data dashboards to display NYTD Wisconsin-specific findings.** Wisconsin highlighted its robust data dashboards, which display a variety of outcomes and metrics related to safety, permanency, and well-being. The state should explore the possibility of displaying NYTD data in this format. During community partner interviews, several IL providers mentioned that they were either not aware of NYTD or they had no idea of what the data revealed about the experiences of the state's young people.
- **Enhance training to the field on the purpose and use of NYTD.** Several community partners shared that more training about what NYTD would be useful in their various roles of provider, young person, caseworker, etc.
- **Engaging young people in the review of data and ongoing discussions about IL services in the state.** Many in the focus group for young people spoke of awareness of NYTD as it related to the survey. Still, they were unaware of the findings or how the state used the information to actually 'do anything.'
- **Engaging partners in the review of data and discussions of system improvement.** Wisconsin has several existing forums and processes that can be used to improve services. The state is leveraging existing forums, processes, etc., to improve services and develop feedback loops to keep participants and recipients better informed about the needs of young people and the state's responses to those needs.

## 5. Conclusion and Next Steps

### 5.1 Conclusion

As noted in Section 1.2, the NYTD Review is a comprehensive evaluation of a state's methodology for collecting and reporting NYTD data. This report summarizes NYTD findings, including the extent to which the state meets all of the NYTD requirements, and collects and reports high-quality data on the 58 NYTD data elements. Demonstrating its commitment to assisting states with accurate and timely NYTD data collection and reporting, the Children's Bureau will work with Wisconsin to assess options for system and business process improvements during the NYTD Improvement Plan phase.

### 5.2 NYTD Improvement Plan

In support of continuous quality improvement, states must complete and monitor a NYTD improvement plan based on findings from the NYTD Review for any elements/general requirements that did not receive a "4" rating factor. The Children's Bureau will provide an improvement plan template for the state's use, but the state may opt to use its own tool for this purpose, provided that it conveys the information necessary to monitor the state's action planning and progress. After receipt of this final report, the state should evaluate each general requirement and data element identified as needing correction and determine the time it will take to complete the item. Within 45 days of receipt of the final report, the state is to submit the initial improvement plan electronically to the Children's Bureau with estimated dates for completing each action item. The Children's Bureau Regional Office will work with the state to determine whether technical assistance is needed and available to implement the plan. All items in the improvement plan must be rated a "4" before the Children's Bureau considers the improvement plan complete. Once the improvement plan is completed and approved, the Children's Bureau will send a letter to the state acknowledging completion.

Upon receipt of the state's initial improvement plan, the Children's Bureau will review the due dates to ensure the state will implement the improvement plan in a timely manner. The state and the Children's Bureau use the electronic version of the improvement plan to track changes, document progress notes, and the Children's Bureau's approval of completed action items. As the state changes the program code, it should provide screenshots or other documentation noting the updates in the improvement plan.

The state must provide semiannual updates of its progress to the Children's Bureau. As updates are received and reviewed, the Children's Bureau will notify the agency of the subsequent improvement plan due date. Please note that the state must summarize its progress in implementing the NYTD improvement plan in its Annual Progress and Services Report (APSR) and, if applicable, the state's Advance Planning Document (APD) and provide updates to CCWIS.

## Appendix A. Test Case Findings

As noted in Section 2.1, the Children’s Bureau provided test case scenarios to the state on June 14, 2022. The state was able to enter, extract, and report these three of the six-test data from eWiSACWIS on August 17, 2022. However, the Children’s Bureau did not use the findings from the test cases to determine findings or ratings for NYTD the Review.

### Test Case 1 Findings:

- **Element 11 (Race – Unknown)** – The state incorrectly reported “no” for the element of “Race-unknown” for a multiracial youth with one race unknown.
- **Element 13 (Hispanic or Latino Ethnicity)** – The state incorrectly reported “unknown” for the element of “Hispanic or Latino Ethnicity.” The youth declined to provide ethnicity information.
- **Element 14 (Foster Care Status – Services)** – The state incorrectly reported “no.”
- **Element 20 (Independent Living Needs Assessment)** – The state incorrectly reported “no.”
- **Element 22 (Post-Secondary Educational Support)** – The state incorrectly reported “no.”
- **Element 23 (Career Preparation)** – The state incorrectly reported “no.”
- **Element 34 (Outcomes Reporting Status)** – The state incorrectly reported “Unable to locate.”
- **Element 37 (Current full-time employment)** – The state reported inconsistent findings.
- **Element 38 (Current part-time employment)** – The state reported inconsistent findings.
- **Element 39 (Employment-related skills)** – The state reported inconsistent findings.
- **Element 40 (Social Security)** – The state reported inconsistent findings.
- **Element 41 (Educational aid)** – The state reported inconsistent findings.
- **Element 42 (Public financial assistance)** – The state reported inconsistent findings.
- **Element 43 (Public food assistance)** – The state reported inconsistent findings.
- **Element 44 (Public housing assistance)** – The state reported inconsistent findings.
- **Element 45 (Other financial support)** – The state reported inconsistent findings.
- **Element 46 (Highest educational certification received)** – The state reported inconsistent findings.
- **Element 47 (Current enrollment and attendance)** – The state reported inconsistent findings.
- **Element 48 (Connection to adult)** – The state reported inconsistent findings.
- **Element 49 (Homelessness)** – The state reported inconsistent findings.
- **Element 50 (Substance abuse referral)** – The state reported inconsistent findings.
- **Element 51 (Incarceration)** – The state reported inconsistent findings.
- **Element 52 (Children)** – The state reported inconsistent findings.
- **Element 53 (Marriage at child's birth)** – The state reported inconsistent findings.
- **Element 54 (Medicaid)** – The state reported inconsistent findings.
- **Element 55 (Other health insurance coverage)** – The state reported inconsistent findings.
- **Element 56 (Health insurance type: Medical)** – The state reported inconsistent findings.
- **Element 57 (Health insurance type: Mental health)** – The state reported inconsistent findings.

- **Element 58 (Health insurance type: Prescription drugs)** – The state reported inconsistent findings.

Test Case 2 Findings:

- The state was unable to submit this test case.

Test Case 3 Findings:

- **Element 6 (Race - American Indian/Alaska Native)** – The state incorrectly reported “no” for the element of “Race - American Indian/Alaska Native”.
- **Element 14 (Foster Care Status – Services)** – The state incorrectly reported “no” for the element of “Foster Care Status – Services.”
- **Element 21 (Academic Support)** – The state incorrectly reported “no” for the element of “Academic Support.”
- **Element 33 (Other Financial Assistance)** – The state incorrectly reported “Other Financial Assistance” for the element of “Other Financial Assistance”.

Test Case 4 Findings:

- **Element 14 (Foster Care Status – Services)** – The state incorrectly reported “no.”
- **Element 15 (Local Agency)** – The state reported inconsistent findings.
- **Element 17 (Adjudicated Delinquent)** – The state reported inconsistent findings.
- **Element 18 (Education Level)** – The state reported inconsistent findings.
- **Element 19 (Special Education)** – The state reported inconsistent findings.
- **Element 20 (Independent Living Needs Assessment)** – The state reported inconsistent findings.
- **Element 21 (Academic Support)** – The state reported inconsistent findings.
- **Element 22 (Post-Secondary Educational Support)** – The state reported inconsistent findings.
- **Element 23 (Career Preparation)** – The state reported inconsistent findings.
- **Element 24 (Employment Programs or Vocational Training)** – The state reported inconsistent findings.
- **Element 25 (Budget and Financial Management)** – The state reported inconsistent findings.
- **Element 26 (Housing Education and Home Management Training)** – The state reported inconsistent findings.
- **Element 27 (Health Education and Risk Prevention)** – The state reported inconsistent findings.
- **Element 28 (Family Support/Healthy Marriage Education)** – The state reported inconsistent findings.
- **Element 29 (Mentoring)** – The state reported inconsistent findings.
- **Element 30 (Supervised Independent Living)** – The state reported inconsistent findings.
- **Element 31 (Room and Board Financial Assistance)** – The state reported inconsistent findings.
- **Element 32 (Education Financial Assistance)** – The state reported inconsistent findings.
- **Element 33 (Other Financial Assistance)** – The state reported inconsistent findings.
- **Element 34 (Outcomes Reporting Status)** – The state incorrectly reported “unable to locate.”

