



# Alabama

---

NYTD Review – Final Report

Issued: January 16, 2018



## Table of Contents

---

<b>1</b>	<b>Introduction .....</b>	<b>2</b>
1.1	Background .....	2
1.2	Overview of the NYTD Review.....	2
1.3	Requirements Subject to Review and Rating Factors.....	4
<b>2</b>	<b>Findings.....</b>	<b>7</b>
2.1	Overview of the Onsite Phase.....	7
2.2	Overview of Findings.....	7
2.2.1	Data Collection on Youth Demographics .....	8
2.2.2	Data Collection on Independent Living Services.....	10
2.2.3	Data Collection on Youth Outcomes.....	13
2.2.4	Sampling and File Reporting .....	18
2.2.5	Data Quality, Analysis and Use .....	18
<b>3</b>	<b>Conclusion and Next Steps.....</b>	<b>20</b>
3.1	Conclusion.....	20
3.2	Improvement Plan .....	20
<b>Appendix A</b>	<b>Test Case Findings .....</b>	<b>22</b>
<b>Appendix B</b>	<b>Case Review Findings .....</b>	<b>24</b>
<b>Appendix C</b>	<b>Final Ratings and Findings – General Requirements and Data Elements.....</b>	<b>29</b>
<b>Appendix D</b>	<b>Improvement Plan.....</b>	<b>44</b>

---

## List of Figures

Figure 1	Overview of the NYTD Review Phases .....	3
Figure 2	General Requirements .....	4
Figure 3	Rating Factors .....	5
Figure 4	Summary Ratings for General Requirements and Data Elements .....	7
Figure 5	Comparison of Independent Living Services Provided in FY 16.....	11
Figure 6	Summary of Baseline Survey Effort to Date.....	15
Figure 7	Summary of Follow-Up Survey Effort to Date.....	16
Figure 8	Comparison of Cohort 1 Youth Outcomes at Ages 17, 19 and 21.....	16
Figure 9	Comparison of Cohort 2 Youth Outcomes at Ages 17 and 19.....	17
Figure 10	Comparison of Cohort 3 Youth Outcomes at Age 17.....	17

# 1. Introduction

---

## 1.1 Background

Public Law 106-169 established the John H. Chafee Foster Care Independence Program (CFCIP) at section 477 of the Social Security Act, providing states with flexible funding to carry out programs that assist youth in making the transition from foster care to self-sufficiency. 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. The National Youth in Transition Database (NYTD) was implemented 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 independent living services they receive that are paid for or provided by the state agency that administers the CFCIP. Second, states collect outcomes information on youth in foster care at age 17 whom the state will follow over time and collect additional outcome information at ages 19 and 21. The collected information will allow ACF to track which independent living 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. In addition, because a common identifier must be used for youth reported to both NYTD and the [Adoption and Foster Care Analysis and Reporting System \(AFCARS\)](#), ACF also will be able to analyze the information related to a youth's foster care experiences reported to AFCARS along with their service and/or outcomes information reported to NYTD.

## 1.2 Overview of the NYTD Review

In order to ensure that data are available to be used for the purposes outlined above, it is important to periodically assess the accuracy of the child welfare data submitted by states. The primary way we monitor NYTD data quality is through our 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). For this reason, we also specified in the regulation at 45 CFR 1356.85(d)(2) that we may use other monitoring tools or assessment procedures to determine whether a state is meeting all NYTD requirements.

The purpose of the NYTD Review is to evaluate comprehensively the state CFCIP agency's policies and practices related to 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 Statewide Automated Child Welfare Information System (SACWIS) or Comprehensive Child

Welfare Information System (CCWIS) that receive federal financial participation (FFP) are collecting and managing NYTD data consistent with federal requirements;

- 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 distinct phases: pre-onsite, onsite, and post-onsite. In the **pre-onsite phase**, the state and federal team conducts a series of pre-onsite planning calls together while the state prepares and submits documentation describing how it has implemented NYTD requirements. The **onsite phase** includes demonstrations of key aspects of the states’ data collection system and a review of a sample of case records. We also conduct stakeholder interviews during the review with 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, we prepare a report to document our findings, list suggested resources and supports if technical assistance needs are identified, and explain the actions the state should take to improve the quality and accuracy of data collection for NYTD as part of the **post-onsite phase**.

**Figure 1. Overview of the NYTD Review Phases**

Pre-onsite phase	Onsite phase	Post-onsite phase
Planning conference calls	Entrance and exit conference	Debrief conference call
System and survey documentation	System demonstration	Final report
Test cases	Case record review	Improvement plan
Case record review sample	Stakeholder interviews	
Requirements Workbook	CQI discussion	
<i>Duration:</i>	<i>Duration:</i>	<i>Duration:</i>
<b>16 weeks</b>	<b>4 days</b>	<b>16 weeks, plus up to 3 years to complete improvement plan</b>

### 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**. The general requirements include the populations to be reported to NYTD, the technical requirements for constructing a data file and data quality.

**Figure 2. General Requirements**

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 specifications.
7. The state conducts quality assurance to ensure NYTD information can be analyzed and used.

During a NYTD Review, each of the seven general requirements and each of 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. In order for the data to be considered quality data, it must be timely, accurate, complete and reliable. Findings and observations from each component of the review are analyzed to determine a rating factor for each general requirement and each data element (see Section 2.7 for more information).

The rating factors used to evaluate NYTD requirements and data elements are listed in Figure 3. A state must make improvements in each requirement/element identified in the final report with a rating factor of "3" or lower (e.g., the state does not fully meet the requirement). These improvements may involve making changes to the information system, extraction routine, and/or data entry in order to fully satisfy the requirement. In other cases, improved training or clarifying guidance or documentation may be recommended. A "4" rating factor (e.g., state fully meet the NYTD requirement) is not assigned until all system issues and data quality issues have been addressed in the improvement planning phase. While there is not an expectation that data are 100% accurate for every element, there is an expectation that the data be of a significant level of completeness and without inconsistency errors, and that this quality would also be maintained over a number of report periods.

Figure 3. 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> <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>	<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 exits foster care.</li> <li>• The state has reported consistently high quality data for the element over time.</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 incorrect or ambiguous instructions, definitions, data entry screens or forms for the element.</li> </ul>

Rating Factor	Definition For General Requirements	Definition For Data Elements
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> <li>• The state does not conduct quality assurance on NYTD data.</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 information for the element (i.e., there is no data field on the screens or form).</li> <li>• There is no program logic to extract information on the element.</li> </ul>
0	<p>State operating a SACWIS or CCWIS for which it received federal financial participation (FFP) found not to be collecting or managing NYTD data in its system consistent with federal requirements.</p>	<p>State operating a SACWIS or CCWIS for which it received federal financial participation (FFP) found not to be collecting or managing NYTD data in its system consistent with federal requirements.</p>

## 2. Findings

---

### 2.1 Overview of the Onsite Phase

On August 22 - 25, 2017, the Children's Bureau conducted the onsite NYTD Review visit in collaboration with Alabama's National Youth in Transition Database (NYTD) implementation team in the Department of Human Resources (DHR). The federal team consisted of representatives from the CB Central Office, CB Region 4 Office, staff from CB's NYTD Help Desk, two consultants from JBS International and three young adult reviewers.