- **Element 36 (Foster Care Status – Outcomes)** – The state incorrectly reported “yes.”

Test Case 5 Findings:

- The state was unable to submit this test case.

Test Case 6 Findings:

- The state was unable to submit this test case.

## Appendix B. Case Review Findings

As noted in Section 3.1, the Children’s Bureau drew a random sample of 30 youth records (10 records from each reporting population from the last data file containing information on that population) and provided encrypted youth identification numbers to the state so these records could be made available for review during the onsite review. Wisconsin provided electronic and paper records for these youth in support of the case review. The periods under review were 2023A File (October 1, 2022, to March 31, 2023) for youth in the served and baseline populations and 2022B (April 1, 2022, to September 30, 2022) for youth in the follow-up population. Of the 30 records in the sample, 30<sup>6</sup> records were reviewed, and the findings are summarized below.

### Case Record 1 Finding:

- **Element 14 (Foster care status – services)** – The state reported “no” for foster care status; however, the youth was in foster care (Residential Care Center (RTC)) during the period under review.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported but was not conducted during the period under review (8/30/2022).
- **Element 56 (Health insurance type: Medical)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “does not know”; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

### Case Record 2 Finding:

- **Element 30 (Supervised Independent Living)** – Underreported Services – The caseworker listed that the youth was moved into their own apartment at Well Point Supervised Independent Living on 3/2/2023.

### Case Record 3 Finding:

- **Element 18 (education level)** – The state reported that the last grade completed was 11th grade; however, case notes showed that the young person completed 12th grade on 5/28/2022 and was enrolled in college in the Fall of 2022. The record had not been updated.
- **Element 19 (special education)** – The state reported “no” for special education”; however, reviewers found a current IEP during the period under review (while the student was in secondary education).
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not completed during the period under review (6/19/2018).

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<sup>6</sup> A partial case review occurred for case #25, #27, #28, and # 29.



- **Element 31 (Room and board financial assistance)** – In the state’s IL Services Tab, there was information that the young person was provided financial assistance for items related to moving into the dorm. Because it is an item related to room and board, it should be reported in this service category (it was categorized under **element 32**, “educational financial assistance”).
- **Element 32 (Education Financial Assistance)** – Unreported service. The young person received educational financial assistance during the period under review (9/7/2022), which was listed on the IL Services Tab for educational financial assistance. The service category on the IL Services tab did have an end date, but it was in the next reporting period.
- **Element 33 (Other Financial Assistance)** – Unreported service. The young person received gas card payments during the period under review (5/17/2022 and 6/6/2022). This was reported in the IL Services Tab, but the service did not have an end date.
- **Element 56 (Health insurance type: Medical)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “yes”; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

Case Record 4 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care (RCC) in the state during the period under review.
- **Element 20 (Independent Living Needs Assessment)** – On 11/1/22, the worker entered a date that they determined the youth was unable to take the independent living needs assessment. Because a date was entered into the IL Needs Assessment field, it was reported as a “yes” that an independent living needs assessment was completed, but it was not.

Case Record 5 Finding:

- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (6/14/2019).

Case Record 6 Finding:

- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review. The case was closed before the period under review (5/4/2016).

Case Record 7 Finding:

- No findings to report.

#### Case Record 8 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care in the state during the period under review.
- **Element 18 (Education Level)** – The state reported that the young person was in 9th grade; however, case notes reported that the highest grade completed by the young person was 10th grade during the period under review.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (11/11/2021).

#### Case Record 9 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care in the state during the period under review.
- **Element 17 (Adjudicated delinquent)** – The state reported no; however, there was evidence of an adjudication during the period under review. Reviewers found court documents.
- **Element 18 (Education Level)** – The state reported that the young person completed 9th grade; however, during case review, the records showed that the young person completed 10th grade. This information was found in the IEP.
- **Element 19 (Special Education)** – The state reported “no” for special education; however, an IEP was found in the case record review, current during the period under the review.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (September 2021).

#### Case Record 10 Finding:

- **Element 18 (Education Level)** – The state reported that the young person completed 10th grade; however, during the case review, the records showed that the young person had graduated from high school. Therefore, the last grade completed should be “12.”
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (10/23/2019).

#### Case Record 11 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care in the state during the period under review.
- **Element 18 (Education Level)** – The state reported 11th grade. On the education tab, the field is completed as “10<sup>th</sup>.” It is unclear how “11th” was reported.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (10/8/2020).
- **Element 40 (Social Security)** – The question was not on the survey. Reviewers opened the survey that was reported in eWiSACWIS, and the question was not there. The state reported, “declined.”

- **Element 56 (Health insurance type: Medical)** – The young person reported “don’t know” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “yes”; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

Case Record 12 Finding:

- **Element 18 (Education Level)** – The state reported 12th grade; however, there is no report of the young person completing 12th grade; the state should have reported 11th grade. Upon closer review of the documents, it appears the student was able to walk for graduation but did not have enough credits to receive the high school diploma.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (7/22/2019).
- **Element 56 (Health insurance type: Medical)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “yes”; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

Case Record 13 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was in foster care. However, the young person was not in the care of the state during the period under review.
- **Element 18 (Education Level)** – The state reported 10th grade; however, there is no report of the young person completing 10th grade; the state should have reported 12th grade. Reviewers found that there was a graduate date of 5/30/2021 and subsequent information in January 2023 about helping the youth enroll in college.
- **Element 19 (Special Education)** – The state reported “yes” for special education. However, the young person had graduated high school before the period under review. Therefore, special education cannot be provided.

Case Record 14 Finding:

- **Element 4 (Date of Birth)** – During the case record review, two dates of birth were reported in the case record review. No birth certificate was provided, so reviewers could not verify the correct date of birth. Overall, reviewers found it unclear what the month was for the date of birth (October or December). Disposition reports are listed for one month, and the person

management tab is listed for another month. Other paperwork in the file alternated between October and December).

Case Record 15 Finding:

- **Element 18 (Education Level)** – The state reported 10th grade; however, the state should have reported 11th grade.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (10/14/2022).

Case Record 16 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care in the state during the period under review.
- **Element 18 (Education Level)** – The state reported 10th grade; however, notes and records in the file report that the youth had completed the 11th grade.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (5/22/2023). Because the system does not show historical dates, reviewers are unable to determine if a prior date was reported.
- **Element 33 (other financial Services)** – Underreported services. The IL Service screen reported that the young person received other financial assistance: a gas card (1/26/2023) and phone cards (3/2/2023 and 3/16/2023), but they were not reported. All three items did not have an end date.
- **Element 56 (Health insurance type: Medical)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “yes”; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “yes” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

Case Record 17 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care during the period under review.
- **Element 18 (Education Level)** – The state reported 10th grade. Education records in the educational passport report the youth is currently in 10th grade. Therefore, 9th grade should be reported.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported (8/7/2020), but it was not conducted during the period under review.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “don’t know” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “don’t know” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

Case Record 18 Finding:

- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported (5/14/2018), but it was not conducted during the period under review.

Case Record 19 Finding:

- **Element 14 (Foster care status – services)** – The state reported that the young person was not in foster care. However, the young person was in foster care during the period under review.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported (8/13/2020), but it was not conducted during the period under review.
- **Element 57 (Health insurance type: Mental health)** – The young person reported “no” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.
- **Element 58 (Health insurance type: Prescription drugs)** – The young person reported “no” on the survey; however, the state reported “not applicable.” The question should not have been asked – an error in skip logic.

Case Record 20 Finding:

- No findings to report.

Case Record 21 Finding:

- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported (4/13/2021), but it was not conducted during the period under review.
- **Elements 33 (Other Financial Services)** – The state reported “no”; however, on the IL Services Screen, multiple services were provided under other financial assistance (4/18/2022, 5/20/2022, 6/24/2022). Additional support was provided for phone cards, fines, and other payments. None of the services had an end date.

Case Record 22 Finding:

- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported (3/25/2019), but it was not conducted during the period under review.
- **Element 27 (Health Education and Risk Prevention)** – Underreported service. The state reported “no”; however, case notes on 8/6/2022 reported that the caseworker helped the young person set up doctor’s appointments and get access to prescriptions related to pregnancy prevention.