The onsite review began with a demonstration of the state's child welfare information system, the Family, Adult and Child Tracking System or "**FACTS**." Next, the federal team completed the case record review using a 30-case sample of records reported in the 2016B file (April 1 – September 30, 2016) and 2017A file (October 1, 2016 – March 31, 2017). Finally, the federal team interviewed 35 individuals including case managers, independent living service providers, judicial partners and foster parents. In addition, we spoke to youth in foster care and youth formerly in foster care. The Children's Bureau provided test case scenarios to the state on July 7, 2017. The state was able to enter, extract and report these test data from FACTS on August 2, 2017.

### 2.2 Overview of Findings

As part of the post-onsite phase, the state's documents, data, case file review findings, and onsite notes were assessed to make the final determination of findings. This section contains a summary of the significant reporting and data quality issues we identified as part of this comprehensive assessment. Where applicable, we note the data element, test case number or case review sample number in parentheses applicable to each finding. The state should review carefully all the findings in this report as we have made changes to the findings and rating factors issued in the preliminary assessment on August 25, 2017. For additional information on specific issues for the general requirements and the data elements, please see Appendix C.

**Figure 4. Summary Ratings for General Requirements and Data Elements**

Rating	# of General Requirements with Rating (8)	# of Data Elements with Rating (58)
4	0	17
3	2	4
2	3	24
1	1	13
0	0	0
Not applicable	1	-



### 2.2.1 Data Collection on Youth Demographics (General Requirements 1, 2 and 4; Elements 4-19, 36)

NYTD collects information on youth demographics in NYTD data elements 4 – 19 and 36. These data elements provide critical information on basic characteristics of youth reported to NYTD. Many of these elements already are required to be reported 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 youth in transition. The NYTD Review identified challenges in the state’s collection and management of information on youths’ race (**elements 6-11**), foster care status (**element 36**), local agency (**element 15**), highest educational level completed (**element 18**), special education status (**element 19**), and whether the youth was adjudicated delinquent (**element 17**) or a member/eligible for membership in a federally-recognized tribe (**element 16**). During the system demonstration, the federal team identified a number of technical problems prohibiting FACTS from fully meeting the requirements to collect information on the characteristics of youth in the served population, including:

- **System logic that prevents data from being collected as required.** We learned that the data fields associated with **element 6** (Race: American Indian or Alaska Native) and **element 16** (federally-recognized tribe) are linked such that a value can be entered for element 16 only if a youth is also reported to be American Indian or Alaska Native (“yes” for element 6). While not mutually exclusive, element 6 and 16 are different elements that must be captured separately<sup>1</sup>. We also learned that while the system permits users to enter “additional races identified with” (**elements 6-11** for multiracial youth), no such information is extracted from FACTS for the NYTD report.
- **Defaulting “no” when a value for an element was missing or not known.** We noted that when the state has not determined a youth’s membership in a tribe (e.g., a worker indicates

#### Demographic Strength

The correct identification of foster care status (**element 14**) is a critical part of the NYTD data collection system and indicates who is eligible for and should participate in the survey at age 17. Foster care status is also a critical data point in utilizing the data to understanding how services are provided by the agency and other providers.

During the NYTD Review in Alabama, the state demonstrated that FACTS indicates foster care status, regardless of the placement setting. Therefore, their business process of the collection of foster care status leads to effective collection of foster care status for element 14.

---

<sup>1</sup> Like all race information, element 6 is a *self-identified* description indicative of how a person views him or herself 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.

“undetermined” in the field that collects information on a youth’s tribal membership), the state defaults “no” for [element 16](#). For baseline and follow-up youth, the state defaults “no” for the youth’s foster care status ([element 36](#)) if there is no survey data collected. For such youth, the state is to report an accurate foster care status based on the date the state determined the youth would not participate in the survey.

- **Not collecting all allowable values.** We learned that youth placed in Alabama from another state via the Interstate Compact for the Placement of Children (ICPC) are not reported with the sending state’s local agency code ([element 15](#)). FACTS must be able to capture the “sending” state’s FIPS code for this element.
- **Incorrectly mapping values.** The state is incorrectly reporting the current grade level of youth rather than the highest grade level they have completed for “education level ([element 18](#))”. The state also is incorrectly reporting youth who attend GED classes or who receive a GED as having completed “12<sup>th</sup> grade” in ([element 18](#)) instead of the highest grade level the youth completed before earning a GED. Finally, the state is incorrectly reporting all youth in college as in “post-secondary education” instead of “college”.
- **Collecting and reporting data that does not reflect the correct time period defined in the element.** We learned that the state reports for [element 17](#) whether or not a youth in foster care was adjudicated delinquent during the report period in which the youth received services. The state must report whether a served youth was ever adjudicated delinquent regardless of foster care status for element 17. We also learned that the state reports “yes” for [element 19](#) for any youth with the value “special education” ever selected from the “education performance” menu on the education screen. However, element 19 must reflect the youth’s special education status during the period in which she/he received services.
- **Using duplicative, obsolete or poorly defined response options.** We noted that there were many confusing or duplicative options used to capture information on a youth’s education level ([element 18](#)) (e.g., menu contains both “7<sup>th</sup> to 12<sup>th</sup> grade” and separate options for “grade 7”, “grade 8”, etc.) that may make it difficult for a worker to consistently select the correct grade level for a youth. We also noted that the state reports on a youth’s special education status ([element 19](#)) in the “education performance” menu on the education screen. However, “special education” is not an indicator of a youth’s relative performance in school (e.g., above average, average, below grade level, etc.) but rather an indication of the unique needs of a youth that is intended to be addressed through specialized instruction. For [element 16](#), the state requires workers to select at least one tribe for a youth who is a member or eligible for membership in a federally recognized tribe. However, the state indicated that the pick list of tribes has not been updated in over five years. We recommend that the state update this list with the most current listing of federally recognized tribes and eliminate the option of “other” from the discrete list of tribes.

In addition to these technical challenges, we observed inconsistent data entry. For example, during the case record review, we noted that 17 out of 22 records reported with education data contained inaccurate educational level information. Some of these records had not been updated in a year or longer. During the system demonstration, we learned that that caseworkers do not routinely enter information on court orders indicating adjudications for delinquency ([element 17](#)) These issues have contributed to very few youth (just eight) reported to have been reported adjudicated delinquent since 2011.