Case Record 23 Finding:

- No findings to report.

Case Record 24 Finding:

- **Element 18 (Education Level)** – The state reported 9th grade; however, other information in eWISACWIS supports the youth had completed 11th grade.

- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported (5/22/20), but it was not conducted during the period under review.

Case Record 25 Finding:

- Partial case record review completed.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (10/2/2020).

Case Record 26 Finding:

- No findings to report.

Case Record 27 Finding:

- Partial case record review completed.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (3/20/2020).

Case Record 28 Finding:

- Partial case record review completed.
- **Element 20 (Independent Living Needs Assessment)** – An independent living needs assessment was reported, but it was not conducted during the period under review (5/31/2016).

Case Record 29 Finding:

- Partial case record review completed.
- No findings to report.

Case Record 34 Finding (replaced Case Record 30):

- **Element 19 (Special Education)** – The state reported that there was no IEP. However, an IEP plan was found in the case file (3/3/2023).
- **Element 26 (Housing education and home management training)** – The state reported that a service was provided; however, information was pulled from the ILTD screen with a goal to be completed by 1/27/2023. It was unclear if the goal was completed and if the goal rose to the level of service. The goal was to take a tour and interview at the local Transitional Living Program (TLP).
- **Element 27 (Health education and risk prevention)** – The state reported that a service was provided; however, information was pulled from the ILTD screen with a goal to be completed by 1/12/2023. It was unclear if the goal was completed. The ILTD reported the goal was to attain BadgerCare and provide education about the importance of power of attorney.
- **Element 32 (Education financial assistance)** – The state reported that a service was provided; however, information was pulled from the ILTD screen with a goal to be completed by 2/24/2023. It was unclear if the goal was completed. The goal was to discuss interest in school.

## Appendix C. NYTD General Requirements and Data Elements

**General Requirement 1: The state reports information on all youth in the served population.**

**Rating: 2**

**Findings:**

CB found technical and data quality issues in how the state reports information on all the young people in the served population. IL services are delivered by the counties under the age of 18 and those who remain in foster care after the age of 18 (the state has very limited extended foster care for youth completing secondary education). Services for those over the age of 18 and who have left foster care are provided by Regional “Transition Resource Agencies” (TRAs). TRAs are often community-based organizations that provide a range of services to young people in transition, some of which are not funded by the Chafee program.

All NYTD services are reported by using eWiSACWIS. Upon becoming eligible for independent living services, the caseworker at the county level can “create” the IL Services module in eWiSACWIS. The IL module has several tabs that collect information on a range of activities related to independent living, including eligibility, referral to Transition Resource Agencies (TRAs), information related to goals, the transition plan, vital documents, and the NYTD survey. To report a service, the caseworker of TRA must enter it on the “Services Tab.” There is a table entitled “Independent Living Services” where the following information is entered: “service category,” “service/activity,” “provider/ responsible person,” “begin date,” and “end date.” The service categories are the 12 service categories (the IL Need Assessment is entered on the “Assessment/ Plan” tab of the independent living module).

Per policy and procedures, the county caseworker should enter all services provided to the youth/ young adult, including those provided by the youth’s placement or foster parent. During the technical meetings, we also learned that a few NYTD services can also be reported by the worker on the ILTD screen. On the ILTD screen, there are goals related to “housing” (**element 26- housing education and home management training**), “health” (**element 27- health education and risk prevention**), “education” (**element 22 post-secondary educational support, element 23- career preparation, and element 32 – education financial assistance**), “mentors and/or other supportive adults identified” (**element 29- mentoring**) “income,” and employment services and workforce supports.” Each of these categories has a “Date to be Completed” to be entered. If the “Date to be Completed” is in the reporting period, it will generate a service under one of those categories being reported as a service.

**Technical Issue: Foster Care Status – Services (element 14)** is being reported incorrectly. **Element 14** should report foster care status if they were in foster care on any day during the reporting period.

To report an independent living needs assessment (**element 20**), the caseworker enters a date in the Independent Living screen on the Assessment/ Plan Tab in eWiSACWIS. However, the code in eWiSACWIS does not check for when the assessment was delivered. The state should only report an independent living needs assessment conducted during the reporting period. In addition, the tab also has an “Independent Living Assessment Revised” field to enter a date, but it is not reported to NYTD. Both fields can be written over.

Reporting service in the ILTD tab presumes that the goals outlined are to be completed 1) completed on time and 2) involved in the provision of an IL service. Therefore, it is hard to determine that an IL service has been delivered for **elements 22, 23, 26, 27, 29, and 32**.

Overall, the federal team remains concerned about the underreporting of services. For example, there is an expectation that at 14 years and six months, an IL needs assessment is completed for any youth in foster care. A “tickler” in the system tracks the completion of the IL Assessment. In addition, in conducting the case record review, it is unclear how the end date impacts the reporting of services. For example, it is unclear if a service is reported if the “begin date” and “end date” are in different reporting periods or if there is no “end date” entered. It is also evident that the state is underreporting tribal youth. In particular, if a young person is served by the tribal IL program, the state does not report IL services or outcomes to the Children’s Bureau. In discussions with Wisconsin individuals clearly shows different understandings of how, when, and where to report IL services in eWiSACWIS.

When an IL service is reported (**elements 20-33**), the state must also report social-demographic information in **elements 14-19**. We found technical issues with some of those elements and examples where the information had not been updated (this may also be a product of element 20 continuing to be reported long after the case has closed).

See Table C1 for the reported number of services by age that the state has reported.

**Table C1. Number and percent receiving IL Services by Age**

Age at End of Period	20A		20B		21A		21B		22A		22B		23A	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
<b>14</b>	39	5.7	27	4.7	19	4.2	17	4.0	19	3.7	11	2.2	16	4.4
<b>15</b>	73	10.8	69	11.9	49	10.8	51	12.0	47	9.0	54	10.8	33	9.0
<b>16</b>	87	12.8	94	16.2	63	13.9	61	14.4	54	10.4	58	11.6	39	10.7
<b>17</b>	213	31.4	201	34.7	64	14.1	73	17.2	65	12.5	68	13.6	109	29.9



Age at End of Period	20A		20B		21A		21B		22A		22B		23A	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent	Number	Percent
<b>18</b>	28	4.1	36	6.2	27	5.9	29	6.8	30	5.8	27	5.4	17	4.7
<b>19</b>	5	0.7			2	0.4	3	0.7	141	27.1	115	23.0	2	0.5
<b>20</b>	6	0.9			2	0.4								
<b>21</b>	134	19.7	143	24.7	217	47.8	187	44.0	164	31.5	166	33.3	149	40.8
<b>22 +</b>	94	13.8	9	1.6	11	2.4	4	0.9						
<b>Total</b>	679	100.0	579	100.0	454	100	425	100	520	100.0	499	100.0	365	100.0

Finally, the state is only receiving aggregate information on tribal youth served by the Chafee/ETV program through a tribal agreement due to tribal data sovereignty concerns. CB explained that tribal children receiving services through Chafee ETV funds must be reported to NYTD as part of the served population.

Due to the technical and data quality issues, General Requirement #1 is rated as a “2.” Due to the over-reporting of **element 20**, which impacted CB’s ability to understand the accuracy of services being reported to NYTD, CB reserves the right to conduct a small-scale case review of cases that reported receiving services to satisfy the improvement planning process.

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**General Requirement 2: The state reports information on all youth in the baseline population.**

**Rating: 2**

**Findings:**

The state of Wisconsin has contracted with the University of Wisconsin Survey Center (UWSC) to administer the NYTD survey. In eWisACWIS, the system identifies members who are eligible for the baseline by looking at their date of birth and foster care status. That information is populated into the report (Y17). The information from the state is populated into the Project Operation Database, which creates emails, survey links, and places to collect outreach attempts.

In addition to the early identification of those presumed to be eligible on their 17<sup>th</sup> birthday, the state also has a process to identify those who have newly entered foster care by running a weekly process (most states run a daily process).

During the review, CB and the state had a conversation regarding collecting and reporting data for tribal young people. Currently, youth in tribal foster care are not being invited to participate in the NYTD survey.