In addition to addressing the technical problems in FACTS noted above, the state also should reexamine the business processes used to collect and update demographic information about youth using FACTS. In some cases, workers may need re-training regarding how and when FACTS is to be used to enter demographic data for youth (e.g., for element 17). In other cases, the state may need to examine whether the FACTS screens contain sufficient information to assist workers in selecting the appropriate value for an element (e.g., elements 16, 18 and 19).

### **2.2.2 Data Collection on Independent Living Services**

*(General Requirement 1; Elements 20-33)*

In data elements 20 – 33, NYTD collects information on independent living (IL) services provided to youth. Given NYTD’s goal of providing data to help determine which services are related to positive outcomes for youth, complete and accurate services data are vital. In Alabama, the Department of Human Resources’ Family Services Division administers the state’s independent living program. The target population for independent living services is youth, ages 14-21, in foster care or formerly in foster care, though some youth receive services up to age 25 through contracted providers. Foster Care to Success administers the state’s Education and Training Voucher (ETV) program, awarding 202 awards in FY 15. The state has opted to extend title IV-E assistance to youth between ages 18 and 21 if they are in school, working or have a medical condition. Approximately one-third of youth opt to remain in foster care after reaching age 18. Youth who leave care after age 18 may re-enter custody. In FY 2016, 492 youth were in extended foster care.

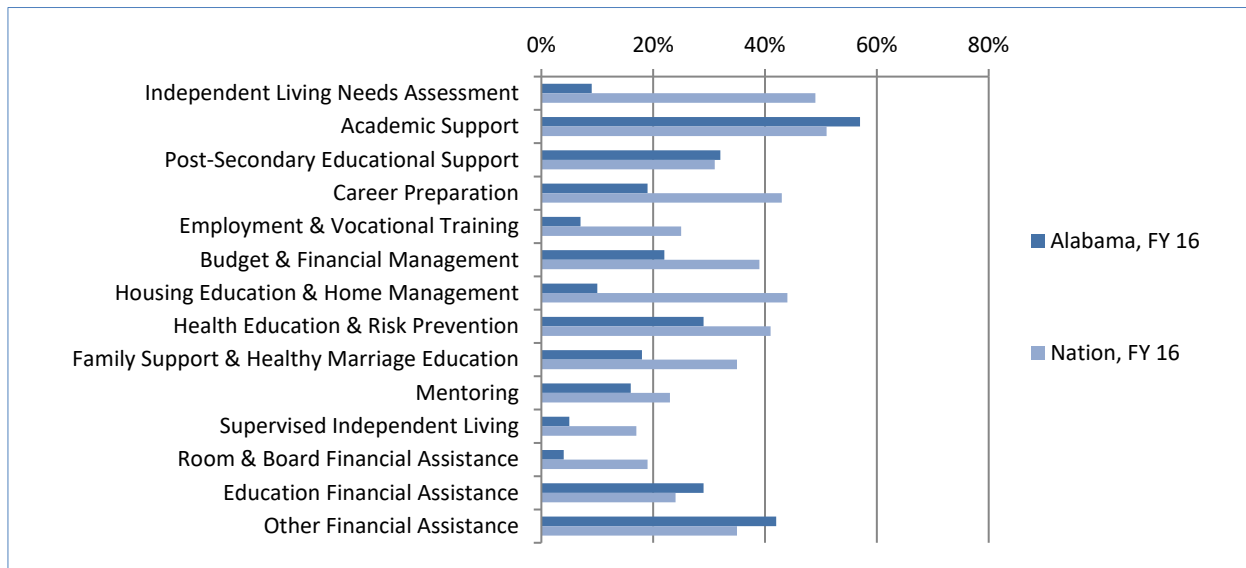
The state provides IL services through a network of providers including:

- **Children’s Aid Society:** provides youth camps/conferences for foster youth; an ILP Networking conference for DHR staff and providers; and support services for Alabama foster youth ages 16-21 and former foster youth ages 18-25. It also includes supports the development and coordination of services with the DREAM Council.
- **Alabama Reach, NSORO and the National Social Worker Enrichment Programs:** provide college readiness, leadership and life-skills and employment skills through some of the state’s university based programs.
- **Alabama National Guard** provides assistance to youth approaching the age of emancipation by providing recruiter/client counseling and career testing (i.e. Armed Services Vocational Aptitude Battery).

- **Kids 2 Love:** provides a manufacturing certification program, operates a camp for youth in foster care and is developing a statewide mentorship initiative to provide one-on-one support between foster youth in need of individualized support and community volunteers.

County staff are responsible for entering information into FACTS on services paid for by the agency and services provided directly to young people by agency staff or foster parents.

**Figure 5. Comparison of Independent Living Services Provided in FY 16**



During the system demonstration, we identified a number of data collection challenges that prevent the state from collecting accurate, reliable and complete information on the services delivered to youth in Alabama. In particular, we noted the following:

- **Descriptions of independent living services on FACTS “sessions” screens were vaguely defined.** We noted that a number of the service categories captured in element 20-33 contained labels that were vague or duplicative (e.g., multiple service categories contained the selection “problem solving” and “Teen Conference”) and so we could not determine whether such activities are appropriately categorized under an element.
- **Descriptions of independent living services on FACTS “sessions” screens were inconsistent with the definition in regulation.** We also found that the state categorizes some activities under the incorrect independent living service category defined in the NYTD regulation. For example, the state reports for [element 28](#) (family support and healthy marriage education) services that relate to a youth’s financial capabilities (e.g., money management, etc.) or basic life skills (e.g., “food preparation”, “health”) rather than a youth’s receipt of family support/healthy marriage education.
- **Information on services provided directly to youth are not reported.** We learned that while most information on independent living services is recorded in the “sessions” screen of the ILP

module, none of this information is reported to NYTD unless there is an associated payment found in the service log.

- **Information on payments made directly to youth are not reported.** Payments made directly to youth (e.g., incentives for grades or for attending IL classes also referred to as “demand payments” in FACTS) also are not reported to NYTD.
- **Information on services provided to youth over age 21 are not reported.** During the system demonstration, we learned that state limits its NYTD data reporting to youth who receive services between ages 14 and 21 even though the state provides some services through its contracted providers up to age 25.
- **Independent living services provided to youth who have left foster care.** During the system demonstration, we learned that the state lacks a business process for collecting and managing information on youth in the served population who are no longer in DHR custody, including those who have been adopted but who still receive independent living services.
- **Information on ETVs provided to youth.** The state indicated that case-level data on ETVs are not entered into FACTS by the state’s ETV vendor. As a result, the state does not report ETVs under element 32 as required. Further, because the state limits reporting on independent living services to youth between ages 14 and 21, the state would have been unable to report youth eligible to receive ETV up to age 23.

In addition to these technical data collection challenges, during the case record review we observed a number of records (3, 7, 9-11, 14, 16, 17, 19 and 20) in which services were reported to NYTD but in which reviewers could not identify whether any activities or supports that matched the reported service category were provided to the youth. In five other cases (1, 3, 9, 11 and 14) we found evidence of services provided to youth in the case record that were not reported to NYTD. **In some cases, these services went unreported because they were not recorded timely in FACTS and so were not reported in the NYTD data file that corresponded to the period in which these services were delivered.**

For all these reasons, we cannot validate that the state’s data collection practices are reliably providing accurate and complete information on the services provided to youth. As a result, General Requirement #1 is rated a “1.” Similarly, the highest possible rating we can provide for the independent living service data **elements 20-33** is also “1.” The data collection challenges summarized above impede the state’s ability to monitor the performance of the independent living program to support transitions to adulthood for young people. Based on these findings, the state is to re-evaluate its approach to collecting information on the served population to monitor the delivery of services based on appropriate independent living needs assessments.

### ***Feedback from Stakeholders Regarding the Independent Living Program***

During the NYTD Review, the state of Alabama coordinated 35 interviews with stakeholders involved in the provision of independent living services. While most stakeholders were not familiar with the NYTD reporting system, they reported providing services to youth to assist them in the transition to independence and customizing those services to the distinct needs of the individual youth. Caseworkers

were knowledgeable about the procedures for conducting the Independent Living Assessment. Caseworkers who participated in the stakeholder interviews also reported receiving training on NYTD. Stakeholders and caseworkers were well aware of the programs available in the state, including Children's Aid Society programming (the DREAM Councils), Alabama Reach, NSORO and the National Social Worker Enrichment Programs. This set of programs, funded and coordinated by the central office, were cited by multiple stakeholders as opportunities they encourage their youth to participate in due to their value.

Stakeholders did note that there are often gaps in services for youth. Youth living in rural areas, with special needs, or in congregate care might not receive services as comprehensive as other youth in transition. Stakeholders also noted that capacity in certain programs can be a barrier (e.g., a program can only serve 15 youth).

Youth, during their focus group, identified and noted numerous services they received and felt the services were helpful in their transition. Many also mentioned the programs funded by the central office (Children's Aid Society programming [the DREAM Councils], Alabama Reach, NSORO and the National Social Worker Enrichment Programs); many of the youth had applied for and/or participated in the programs noted. Since many of the youth in the focus group were part of the DREAM Councils, they elaborated on the benefits of participating in them. Youth felt that the DREAM Councils are a great way for youth to speak out and be heard. The DREAM Council Ambassadors felt that the Department was engaged in hearing the feedback and making changes to the foster care system based on the concerns identified. Youth felt that a critical component of the DREAM Councils is the modeling of their personal success, overcoming barriers, and achievement, for other youth. Youth in the focus group did remember taking the NYTD Survey and stated that incentives are important to encouraging youth to participate (not just the NYTD survey but in other activities also); however, they stated that knowing the information was going to be used to improve the system was more important than the money.

Finally, it was noted by several stakeholders that the commitment of state staff to improve the services and supports to youth was apparent in the state office. A range of providers stated that they knew who at the state office they could contact with any concerns about a youth or the services they were receiving and that issues would be investigated and resolved quickly.

### **2.2.3 Data Collection on Youth Outcomes**

*(General Requirement 2 - 5; Elements 34, 35 and 37-58)*

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 method for administering the survey. 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 Alabama's

process for administering the baseline and follow-up survey, including its efforts to locate and engage youth in this outcomes data collection effort.

### ***General Information on the State's Survey Effort***

County agency staff are primarily responsible for locating and inviting youth to take the NYTD survey, but state staff support them by providing notifications regarding which youth to survey and by assisting with locating youth who have left foster care. Youth can receive a \$50 check as an incentive for participating in the NYTD survey (however, we noted that 10 of 11 survey participants in the case record review did not appear to have received this payment). While most youth take the survey online by themselves, some caseworkers assist the youth in completing the survey (on paper) for later entry into the website. In order to take the NYTD survey online, youth must provide their name, date of birth and last four digits of their Social Security Number. If any of the provided information does not match what is stored in FACTS for the youth, the website displays an error message explaining that the survey cannot be accessed and instructs the youth to “contact your worker” for assistance. To assist with navigating such barriers, we encourage the state to consider other methods for authenticating survey participants and to provide a common point of contact (toll-free phone number or email address) for all youth who encounter difficulties taking the NYTD survey.

We noted that county staff also are responsible for collecting and updating contact information “throughout the life of a case” (e.g., through monthly face-to-face contacts, home visits, meeting and at case closing) that can be used to locate youth after they exit care. These staff are required to input contact information and to document their efforts to locate youth in FACTS. The state’s survey instruments ask for contact information for two supportive adults. However, we learned in the case record review that none of this contact information is actually stored in FACTS and so is not accessible to workers.

While the state’s survey instrument contains basic information about its purpose, this language appears to be targeted toward caseworkers as opposed to the youth who take the survey. We encourage the state to consult with its youth advisory council to develop a youth-friendly introduction to the survey that explains the purpose, goals and how the data will be used and protected as part of an informed consent protocol. Based on our review and discussion about the state’s NYTD survey instrument, we identified the following challenges and concerns:

- The state is using the incorrect survey questions to collect outcomes data from baseline youth regarding their lifetime experiences with homelessness (element 49), substance abuse referrals (element 50), incarceration (element 51) and children (element 52);
- The state is incorrectly asking the baseline youth the survey questions regarding their use of public assistance (elements 42-44);
- The state web-based survey contains prompts to assist the youth in understanding the NYTD survey questions and response options. However, we observed no standard convention used for this purpose (e.g., sometimes the prompt only clarified the meaning of a term used in the survey question, sometimes the prompt clarified only a portion of the response options);



- The prompts used to describe question #10 (element 37) and #11 (element 38) are misleading and may result in the youth collecting inaccurate information on a youth’s employment (see related findings in elements 37 and 38 below);
- The state’s paper survey does not contain the same prompts or instructions as the web-based survey. There are also other importance differences between the two instruments. For example, the paper survey makes reference to youths’ “risky behaviors” when asking about a youth’s experience with substance abuse referrals, incarceration, or children while the web-based survey describes these as “lifestyle” questions; and
- The instrument lacks skip patterns directing the youth to answer only the questions that are applicable to them for the survey questions concerning “health insurance coverage types” (elements 56-58).

While the state’s survey performance has improved over time, we observed several challenges preventing the state from collecting accurate and complete outcomes data from survey participants. These findings are discussed in the following two sections.