**Technical Issue:** For youth who turn 17 within 45 days from the end of the reporting period, the state is not reporting those records during the correct reporting period if the young person completes the survey in the following reporting period. The state must report those records in both the reporting period of the youth’s birthday and if the survey is completed in the next reporting period. The following submission that corresponds with the reporting period in which the youth participated in the survey must contain information on the survey ([45 CFR 1356.83\(d\)](#); [NYTD Q&A #1.42, 2.56, 2.60](#)).

The state has 45 days to survey the youth after their 17<sup>th</sup> birthday to be considered timely; however, about a week before the due date, UWSC will send an email with the subject line: “Unable to reach 17-year-old for NYTD Survey.” This email lets the county staff know that UWSC has not reached the young person in time and asks the county staff to mark a reason for non-completion on the young person’s Independent Living page in eWisACWIS before the due date. States should use the full 45 days to outreach and locate the youth to participate in the survey.

Documents that the state provided CB as part of the Pre-Onsite Phase showed that the state does not currently allow youth to take the survey more than 45 days after the youth’s 17th birthday. As specified in [NYTD Q&A #2.56](#) and [#5.9](#), we encourage states to continue efforts to engage youth in the NYTD survey beyond the 45-day timeframe.

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**General Requirement 3: The state reports information on all youth in the follow-up population.**

**Rating: 3**

**Findings:**

As with the baseline survey, UWSC is responsible for the location, engagement, and administration of the NYTD Survey at follow-up.

**Data Quality Issues:** The state’s files have not consistently passed the outcome compliance standard. Please refer to [Wisconsin’s Data Snapshots](#) for detailed information on compliance in the follow-up populations.

To determine who is in the follow-up reporting population, eWisACWIS maintains a report for each of the NYTD populations (follow-up at ages 19 and 21). Each follow-up report includes young people who completed the survey as 17-year-olds. DCF is aware that these reports sometimes erroneously include young people who did the survey at age 17 but were ultimately not eligible for NYTD (for example, due to completing the survey after exiting care or being in an ineligible type of care). The NYTD Coordinator and BCRA staff are working to refine these reports to ensure only those individuals who were properly in the baseline population are included in the follow-up reports. During the onsite phase, the state was reminded of the federal resource, the “Cohort Management Report,” which identifies who the NYTD system expects to report at

follow-up. By using only the determination made by eWiSACWIS of who is in the follow-up and not using the “Cohort Management Report,” the state may be surveying youth who are not eligible for follow-up.

Caseworkers are sent an email one month before the end of the reporting period asking workers to provide a reason why the young adult has not completed the survey ([element 34- outcome reporting status](#)).

Because meeting compliance rates at follow-up is critical, the state is urged to continue developing additional methods to data mine for useful contact information, especially for young adults who have left foster care at the age of 18. At age 17 and afterward, the survey does ask youth/ young adults to identify contacts at the end of the survey. However, the IL module in eWiSACWIS has a place for additional contact information to be entered. However, UWSC only has access to certain information that is provided to them by eWiSACWIS. Reviewers found a few incidences in the case record review where additional engagement and/or research may have yielded contact with the young person to take the survey.

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**General Requirement 4: The state implements an appropriate survey methodology to collect youth outcome data.**

**Rating: 2**

**Findings:**

Since the beginning of NYTD, the state of Wisconsin has invested in a contract to administer and oversee the survey efforts for NYTD. Currently, the UWSC is under contract with the state. Due to UWSC's role as a professional research service for the NYTD Review, the team received an unprecedented number of detailed documents, information, and resources related to the survey administration. Notably, the outreach efforts utilize technology to administer the survey and compensate youth/ young adults.

A mailer with a link to the website and a unique code is sent to the youth/ young person based on the information provided by the state of Wisconsin (from eWiSACWIS). Notably, a cash incentive is included in the mailing to incentivize participation, and another incentive is given upon completion of the survey. The youth/ young adult is given the option to keep the survey confidential or to be able to share it with individuals assigned to their case in eWiSACWIS. If shared, it can be found in the IL Services module if the module has been activated for the youth.

When the youth/ young adult cannot be surveyed, the UWSC emails the primary worker to enter into eWiSACWIS the reason for non-participation ([element 34](#)). Overall, the UWSC provides helpful information on documenting the reason for non-participation. However, not all information provided addresses all the outcomes reporting status in a way to ensure consistency across the reasons. Finally, we note that UWSC is responsible for the outreach, engagement, and invitation to the youth/ young adults, but it is the caseworker/ TRA/ other DCF staff who determines a youth/ young adult reason for not participating in the survey.

**Technical Issues:** The state needs to make corrections for the 17, 19, and 21-year-old surveys. For each of the NYTD questions, the state must include the option “decline” as an available choice for the young people who take the survey. The youth must have the ability to actively decline the survey. Because “decline” is not an option for the elements related to the survey, the state will receive a 2 (a technical issue) for the corresponding data elements and general requirements during the NYTD review. The exact wording and answers of the NYTD survey questions are located on CB’s website in [Technical Assistance Brief NYTD Survey Questions](#).

The state should continue to work with UWSC to determine how to share better information for youth/ young people who have not been engaged.

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**General Requirement 5: The state follows ACF’s sampling procedures (applicable to states opting to sample only).**

**Rating: NA**

**Findings:**

This general requirement does not apply to Wisconsin as the state did not opt to sample.

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**General Requirement 6: The state reports NYTD data files following ACF’s specifications.**

**Rating: 2**

**Findings:**

**Technical issues:** As part of the review, the federal team examined Wisconsin’s code and found that it has a number of “checks” at the end of the file processing. These checks occur before the state creates the XML file to upload to the NYTD Portal for their semi-annual NYTD submission. Upon examination, many of the checks are tied to federal “Internal Consistency Checks” (ICCs) and “Data Quality Advisories” (DQAs) performed by the NYTD Portal upon submission of a NYTD file by a state. Data elements are being defaulted to conform to federal technical specifications when performing these checks.

While checks can be a helpful tool to identify data quality or other issues, changing or “defaulting” to specific values to be in compliance with federal specifications without individual review is problematic. This includes changing a youth/ young adult’s response to survey questions.

In addition, **element 18 (educational level)** defaults to “11.”

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**General Requirement 7: The state conducts quality assurance to ensure NYTD information can be analyzed and used.**

**Rating: 2**

**Findings:**

The state appears to have a framework for identifying areas of strength and those needing attention. However, the NYTD Review highlighted several opportunities to enhance the CQI efforts specifically related to NYTD data collection and the quality of services offered to youth aging out of foster care.

- **Use of data dashboards to display NYTD Wisconsin-specific findings.** Wisconsin highlighted its robust data dashboards, which display a variety of outcomes and metrics related to safety, permanency, and well-being. WI should explore the possibility of displaying NYTD data in this format. During community partner interviews, several IL providers mentioned that they were either not aware of NYTD or they had no idea of what the data revealed about the experiences of WI's young people.
- **Enhance training to the field on the purpose and use of NYTD.** Several community partners shared that more training about what NYTD would be useful in their various roles of provider, young person, caseworker, etc.
- **Engaging young people in the review of data and ongoing discussions about IL services in the state.** Many in the focus group for young people spoke of awareness of NYTD as it related to the survey, but they were unaware of the findings or how the information was actually used to 'do anything.'
- **Engaging partners in the review of data and discussions of system improvement.** Wisconsin has several existing forums and processes that can be used to improve services and is leveraging existing forums, processes, etc., to improve services and develop feedback loops to keep participants and recipients better informed about the needs of young people and the state's responses to those needs.

In community partner interviews, we spoke with many supportive professionals who had not heard about the state's NYTD data collection efforts or reviewed the state's data. In our focus groups, young people expressed frustration with not knowing how NYTD data is used. We strongly encourage the state to establish a feedback loop with young people, local agencies, and other community partners so that they can learn how NYTD data can inform their understanding of the experiences of young people. In order to further the state's efforts to analyze and use NYTD data as part of a CQI framework, we recommend the following strategies:

- Integrating NYTD data with other administrative data sets like AFCARS.
- Analyzing NYTD data in conjunction with what else is known about services provided to youth (e.g., services not paid for provided by Chafee but paid for provided by local mentoring programs, workforce development programs, etc.) to determine which services (type/intensity) really lead to improved outcomes.