#### ***Data Collection on Youth Outcomes at Age 17***

The state runs a batch job nightly to identify baseline youth who turn age 17 while in DHR custody in an appropriate placement or who enter DHR custody and are placed in such a placement within 45 days after their 17<sup>th</sup> birthday. The state’s Cohort 2 baseline population has closely mirrored the size of the corresponding population of 17-year-olds in foster care reported to the Adoption and Foster Care Analysis and Reporting System (AFCARS), suggesting the state is capturing the correct universe of youth for the 17-year-old NYTD survey. However, we noted that the state reported only 60% of the number of 17-year-old records reported to AFCARS in Cohort 1 (262 of 440). During the system demonstration, we learned that the state does not currently allow youth to take the survey more than 45 days after the youth’s 17<sup>th</sup> birthday. As noted 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.

**Figure 6. Summary of Baseline Survey Effort to Date**

Cohort 1 at Age 17	Cohort 2 at Age 17	Cohort 3 at Age 17
38%	62%	78%

The state has improved its survey participation rate among baseline youth over time. After surveying just 38% of baseline youth in Cohort 1 (FY 11), the state surveyed 62% in Cohort 2 (FY 14) and 78% in Cohort 3 (FY 17).

#### ***Data Collection on Youth Outcomes at Ages 19 and 21***

The state identifies youth in the follow-up population by downloading the appropriate lists from the NYTD Portal’s “cohort management” report and identifying these youth in FACTS. Then, a report containing this list is transmitted to the ILP coordinator who then shares it the appropriate county staff.



While no automated messages or “ticklers” are used to remind workers to engage youth in the survey, the state sends emails to county directors and workers regularly until the survey is completed. However, we noted that the state does not currently allow youth to take the survey after the six-month period in which the youth turned age 19 or 21. As specified in NYTD [Q&A #1.35](#), we encourage states to continue efforts to engage youth in the follow-up NYTD survey in certain circumstances.

The state has experienced challenges managing and consistently reporting the cohort of youth in the follow-up population. For example, the state failed the outcomes universe standard in the 2013B file by omitting one follow-up youth record. In addition, the state had to update the Cohort 1 – Age 19 follow-up on 2 occasions (April 2013, June 2015) and the Cohort 1 – Age 21 follow-up population once (July 2015).

**Figure 7. Summary of Follow-Up Survey Effort to Date**

Reporting Period	Participation rate – youth in care	Participation rate – youth discharged from care
Cohort 1 at Age 19 (FY 13)	89%	59%
Cohort 1 at Age 21 (FY 15)	100%	62%
Cohort 2 at Age 19 (FY 14)	98%	76%

After struggling to survey **discharged youth** in the Cohort 1 follow-up population (59% of 19-year-olds and 62% of 21-year-olds), the state improved its performance with this group in Cohort 2 (76% of 19-year-olds). We encourage the state to build on these survey efforts by partnering with service providers and vendors who typically interact with youth (e.g., Foster Care 2 Success, mentors) to better market the NYTD survey, especially between survey waves. We also encourage the state to continue leveraging the expertise of its young adult consultants through the Children’s Aid Society, the DREAM Council and the State Ambassador Council to market the survey and to provide input on addressing the findings described above.

**Figure 8. Comparison of Cohort 1 Youth Outcomes at Ages 17, 19 and 21**

Outcomes (Cohort 1)	Age 17		Age 19		Age 21	
	Alabama	Nation	Alabama	Nation	Alabama	Nation
<b>Employed full- or part-time</b>	6%	13%	31%	34%	55%	50%
<b>Receiving public assistance</b>	N/A	N/A	0%	36%	40%	38%
<b>Finished high school or GED</b>	4%	8%	44%	54%	58%	65%
<b>Attending school</b>	96%	94%	56%	54%	27%	31%
<b>Referred for substance abuse treatment</b>	15% (lifetime)	27% (lifetime)	7% (past 2 years)	15% (past 2 years)	11% (past 2 years)	10% (past 2 years)
<b>Incarcerated</b>	20% (lifetime)	36% (lifetime)	20% (past 2 years)	22% (past 2 years)	29% (past 2 years)	22% (past 2 years)

<b>Had children</b>	6% (lifetime)	7% (lifetime)	9% (past 2 years)	12% (past 2 years)	26% (past 2 years)	27% (past 2 years)
<b>Homeless</b>	6% (lifetime)	16% (lifetime)	15% (past 2 years)	20% (past 2 years)	18% (past 2 years)	28% (past 2 years)
<b>Connection to adult</b>	98%	93%	98%	90%	88%	87%
<b>Medicaid coverage</b>	90%	83%	66%	72%	48%	66%

**Figure 9. Comparison of Cohort 2 Youth Outcomes at Ages 17 and 19**

Outcomes (Cohort 2)	Age 17		Age 19	
	Alabama	Nation	Alabama	Nation
<b>Employed full- or part-time</b>	10%	14%	39%	40%
<b>Receiving public assistance</b>	N/A	n/a	23%	31%
<b>Finished high school or GED</b>	2%	5%	48%	58%
<b>Attending school</b>	96%	93%	61%	52%
<b>Referred for substance abuse treatment</b>	19% (lifetime)	27% (lifetime)	13% (past 2 years)	14% (past 2 years)
<b>Incarcerated</b>	16% (lifetime)	32% (lifetime)	11% (past 2 years)	19% (past 2 years)
<b>Had children</b>	4% (lifetime)	5% (lifetime)	9% (past 2 years)	10% (past 2 years)
<b>Homeless</b>	4% (lifetime)	17% (lifetime)	7% (past 2 years)	20% (past 2 years)
<b>Connection to adult</b>	97%	93%	93%	89%
<b>Medicaid coverage</b>	96%	85%	84%	77%

**Figure 10. Comparison of Cohort 3 Youth Outcomes at Age 17**

Outcomes (Cohort 3)	Age 17	
	Alabama	Nation
<b>Employed full- or part-time</b>	8%	18%
<b>Receiving public assistance</b>	N/A	n/a
<b>Finished high school or GED</b>	6%	5%
<b>Attending school</b>	94%	93%
<b>Referred for substance abuse treatment</b>	18% (lifetime)	24% (lifetime)
<b>Incarcerated</b>	19% (lifetime)	31% (lifetime)
<b>Had children</b>	5% (lifetime)	5% (lifetime)
<b>Homeless</b>	9% (lifetime)	20% (lifetime)

Connection to adult	94%	93%
Medicaid coverage	98%	84%

#### **2.2.4 Sampling and File Reporting**

*(General Requirements 6 and 7)*

To date, the state has not opted to sample. As a result, General Requirement #6 is not applicable and will receive no rating. In preparation for the NYTD Review, the federal team determined that the state was unable to report all required NYTD information on youth in a single record as required by 45 CFR 1356.83(f). This finding was based on our review of the state’s extraction code which indicated that information on youth demographic (elements 14-19) and independent living services information (elements 20-33) were excluded from the records of youth in the baseline and follow-up populations who also receive independent living services. After notifying the state regarding this finding, updates were made to the state’s extraction code to ensure that services data on baseline and follow-up population were reported. However, we determined that these code changes resulted in the state incorrectly reporting values for elements 14 (foster care status – services), 15 (local agency) and 20-33 (independent living services) for non-served youth (elements 14, 15, 20-33 apply to served population youth only). During the case record review, we observed 10 records of youth reported to be in the served population but for whom no services were reported (e.g., elements 20-33 all “no” for records 4, 5, 6, 8, 12, 13, 15, 18, 21, 25 and 30).

#### **2.2.5 Data Quality, Analysis and Use**

*(General Requirement 8)*

The state is using NYTD system tools such as the NYTD Portal and the NYTD Data Review Utility (NDRU) to identify and address missing or other erroneous information on data elements that fail a NYTD data standard. However, we determined that the state is automatically changing or “correcting” a youth’s response to some survey questions if a logically inconsistent survey response is provided for this survey question instead of consulting with the youth first (see NYTD Q&A #3.25). While the state conducts some quality assurance on some case-level data (e.g., ensuring the Daniel Memorial Assessment is conducted prior to approving services, verifying education record is up-to-date for youth receiving ETV or Fostering Hope Scholarship), there is no other structured process to determine the accuracy or completeness of data on youth served by the independent living program.

The state has shared NYTD data with providers and community stakeholders, staff, tribal partners and young people in a series of trainings, consultations and presentations since 2011. NYTD data are used to identify and address some program needs and issues. For example, the state used NYTD data to inform its decision to develop and implement additional post-secondary supports for young people including the Fostering Hope Scholarship. NYTD data has also been used to address the need to update the local funds policy and the ongoing need for a state-wide mentoring program. 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 CFCIP, but paid for provided by local mentoring programs, workforce development programs, etc.) to determine which services (type/dosage) really lead to improved outcomes.
- Conducting analyses to identify different rates of response to youth by demographic variable and by administration method (e.g., caseworker administered survey versus youth's self-administered survey).
- Conducting analysis of service data by locality to determine gaps in services or service needs.
- Disseminating NYTD data beyond state staff and youth to service providers, courts, foster parents and other stakeholders.
- Tailoring the DPQI review process to focus on the appropriate review of youth in extended foster care and accurate reporting of NYTD elements for youth in the NYTD reporting populations;
- Consulting with youth to develop targeted survey questions for DPQI survey; and
- Developing performance measures using NYTD data to raise visibility of practice issues impacting transitioning youth.

We also strongly encourage the state to engage young people as stakeholders in these CQI efforts by consulting with the DREAM Council and State Ambassador Council.

## 3. Conclusion and Next Steps

---

### 3.1 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 review findings including the extent to which the state is meeting all of the NYTD requirements and is collecting and reporting 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 Alabama to assess options for system and business process improvements during the post-onsite phase through the improvement plan.

### 3.2 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 receive a rating factor of "3" or lower. 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 length of time it will take to complete the item. Within 30 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 if technical assistance is needed and available to implement the plan. All items in the improvement plan must have a rating of "4" before the plan is considered completed. Once the improvement plan is completed and approved, a letter will be sent to the state from the Children's Bureau's acknowledging completion.

Upon receipt of the state's initial improvement plan, the Children's Bureau will review the due dates to ensure the plan will be implemented in a timely manner. The electronic version of the improvement plan is used by the state and the Children's Bureau for tracking changes, progress notes, and the Children's Bureau's approval of completed action items. As changes are made to either the program code or screens, documentation noting the updates must be included with the electronic improvement plan. This may include including screen shots or revised program code that reflect the changes made to the system.

The state is to 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 next due improvement plan due date. Please note that the state is to summarize its progress implementing the NYTD improvement

plan in its Annual Progress and Services Report<sup>2</sup> (APSR) and, if applicable, the state's Advance Planning Document (APD) Update<sup>3</sup> if changes are being made to the SACWIS or CCWIS.

---

<sup>2</sup> Instructions for completing the APSR are published in a program instruction (PI) each year. See <http://www.acf.hhs.gov/programs/cb/laws-policies/policy-program-issuances> for more information or contact your regional child welfare program specialist for more information.

<sup>3</sup> Please contact your assigned Division of State Systems analyst for more information or visit <http://www.acf.hhs.gov/programs/cb/research-data-technology/state-tribal-info-systems>.

## Appendix A. Test Case Findings

---

As noted in Section 2.1, the Children’s Bureau provided test case scenarios to the state on June 10, 2016. The state was able to enter, extract and report these test data from FACTS on August 2, 2017. Findings from the test cases were discussed during the final pre-on-site phase planning call on August 14, 2017.

Test Case	Findings
1	<ul style="list-style-type: none"><li>• The state incorrectly reported “no” for <b>element 11</b> (Race-unknown) for a multiracial youth with one race unknown.</li><li>• The state incorrectly reported that the youth had completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The test case scenario indicated that 11<sup>th</sup> grade was the highest education level achieved by the youth as of the end of the report period.</li><li>• The state incorrectly reported “yes” for <b>element 21</b> (academic support). The test case scenario did not indicate that youth received this service during the report period.</li><li>• The state incorrectly reported “no” for <b>element 22</b> (post-secondary educational support). The test case scenario indicated that youth received some college advising from caseworker (e.g., college selection, SAT prep information).</li><li>• The state incorrectly reported the date of data entry (01-23-2017) for <b>element 35</b> (date of outcomes data collection) rather than the date the youth took the survey (01-20-2017).</li></ul>
2	<ul style="list-style-type: none"><li>• The state incorrectly reported “no” for <b>element 17</b> (adjudicated delinquent) for a youth who was adjudicated delinquent in 2012.</li><li>• The state incorrectly reported that the youth was in post-secondary education (“post-secondary” for <b>element 18</b>). The test case scenario indicated that the youth had completed a semester of college as of the end of the report period.</li><li>• The state incorrectly reported “yes” for <b>element 19</b> (special education) for a youth who was no longer in K-12 education and therefore not receiving special education services.</li><li>• The state incorrectly reported “yes” for <b>elements 20 and 24</b> (independent living needs assessment and employment program/vocational training). The test case scenario did not indicate that the youth received these services.</li><li>• The state incorrectly reported “no” for <b>elements 22, 23, 26, 31 and 32</b> (post-secondary educational support, career preparation, housing education and home management training, room and board financial assistance and education financial assistance). The test case scenario indicated that the youth received all these services, including ETV.</li></ul>