- Conducting analyses to identify different response rates to youth by demographic variable and by administration method (e.g., surveys conducted by phone versus surveys completed online).
- Conducting service data analysis data by locality to determine gaps in services or service needs.
- Disseminating NYTD data to state staff, youth, service providers, courts, foster parents, and other community partners.
- Continuing efforts to develop and use a youth-specific tool to conduct case reviews.
- Developing performance measures using NYTD data to raise the visibility of practice issues impacting transitioning youth.

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#### Data Element 1: State

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### Data Element 2: Report Date

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### Data Element 3: Record Number

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### Data Element 4: Date of Birth

**Rating: 3**

**Findings:**

**Data Quality Finding:** Case Record Review, Case Record #14 – The state had multiple use of two dates of birth in the case file, using either 10 or 12 as the month. With no birth certificate on file, reviewers could not verify the correct date of birth. Overall, during the case record review, reviewers did not find copies of documents, such as a birth certificate, to prove that the date of birth is correct.

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#### Data Element 5: Sex

**Rating: 4**

**Findings:**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### Data Element 6: Race: American Indian or Alaska Native

**Rating: 2**

**Findings:**

**Technical issue:** During the system demonstration, we learned that the data fields associated with **element 6** and **element 16** (federally recognized tribe) are linked such that a value can only be entered for **element 16** if a youth is also reported to be American Indian or Alaska Native (“yes” for **element 6**). While not mutually exclusive, **elements 6** and **16** are different elements that must be captured separately. Like all race information, **element 6** is a self-identified description indicative of how a person views themselves and his affiliation with a tribal community. **Element 16**, by contrast, focuses on either enrollment in or eligibility for membership in one of the over 560 federally recognized tribes only.

During the onsite review, reviewers learned that the state also has the ability to select “Native” as a drop-down under “Ethnicity” on the Person Management screen. However, this information is not mapped to be reported to NYTD.

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#### Data Element 7: Race: Asian

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### Data Element 8: Race: Black or African American

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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**Data Element 9: Race: Native Hawaiian or Other Pacific Islander**

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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**Data Element 10: Race: White**

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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**Data Element 11: Race: Unknown**

**Rating: 2**

**Findings:**

**Technical issue:** eWiSACWIS does not allow the selection of “Race: Unknown” in combination with other races ([elements 6–10](#)).

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**Data Element 12: Race: Declined**

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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**Data Element 13: Hispanic or Latino Ethnicity**

**Rating: 4**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### Data Element 14: Foster Care Status Services

**Rating: 2**

**Findings:**

**Technical Issue:** **Element 14** is being reported incorrectly.

During the case record review, CB found an error where **element 14** was not reported correctly. The error was found 9 times during the case record review. Case Record Review Cases #1, #4, #8, #9, #11, #13, #16, #17, and #19.

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#### Data Element 15: Local Agency

**Rating: 2**

**Findings:**

**Technical Issue:** **Element 15** must be reported based on the data in **element 14**. The state should report the FIPS code of the state/county that reflects the placement and care. The conditions that a youth is in foster care include:

- For youth in foster care, the state reports the five-digit FIPS code of the county or equivalent unit jurisdiction(s) that has primary responsibility for placement and care during the reporting period.
- For youth not in foster care, the state reports the five-digit FIPS code of the county or equivalent unit jurisdiction(s) that has primary responsibility for providing services during the reporting period. If the youth was served by two jurisdictions in the same report period, the state reports the FIPS code of the county/jurisdiction that most recently provided services to the youth.
- For a youth in foster care who leaves placement and care and receives services subsequently from another jurisdiction in the same report period, the state reports the FIPS code of the county/jurisdiction that most recently provided services to the youth, regardless of whether that agency had placement and care responsibility of the youth (**NYTD Q&A #2.62**).
- For out-of-state youth placed in the state under the Interstate Compact for the Placement of Children (ICPC), the state reports the FIPS code that corresponds with the jurisdiction in the sending state with placement and care responsibility for the youth.

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### Data Element 16: Federally Recognized Tribe

**Rating: 2**

**Findings:**

**Technical issue:** During the system demonstration, we learned that the data fields associated with **element 6 and element 16** (federally recognized tribe) are linked such that a value can only be entered for **element 16** if a youth is also reported to be American Indian or Alaska Native (“yes” for **element 6**) as their race. While not mutually exclusive, **elements 6 and 16** are different elements that must be captured separately. Like all race information, **element 6** is a self-identified description indicative of how a person views themselves and his affiliation with a tribal community. **Element 16**, by contrast, focuses on either enrollment in or eligibility for membership in one of the over 560 federally recognized tribes only.

When membership in a federally recognized tribe is still pending verification, the state reports “blank” for the element.

We also note that the field collecting Tribal membership can be activated if “Native American” is selected under the “Ethnicity” tab on the Person Management screen.

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### Data Element 17: Adjudicated Delinquent

**Rating: 3**

**Findings:**

**Data Quality Issue:** Case Record Review, Case Record #9 – CB found an error where adjudicated delinquent information was not updated or reported. Reviews found information in the case notes that the youth was adjudicated delinquent.

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### Data Element 18: Educational Level

**Rating: 2**

**Findings**

**Technical Issue:** eWiSACWIS defaults the education level to “11”. The state should not default to a particular education level in the system.

**Data Quality:** “College” should be reported if the young person has completed at least a semester of study.

Case Record Review, Case Record #3, #8, #9, #10, #11, #12, #13, #15, #16, #17, and #24 – CB found multiple cases where education was not being updated or reported based on the case notes. Some of these errors may be from when erroneous records were pulled from **element 20** (IL Needs Assessment).

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### Data Element 19: Special Education

**Rating: 3**

**Findings:**

**Technical issue:** On the “Education” Tab as part of Person Management, there is a check box entitled “Child has an Individualized Education Plan.” If this box is checked, a value of “yes” is reported to NYTD. For the purposes of NYTD, “Special Education” should only be reported if special education services are received during the reporting period.

**Data Quality Issue:**

Case Record Review, Case Record #3, #9, and #34. - CB found three cases where special education was not being updated or reported correctly (based on the case notes or other information in the file).

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### Data Element 20: Independent Living Needs Assessment

**Rating: 2**

**Findings:**

**Technical issue:** The IL Services Screen allows the user to enter a date that an IL Needs Assessment was completed. However, this element does not have a date range to determine if the IL Needs Assessment was conducted during the reporting period. Therefore, the state is reporting to NYTD if an IL Needs Assessment was ever completed instead of during the period of review.

In addition, there is an additional field, “Independent Living Assessment Revised,” but that information is not reported to NYTD. Both fields have editing capability, which allows them to be written over, but this does not allow the caseworker or TRA staff to review the history of IL Assessments completed or revised.

Case record review: CB found 21 cases where **element 20** was incorrect (the IL Needs Assessment date was not during the reporting period). Case Record #1, #3, #4, #5, #6, #8, #9, #10, #11, #12, #15, #16, #17, #18, #19, #21, #22, #24, #25, #27, and #28.

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### Data Element 21: Academic support

#### Rating: 2

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the “date to be completed” field, it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

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### Data Element 22: Post-secondary educational support

#### Rating: 2

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity. CB does not have a technical understanding of why services weren’t reported.

The state has the ability for the worker to create an IL services screen in eWisACWIS. This screen allows the worker to provide information on IL services, supports, and needs. These screens can also be used to refer a youth to transition resource agencies (TRA).

For NYTD, the IL module and screen collect and collect and report NYTD data. In the IL module, there is a tab called IL services where case workers and TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported.

THE IL TD screen. Workers can also identify goals that map to NYTD service categories. They also entered a field “date to be completed.” Currently, eWisACWIS maps any goal with a date to be completed by NYTD; however, it is unclear if the services provided to achieve that goal and if that goal was actually completed.

An assumption in the system is that the service was completed, but this does not support that an actual service was provided and completed.

In addition to the IL services screen, the state also reports IL services for this category on the IL TD screen. When a case worker or TRA worker enters a goal in this category, they also enter a goal by which the date is completed.

**Technical Issue:** According to the screen explained on the ILTD tab, where the IL data is entered on the eWiSACWIS screen, [elements 22, 23, 26, 27, 29, and 32](#) are populated based on the entry of goals related to different services. Those goals can be numbered, which is why the fields used in the OR clause indicate Goal numbers.

- DT\_ANTCPTD\_PS\_EDCTN\_GOAL2 (Date to be completed – Education – Goal 2)

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### Data Element 23: Career Preparation

**Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity. CB does not have a technical understanding of why services weren't reported.

The state has the ability for the worker to create an IL services screen in eWiSACWIS. This screen allows the worker to provide information on IL services, supports, and needs. These screens can also be used to refer a youth to transition resource agencies (TRA).

For NYTD, the IL module and screen collect and collect and report NYTD data. In the IL module, there is a tab called IL services where case workers and TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported.

THE IL TD screen. Workers can also identify goals that map to NYTD service categories. They also entered a field "date to be completed." Currently, eWiSACWIS maps any goal with a date to be completed by NYTD; however, it is unclear if the services provided to achieve that goal and if that goal was actually completed.

The system assumes that the service was completed, but this does not support that an actual service was provided and completed.

In addition to the IL services screen, the state also reports IL services for this category on the IL TD screen. When a case worker or TRA worker enters a goal in this category, they also enter a goal by which the date is completed.

**Technical Issue:** According to the screen explained on the ILTD tab, where the IL data is entered on the eWiSACWIS screen, [elements 22, 23, 26, 27, 29, and 32](#) are populated based on the entry of goals related to different services. Those goals can be numbered, which is why the fields used in the OR clause indicate Goal numbers.

- DT\_ANTCPTD\_PS\_EDCTN\_GOAL1 (Date to be completed – Education – Goal 1)

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**Data Element 24: Employment programs or vocational training****Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the “date to be completed” field, it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

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**Data Element 25: Budget and financial management****Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the “date to be completed” field, it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

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**Data Element 26: Housing education and home management training****Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity. CB does not have a technical understanding of why services weren’t reported.

The state has the ability for the worker to create an IL services screen in eWISACWIS. This screen allows the worker to provide information on IL services, supports, and needs. These screens can also be used to refer a youth to transition resource agencies (TRA).

For NYTD, the IL module and screen collect and collect and report NYTD data. In the IL module, there is a tab called IL services where case workers and TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported.

THE IL TD screen. Workers can also identify goals that map to NYTD service categories. They also entered a field “date to be completed.” Currently, eWiSACWIS maps any goal with a date to be completed by NTYD; however, it is unclear if the services provided to achieve that goal and if that goal was actually completed.

An assumption in the system is that the service was completed, but this does not support that an actual service was provided and completed.

In addition to the IL services screen, the state also reports IL services for this category on the IL TD screen. When a case worker or TRA worker enters a goal in this category, they also enter a goal by which the date is completed.

**Technical Issue:** According to the screen explained on the ILTD tab, where the IL data is entered on the eWiSACWIS screen, [elements 22, 23, 26, 27, 29, and 32](#) are populated based on the entry of goals related to different services. Those goals can be numbered, which is why the fields used in the OR clause indicate Goal numbers.

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### **Data Element 27: Health education and risk prevention**

#### **Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity. CB does not have a technical understanding of why services weren’t reported.

The state has the ability for the worker to create an IL services screen in eWiSACWIS. This screen allows the worker to provide information on IL services, supports, and needs. These screens can also be used to refer a youth to transition resource agencies (TRA).

For NYTD, the IL module and screen collect and collect and report NYTD data. In the IL module, there is a tab called IL services where case workers and TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported.

THE IL TD screen. Workers can also identify goals that map to NYTD service categories. They also entered a field “date to be completed.” Currently, eWiSACWIS maps any goal with a date to be completed by NTYD; however, it is unclear if the services provided to achieve that goal and if that goal was actually completed.

The system assumes that the service was completed, but this does not support that an actual service was provided and completed.

In addition to the IL services screen, the state also reports IL services for this category on the IL TD screen. When a case worker or TRA worker enters a goal in this category, they also enter a goal by which the date is completed.

**Technical Issue:** According to the screen explained on the ILTD tab, where the IL data is entered on the eWiSACWIS screen, [elements 22, 23, 26, 27, 29, and 32](#) are populated based on the entry of goals related to different services. Those goals can be numbered, which is why the fields used in the OR clause indicate Goal numbers.

- DT\_TOBE\_CMPLTTD\_HLTH\_GOAL1 (Date to be completed -Health – Goal 1)
- DT\_TOBE\_CMPLTTD\_HLTH\_GOAL2 (Date to be completed -Health – Goal 2)

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### Data Element 28: Family support and healthy marriage education

**Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the “date to be completed” field, it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

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### Data Element 29: Mentoring

**Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity. CB does not have a technical understanding of why services weren’t reported.

The state has the ability for the worker to create an IL services screen in eWiSACWIS. This screen allows the worker to provide information on IL services, supports, and needs. These screens can also be used to refer a youth to transition resource agencies (TRA).



For NYTD, the IL module and screen collect and collect and report NYTD data. In the IL module, there is a tab called IL services where case workers and TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported.

THE IL TD screen. Workers can also identify goals that map to NYTD service categories. They also entered a field “date to be completed.” Currently, eWiSACWIS maps any goal with a date to be completed by NYTD; however, it is unclear if the services provided to achieve that goal and if that goal was actually completed.

The system assumes that the service was completed, but this does not support that an actual service was provided and completed.

In addition to the IL services screen, the state also reports IL services for this category on the IL TD screen. When a case worker or TRA worker enters a goal in this category, they also enter a goal by which the date is completed.

**Technical Issue:** According to the screen explained on the ILTD tab, where the IL data is entered on the eWiSACWIS screen, [elements 22, 23, 26, 27, 29, and 32](#) are populated based on the entry of goals related to different services. Those goals can be numbered, which is why the fields used in the OR clause indicate Goal numbers.

- DT\_TOBE\_CMPLTD\_MNTR\_GOAL1 (Date to be completed – Mentor – Goal 1)

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### Data Element 30: Supervised independent living

**Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the “date to be completed” field, it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

Case Record Review – Case Record #2, we found underreported services. The caseworker listed that the youth was moved into their own apartment at Well Point Supervised Independent Living on 3/2/2023.

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**Data Element 31: Room and board financial assistance****Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the “date to be completed” field, it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

**Elements 31 – 33:** eWISACWIS does not have the financial capability to track financial assistance.

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**Data Element 32: Education financial assistance****Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity. CB does not have a technical understanding of why services weren’t reported.

The state has the ability for the worker to create an IL services screen in eWISACWIS. This screen allows the worker to provide information on IL services, supports, and needs. These screens can also be used to refer a youth to transition resource agencies (TRA).

For NYTD, the IL module and screen collect and collect and report NYTD data. In the IL module, there is a tab called IL services where case workers and TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported.

THE IL TD screen. Workers can also identify goals that map to NYTD service categories. They also entered a field “date to be completed.” Currently, eWISACWIS maps any goal with a date to be completed by NYTD; however, it is unclear if the services provided to achieve that goal and if that goal was actually completed.

An assumption in the system is that the service was completed, but this does not support that an actual service was provided and completed.

In addition to the IL services screen, the state also reports IL services for this category on the IL TD screen. When a case worker or TRA worker enters a goal in this category, they also enter a goal by which the date is completed.

**Technical Issue:** According to the screen explained on the ILTD tab, where the IL data is entered on the eWiSACWIS screen, [elements 22, 23, 26, 27, 29, and 32](#) are populated based on the entry of goals related to different services. Those goals can be numbered, which is why the fields used in the OR clause indicate Goal numbers.

- DT\_TOBE\_CMPLTD\_EDCTN\_GOAL3 (Date to be completed – Education – Goal 3)

**Elements 31 – 33** eWiSACWIS does not have the financial capability to track financial assistance.

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### **Data Element 33: Other financial assistance**

**Rating: 2**

**Findings:** There is no consistency in reporting data, leading to a lack of data quality and integrity.

For NYTD, the “IL Service” screen collects and reports NYTD data. On the screen, the caseworkers and/or TRA staff who provide IL services enter IL services provided; this includes a start date, end date, and type of services being reported (categories mirror the 12 service categories in NYTD).