Test Case	Findings
3	<ul style="list-style-type: none"> <li>The state incorrectly reported “no” for <b>element 16</b> (federally recognized tribe) for a youth who was eligible for membership (but not registered) with a tribe.</li> <li>The state incorrectly reported that the youth completed 11<sup>th</sup> grade (“11” for <b>element 18</b>). The test case scenario indicated that the youth had completed 10<sup>th</sup> grade as of the end of the report period.</li> <li>The state incorrectly reported “no” for <b>element 19</b> (special education) for a youth who had an active IEP during the period under review.</li> <li>The state incorrectly left blank <b>element 34</b> (outcomes reporting status). The test case scenario indicated that the youth was unable to be located/invited to take the survey. Consequently, “unable to locate” is the correct value for element 34.</li> <li>The state incorrectly left blank <b>element 36</b> (foster care status-outcomes). The test case scenario indicated that the youth was in foster care as of the date the state determined a non-response reason. Consequently, “yes” is the correct value for element 36.</li> </ul>
4	<ul style="list-style-type: none"> <li>The state incorrectly reported “no” for element 16. Because the youth’s membership in a tribe was pending verification, “blank” is to be reported until an appropriate value can be determined for this element.</li> <li>The state incorrectly reported that the youth completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The test case scenario indicated that the youth had completed 11<sup>th</sup> grade as of the end of the report period.</li> <li>The state incorrectly reported “yes” for <b>element 24</b> (employment program or vocational training). The test case scenario did not indicate that the youth received this service.</li> <li>The state incorrectly reported “yes” for <b>element 29</b> (mentoring). While the youth has a mentor, it is not clear from scenario whether the agency paid for or provided this service. Consequently, “no” is the correct value for element 29.</li> <li>The state incorrectly reported “no” for <b>element 33</b> (other financial assistance) for a youth who received a clothing voucher paid for with Chafee funds.</li> <li>The state incorrectly reported the youth’s outcomes information (i.e., values for elements 34-58). The youth had a birthday within 45 days of the end of the 2017A period and was surveyed timely in the 2017B period. As a result, elements 34-58 should be left blank and reported in the 2017B file.</li> </ul>
5	<ul style="list-style-type: none"> <li>The state failed to report the record in the test case file. Because the youth in the test case scenario received independent living services, the record was to have been included in the test case file with valid values for <b>elements 1-33</b>.</li> </ul>



## Appendix B. Case Review Findings

As noted in Section 2, CB pulled a random sample of 30 youth records (ten 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. Alabama provided both the electronic records and paper records for these youth in support of the case review. The periods under review were April 1, 2016 – September 30, 2016 (the “2016B” report period) and October 1, 2016 – March 31, 2017 (the “2017A” report period). Of the 30 records in the sample, 22 were reviewed. The table below summarizes our findings from the case review. Please note that 11 cases in the sample (4, 5, 6, 8, 12, 13, 15, 18, 21, 25 and 30) were erroneously reported in the served population. However, the case review teams validated the accuracy of all data reported, including reviewing elements that contained data that were to have been left blank.

Case Record	Findings
1	<ul style="list-style-type: none"><li>The state incorrectly reported “no” for <b>element 20</b> (independent living needs assessment). Because the youth received the Daniel Memorial Assessment during the period under review, “yes” is the correct value for element 20.</li></ul>
2	<ul style="list-style-type: none"><li>The state incorrectly reported that the youth had completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The case file indicated that 9<sup>th</sup> grade was last grade completed by the youth during the period under review.</li></ul>
3	<ul style="list-style-type: none"><li>The state incorrectly reported that the youth had completed 9<sup>th</sup> grade (“9” for <b>element 18</b>). The case file indicated that 8<sup>th</sup> grade was last grade completed by the youth during the period under review.</li><li>The state incorrectly reported “no” for <b>elements 20, 25 and 28</b> (independent living needs assessments, budget and financial management and family support/healthy marriage education). The case record indicated that the youth had received these services during the period under review.</li><li>While the state reported “yes” for <b>element 23</b> (career preparation), we could not identify the source of this value in the FACTS screens that capture data on this element.</li></ul>
4*	<ul style="list-style-type: none"><li>The state incorrectly reported “no” for <b>element 10</b> (Race: White). The youth was multiracial, but the state failed to report the youth’s second race (White).</li><li>The state reported the FIPS code for Shelton County (01021) for <b>element 15</b> (local agency). However, the last local agency with primary responsibility for the youth was Jefferson County (01073).</li><li>The youth was in the follow-up population but was not able to be located for the survey at age 19 or 21. The case record indicated that the ILP coordinator attempted to contact the youth via social media for the age 21 survey but was not able to connect with her.</li></ul>
5*	<ul style="list-style-type: none"><li>The state incorrectly reported that the youth had completed 11<sup>th</sup> grade (“11” for <b>element 18</b>). The case file indicated that 10<sup>th</sup> grade was last grade completed by the youth during the period under review. However, the education record was last updated on 12/16/14 so it is difficult to validate the accuracy of any grade level for the youth.</li><li>Youth completed the follow-up NYTD survey at age 19.</li></ul>

Case Record	Findings
6*	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth had completed 11<sup>th</sup> grade ("11" for <b>element 18</b>). The case file indicated that 10<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The youth turned age 17 in December 2016, but entered foster care in mid January 2017 and so the state did not have sufficient lead time to administer the baseline survey ("unable to locate or invite" reported for <b>element 34</b>).</li> </ul>
7	<ul style="list-style-type: none"> <li>The case review team was unable to locate the youth's birth certificate in the case record. As a result, <b>element 4</b> (date of birth) could not be validated for accuracy.</li> <li>The state incorrectly reported that the youth had completed 9<sup>th</sup> grade ("9" for <b>element 18</b>). The case file indicated that 8<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The state reported "yes" for <b>element 25</b> (budget and financial management) but no documentation was located to validate that this service was paid for with Chafee funds during the period under review.</li> </ul>
8*	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth had completed 10<sup>th</sup> grade ("10" for <b>element 18</b>). The case file indicated that 9<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The state incorrectly reported that the youth was not receiving special education ("no" for <b>element 19</b>). The case file included case notes regarding the youth's special education assessments and Individualized Education Program (IEP) in effect during the period under review.</li> <li>The youth participated timely in the baseline survey on his 17<sup>th</sup> birthday.</li> </ul>
9	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth had completed 7<sup>th</sup> grade ("7" for <b>element 18</b>). The case file indicated that 6<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The state reported that the youth received health education and risk prevention services ("yes" for <b>element 27</b>) but no documentation was located in the case record to validate this information.</li> <li>The state incorrectly reported "no" for <b>element 32</b> (education financial assistance). The case record indicated that the state paid the youth's school registration fee during the period under review.</li> </ul>
10	<ul style="list-style-type: none"> <li>The state reported that the youth received academic support and education financial assistance ("yes" for <b>elements 21 and 32</b>, respectively) but no documentation was located in the case record to validate this information.</li> <li>The youth participated in the baseline survey timely in the same month of her 17<sup>th</sup> birthday. The survey was administered by a county worker.</li> </ul>