For this NYTD service data element, the ILTD screen also collects and reports data to NYTD. If a caseworker and/or TRA staff identify a goal and enter a date in the field of “date to be completed,” it will be reported to NYTD as a service (if the date falls into the reporting period). However, it is unclear if indicating a goal means that a service was provided that should be reported to NYTD.

**Elements 31 – 33** eWiSACWIS does not have the financial capability to track financial assistance.

Case Record Review – Case Record #3, #16, and #21 we found underreported services that the state should have reported.

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### **Data Element 34: Outcome reporting status**

**Rating: 3**

**Findings:**

**Data Quality Issue:** When the youth/ young adult cannot be surveyed, the UWSC emails the primary worker to enter into eWiSACWIS the reason for non-participation. Overall, the UWSC provides helpful information on documenting the reason for non-participation. However, not all

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information provided addresses all the outcomes reporting status in a way to ensure consistency across the reasons. We note that UWSC is responsible for the outreach, engagement, and invitation to the youth/ young adults, but it is the caseworker/ TRA/ other DCF staff who determines a youth/ young adult reason for not participating in the survey.

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#### **Data Element 35: Date of outcome data collection**

**Rating: 4**

**Findings:**

**Findings:** Data collection, mapping, reporting, and data quality for this element are sufficient.

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#### **Data Element 36: Foster care status—outcomes**

**Rating: 2**

**Findings:**

**Technical Issue:** Based on the case record review, youth in the baseline and foster care are reported as “no” to foster care in **element 36**. The state should report foster care status on the day the young person takes (or is determined not to take) the survey.

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#### **Data Element 37: Current full-time employment**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “decline” as an available choice for the young people who take the survey.

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#### **Data Element 38: Current part-time employment**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “decline” as an available choice for the young people who take the survey. The state has created a skip pattern on the online survey for **element 37** and **element 38** that needs to be corrected. Currently, if the young person answers “yes” to **element 37**, the question related to part-time employment **element 38** is skipped. The state must ask the part-time employment question regardless of how the young person answers the full-time employment question.

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**Data Element 39: Employment-related skills**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 40: Social Security**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

Case Record Review, Case Record #11 - CB found this question was not on the survey instrument.

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**Data Element 41: Educational aid**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 42: Public financial assistance**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

These questions only apply at follow-up (age 19 and 21) for young people not in foster care. We found reported values at age 17 for **elements 42-44** during the case record review.

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**Data Element 43: Public food assistance****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

These questions only apply at follow-up (age 19 and 21) for young people not in foster care. We found reported values at age 17 for **elements 42-44** during the case record review.

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**Data Element 44: Public housing assistance****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

These questions only apply at follow-up (age 19 and 21) for young people not in foster care. We found reported values at age 17 for **elements 42-44** during the case record review.

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**Data Element 45: Other financial support****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 46: Highest educational certification received****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey. The wording of the survey question and responses must be the same as the regulation, including parenthetical examples.

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**Data Element 47: Current enrollment and attendance**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 48: Connection to adult**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 49: Homelessness**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 50: Substance abuse referral**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 51: Incarceration**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 52: Children**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 53: Marriage at child's birth**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey. The wording of the survey question must be the same as the regulation.

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**Data Element 54: Medicaid**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 55: Other health insurance coverage**

**Rating: 2**

**Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey.

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**Data Element 56: Health insurance type: Medical****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “decline” as an available choice for the young people who take the survey. **Element 56** should only be asked to the young person if they answer “yes” to **element 55**.

In the case record review, reviewers found examples where the state was “correcting” a youth’s/ young adult’s response to this element/question to make it logically consistent.

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**Data Element 57: Health insurance type: Mental health****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey. If a young person answers “yes” to **element 55** and **element 56**, then the state must ask **element 57**.

In the case record review, reviewers found examples where the state was “correcting” a youth’s/ young adult’s response to this element/question to make it logically consistent.

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**Data Element 58: Health insurance type: Prescription drugs****Rating: 2****Findings:**

**Survey Errors:** The state must include the option “declined” as an available choice for the young people who take the survey. If a young person answers “yes” to **element 55** and **element 56**, then the state must ask **element 58**.

In the case record review, reviewers found examples where the state was “correcting” a youth’s/ young adult’s response to this element/question to make it logically consistent.

## Appendix D. NYTD Improvement Plan

### General Requirements

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#### General Requirement 1: The state reports information on all youth in the served population.

**Rating: 2**

*Findings to address:*

- 1.1** The state must establish a business practice to capture information consistently and accurately on all independent living services paid for or provided by the state. *(CB will continue to work with the state around tribal data sovereignty concerns to ensure data are properly captured).*

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#### General Requirement 2: The state reports information on all youth in the baseline population.

**Rating: 2**

*Findings to address:*

- 2.1** The state is to modify its reporting process to ensure that all youth are being captured who are in the baseline, including youth in tribal custody.
- 2.2** The state is to modify its reporting process so that the baseline population youth records in the report period file corresponding to the youth's 17th birthday and the report period file in which the youth was surveyed (see [NYTD Q&A 2.55](#)).
- 2.3** The state is to modify its reporting process to include outcomes information in the NYTD data file from youth in the baseline population who were surveyed late.

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#### General Requirement 3: The state reports information on all youth in the follow-up population.

**Rating: 3**

*Findings to address:*

- 3.1** The state is to modify its logic for [element 36](#) (foster care status) to allow this information to be reported as indicated by the Federal definition of foster care.
- 3.2** The state should review barriers to utilizing the Cohort Management report to identify young adults in the follow-up population.
- 3.3** The state should review its business process to collect location information, engage, and reach out to youth in the follow-up population to take the survey, including effectively sharing information between DCF and UWSC.

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**General Requirement 4: The state implements an appropriate survey methodology to collect youth outcome data.**

**Rating: 2**

*Findings to address:*

- 4.1** The state needs to make corrections for the 17, 19, and 21-year-old surveys.
- For each of the NYTD questions, the state must include the option “decline” as an available choice for the young people who take the survey.
  - The state should add skip logic or prompts to direct the youth to respond appropriately to the health insurance coverage questions ([elements 56-58](#)).
- 4.2** The state will need to develop a process to communicate to UWSC the foster care status of young adults aged 19 and 21 in order to administer the appropriate questions ([elements 42-44](#)).
- The state should work with young people to develop language around consent and develop any prompts around the survey questions.
- 4.3** We encourage the state to build on its survey methodology and consider the following recommendations:
- Fully develop a policy for [element 34](#) (outcomes reporting status) to ensure consistent reporting.
  - Determine if UWSC is more appropriate to determine participation.

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**General Requirement 6: The state reports NYTD data files following ACF’s specifications.**

**Rating: 2**

*Findings to address:*

- 6.1** The state must update its extraction code to ensure only data applicable to the reporting population of the youth.
- 6.2** The state needs to correct the code to prevent changing or “defaulting” to specific values to be in compliance with federal specifications without individual review.

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**General Requirement 7: The state conducts quality assurance to ensure NYTD information can be analyzed and used.**

**Rating: 2**

*Findings to address:*

- 7.1** The state must develop a quality assurance process to ensure that NYTD data are accurate, complete, timely, and consistent in definition and usage across the agency. Specifically, the state is to:

- Develop a process to periodically examine the accuracy or completeness of data on youth served by the independent living program.
- Address logical inconsistencies in survey responses by consulting directly with the youth rather than automatically changing or “correcting” a youth’s responses (see [NYTD Q&A #3.25](#)).

**7.2** The state is strongly encouraged to develop and plan to integrate NYTD data into its CQI framework to develop performance measures for its independent living program. To do so, the state should review the Children’s Bureau recommendations included in the General Requirement #7 findings above and engage young people in developing and implementing any plans.

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## Data Elements

### Data Element 4: Date of Birth

**Rating: 3**

*Findings to address:*

**4.1** The state is to add supervisory controls to ensure that information on a youth’s information is recorded correctly.

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### Data Element 6: Race: American Indian or Alaska Native

**Rating: 2**

*Findings to address:*

**6.1** The state must modify its system to collect information on youths’ race and tribal membership information separately.

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### Data Element 11: Race: Unknown

**Rating: 2**

*Findings to address:*

**11.1** The program code must be updated to enable to allow “race: unknown” (“yes” for [element 11](#)) to be selected in combination with another race category ([elements 6-10](#)) when at least one race of a multiracial youth is unknown.

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### Data Element 14: Foster Care Status Services

**Rating: 2**

*Findings to address:*

**14.1** The state must accurately report the foster care status of youth in the served population. Of note, youth under the age of 18 who are in a supervised independent living setting are not considered to be in foster care. In addition, while the state has elected to extend foster care

under the federal option, only youth receiving a Title IV-E foster care maintenance payment should be reported as “in foster care” for youth over 18.

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### Data Element 15: Local Agency

**Rating: 2**

*Findings to address:*

- 15.1** The state must report the local agency’s information to NYTD:
- For youth in foster care, the state reports the five-digit FIPS code of the county or equivalent unit jurisdiction(s) that has primary responsibility for placement and care during the reporting period.
  - For youth not in foster care, the state reports the five-digit FIPS code of the county or equivalent unit jurisdiction(s) that has primary responsibility for providing services during the reporting period. If the youth was served by two jurisdictions in the same report period, the state reports the FIPS code of the county/jurisdiction that most recently provided services to the youth.
  - For a youth in foster care who leaves placement and care and receives services subsequently from another jurisdiction in the same report period, the state reports the FIPS code of the county/jurisdiction that most recently provided services to the youth, regardless of whether that agency had placement and care responsibility of the youth ([NYTD Q&A #2.62](#)).
- 15.2** The state must report the “sending” state’s local agency code for youth placed and served in Illinois from another state via the Interstate Compact on the Placement of Children (ICPC).

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### Data Element 16: Federally Recognized Tribe

**Rating: 2**

*Findings to address:*

- 16.1** The state must modify its system to collect information on youths’ race and tribal membership information separately.
- 16.2** The state must report “blank” when verification of tribal membership is pending.

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### Data Element 17: Adjudicated Delinquent

**Rating: 3**

*Findings to address:*

- 17.1** The state is to add supervisory controls to ensure that information on a youth’s delinquency is entered/updated in a timely manner.

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**Data Element 18: Educational Level****Rating: 2***Findings to address:*

- 18.1** The state must correct the technical error that defaults the education level to “11” when the information is blank.
- 18.2** The state is to establish supervisory controls to ensure that information on a youth’s education record is entered/updated in a timely manner.

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**Data Element 19: Special Education****Rating: 2***Findings to address:*

- 19.1** The state system must be modified to track whether the youth received special education during the reporting period in which the youth received services.
- 19.2** The state is to establish supervisory controls to ensure that special education information is entered/updated timely.

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**Data Element 20: Independent Living Needs Assessment****Rating: 2***Findings to address:*

- 20.1** The state must correct the technical error to accurately report only IL Needs Assessments conducted during the reporting period in which they are delivered.

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**Data Element 21: Academic support****Rating: 2***Findings to address:*

- 21.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 22: Post-secondary educational support****Rating: 2***Findings to address:*

- 22.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 23: Career preparation****Rating: 2***Findings to address:*

- 23.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 24: Employment programs or vocational training****Rating: 2***Findings to address:*

- 24.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 25: Budget and financial management****Rating: 2***Findings to address:*

- 25.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 26: Housing education and home management training****Rating: 2***Findings to address:*

- 26.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 27: Health education and risk prevention****Rating: 2***Findings to address:*

- 27.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 28: Family support and healthy marriage education****Rating: 2***Findings to address:*

- 28.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 29: Mentoring****Rating: 2***Findings to address:*

- 29.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 30: Supervised independent living****Rating: 2***Findings to address:*

- 30.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 31: Room and board financial assistance****Rating: 2***Findings to address:*

- 31.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 32: Education financial assistance****Rating: 2***Findings to address:*

- 32.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).



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**Data Element 33: Other financial assistance****Rating: 2***Findings to address:*

- 33.1** The state must revise its business process for collecting information on IL services to ensure that service information is consistently captured regarding activities and supports paid for or provided by the state (see General Requirement #1).

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**Data Element 34: Outcome reporting status****Rating: 3***Findings to address:*

- 34.1** The state should fully develop a quality assurance process to ensure the participation status or reason for non-participation is consistently and accurately reported in **element 34**.

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**Data Element 36: Foster care status—outcomes****Rating: 2***Findings to address:*

- 36.1** The state’s program code must be updated to report the federal definition of foster care (45 CFR § 1355.20) for young adults over the age of 18, according to NYTD.

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**Data Element 37: Current full-time employment****Rating: 2***Findings to address:*

- 37.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 38: Current part-time employment****Rating: 2***Findings to address:*

- 38.1** The state must revise the survey instrument to include “declined” as a response option.
- 38.2** The state must delete the skip pattern for **elements 37 and 38**.

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**Data Element 39: Employment-related skills****Rating: 2***Findings to address:*

- 39.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 40: Social Security****Rating: 2***Findings to address:*

**40.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 41: Educational aid****Rating: 2***Findings to address:*

**41.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 42: Public financial assistance****Rating: 2***Findings to address:*

**42.1** The state must revise the survey instrument to include “declined” as a response option.

**42.2** The state must adjust the survey to only apply at follow-up (age 19 and 21) for young people not in foster care.

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**Data Element 43: Public food assistance****Rating: 2***Findings to address:*

**43.1** The state must revise the survey instrument to include “declined” as a response option.

**43.2** The state must adjust the survey to only apply at follow-up (age 19 and 21) for young people not in foster care.

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**Data Element 44: Public housing assistance****Rating: 2***Findings to address:*

**44.1** The state must revise the survey instrument to include “declined” as a response option.

**44.2** The state must adjust the survey to only apply at follow-up (age 19 and 21) for young people not in foster care.

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**Data Element 45: Other financial support****Rating: 2***Findings to address:*

**45.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 46: Highest educational certification received****Rating: 2***Findings to address:*

**46.1** The state must revise the survey instrument to include “declined” as a response option.

**46.2** The state must revise the response options to reflect the exact wording or the regulation.

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**Data Element 47: Current enrollment and attendance****Rating: 2***Findings to address:*

**47.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 48: Connection to adult****Rating: 2***Findings to address:*

**48.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 49: Homelessness****Rating: 2***Findings to address:*

**49.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 50: Substance abuse referral****Rating: 2***Findings to address:*

**50.1** The state must revise the survey instrument to include “declined” as a response option.

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**Data Element 51: Incarceration****Rating: 2***Findings to address:*

**51.1** The state must revise the survey instrument to include “declined” as a response option.

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### Data Element 52: Children

#### Rating: 2

#### *Findings to address:*

**52.1** The state must revise the survey instrument to include “declined” as a response option.

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### Data Element 53: Marriage at child's birth

#### Rating: 2

#### *Findings to address:*

**53.1** The state must revise the survey instrument to include “declined” as a response option.

**53.2** The state must revise the response options to reflect the exact wording or the regulation.

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### Data Element 54: Medicaid

#### Rating: 2

#### *Findings to address:*

**54.1** The state must revise the survey instrument to include “declined” as a response option.

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### Data Element 55: Other health insurance coverage

#### Rating: 2

#### *Findings to address:*

**55.1** The state must revise the survey instrument to include “declined” as a response option.

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### Data Element 56: Health insurance type: Medical

#### Rating: 2

#### *Findings to address:*

**56.1** The state must revise the survey instrument to include “declined” as a response option.

**56.2** The state should apply skip logic so **element 56** should only be asked to the young person if they answer “yes” to **element 55**.

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### Data Element 57: Health insurance type: Mental health

#### Rating: 2

#### *Findings to address:*

**57.1** The state must revise the survey instrument to include “declined” as a response option.

**57.2** The state should apply skip logic so that if a young person answers “yes” to **element 55** and **element 56**, then the state must ask **element 57**.

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**Data Element 58: Health insurance type: Prescription drugs**

**Rating: 2**

*Findings to address:*

- 58.1** The state must revise the survey instrument to include “declined” as a response option.
- 58.2** The state should apply skip logic so that if a young person answers “yes” to **element 55** and **element 56**, then the state must ask **element 57**.