Case Record	Findings
<b>11</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth had completed 11<sup>th</sup> grade (“11” for <b>element 18</b>). The case file indicated that 10<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The state reported that the youth received academic support (“yes” for <b>element 21</b>) but no documentation was located in the case record to validate this information.</li> <li>The state incorrectly reported “no” for <b>element 22</b> (post-secondary educational support). The case record indicated that the state provided college counseling on several occasions during the period under review.</li> <li>Similarly, the state incorrectly reported “no” for <b>element 27</b> (health education and risk prevention). The case record indicated that the state provided sex education and education regarding healthy eating during the period under review.</li> <li>The youth participated in the baseline survey timely at age 17.</li> </ul>
<b>12*</b>	<ul style="list-style-type: none"> <li>The state reported the FIPS code for Blount County (01009) for <b>element 15</b> (local agency). However, the last local agency with primary responsibility for the youth was Jefferson County (01073).</li> <li>The state incorrectly reported that the youth had completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The case file indicated that 11<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The youth took the follow-up surveys timely at both ages 19 and 21. Both surveys were completed online by the youth.</li> </ul>
<b>13*</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth had completed 9<sup>th</sup> grade (“9” for <b>element 18</b>). The case file indicated that 8<sup>th</sup> grade was last grade completed by the youth during the period under review.</li> <li>The youth participated in the baseline survey timely at age 17 (online).</li> </ul>
<b>14</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth was in post-secondary education (“post-secondary” for <b>element 18</b>). The case file indicated that the youth had completed one year of college.</li> <li>The state incorrectly reported “no” for <b>element 20</b> (independent living needs assessment). The case record indicated that the youth received the Daniel Memorial Assessment during the period under review)</li> <li>The state also incorrectly reported “no” for <b>element 22</b> (post-secondary educational support). The case record indicated that the worker provided college counseling, spoke to the youth about ETV and eventually signed the youth up for freshman orientation for college.</li> <li>Similarly, the state incorrectly reported “no” for <b>element 25</b> (budget and financial management). The case record indicated that a worker assisted the youth in setting up a budget during the period under review.</li> <li>The state reported that the youth received academic support and career preparation (“yes” for <b>elements 21</b> and <b>23</b>) but no documentation was located in the case record to validate this information.</li> <li>The youth participated in the follow-up survey timely at age 19 and received a \$50 incentive.</li> </ul>

Case Record	Findings
<b>15*</b>	<ul style="list-style-type: none"> <li>In FACTS, the youth’s second race was listed as “multi-racial youth – other race unknown”, but the state only reported one race (Black or African American) for the youth. The correct information to report is “yes” for <b>element 8</b> (Race-Black or African American and “yes” for <b>element 11</b> (Race-unknown)</li> <li>The state incorrectly reported “no” for <b>element 17</b> (adjudicated delinquent). The case record indicated that the youth was committed to the Department of Youth Services (DYS).</li> <li>The state incorrectly reported that the youth had completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The case file indicated that the youth’s last known grade level was 7<sup>th</sup> grade.</li> <li>The youth was unable to be located or invited to participate in the follow-up survey at age 19.</li> </ul>
<b>16</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The case file indicated that the youth had completed 11<sup>th</sup> grade as of the end of the period under review.</li> <li>The state reported that the youth received academic support and education financial assistance (“yes” for <b>elements 21</b> and <b>32</b>) but no documentation was located in the case record to validate this information.</li> <li>The youth participated in the follow-up survey timely at age 19 with the assistance of a worker.</li> </ul>
<b>17</b>	<ul style="list-style-type: none"> <li>The state reported that the youth received academic support and other financial assistance (“yes” for <b>elements 21</b> and <b>33</b>) but no documentation was located in the case record to validate this information.</li> <li>The youth participated in the baseline survey timely at age 17 with the assistance of a worker during a home visit.</li> </ul>
<b>18*</b>	<ul style="list-style-type: none"> <li>The youth participated in the follow-up survey timely at age 19.</li> </ul>
<b>19</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth completed 10<sup>th</sup> grade (“10” for <b>element 18</b>). The case file indicated that the youth had completed 9<sup>th</sup> grade as of the end of the period under review.</li> <li>The state reported that the youth received family support/healthy marriage education (“yes” for <b>element 28</b>) but no documentation was located in the case record to validate this information.</li> <li>The state reported “parent declined” for <b>element 34</b> to describe the reason for the youth’s non-participation in the follow-up survey at age 19. However, the youth was placed in a group home at the time and no other documentation described the youth’s parent had declined participation in the survey on the youth’s behalf.</li> </ul>
<b>20</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth completed 9<sup>th</sup> grade (“9” for <b>element 18</b>). The case file indicated that the youth had completed 8<sup>th</sup> grade as of the end of the period under review.</li> <li>The state reported that the youth received academic support, budget and financial management, family support/healthy marriage education, mentoring, education financial assistance and other financial assistance (“yes” for <b>elements 21, 25, 28, 29, 32</b> and <b>33</b>) but no documentation was located in the case record to validate this information.</li> </ul>

Case Record	Findings
<b>21*</b>	<ul style="list-style-type: none"> <li>The state reported the FIPS code for Talladega County (01121) for <b>element 15</b> (local agency). However, the local agency with primary responsibility for the youth was Lauderdale County (01077).</li> <li>The state incorrectly reported that the youth completed 12<sup>th</sup> grade (“12” for <b>element 18</b>). The case file indicated that the highest grade level completed by the youth prior to earning a GED was 8<sup>th</sup> grade as of the end of the period under review.</li> <li>The youth declined to take the baseline survey at age 17.</li> </ul>
<b>22</b>	<ul style="list-style-type: none"> <li>The state incorrectly reported that the youth completed 8<sup>th</sup> grade (“8” for <b>element 18</b>). The case file indicated that the youth had completed 7<sup>th</sup> grade as of the end of the period under review.</li> </ul>
<b>23</b>	Case not reviewed
<b>24</b>	Case not reviewed
<b>25*</b>	Case not reviewed
<b>26</b>	Case not reviewed
<b>27</b>	Case not reviewed
<b>28</b>	Case not reviewed
<b>29</b>	Case not reviewed
<b>30*</b>	Case not reviewed

\*Indicates that the record was reported to be in the served population but no services were reported (i.e., elements 20-33 were all “no”). The case review teams validated all information in these records.

## Appendix C. Final Ratings and Findings - General Requirements and Elements

---

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

#### Rating: 1

**Findings:** County staff are responsible for entering information into FACTS on services paid for by the agency and services provided directly to young people by agency staff or foster parents. During the system demonstration and case record review, we identified six different locations in FACTS where services data can be entered or logged: the “sessions” screen of ILP module (for most services provided), the services log (for payments to vendors), the “demand payment” history (for payments to youth), the placement history (for youth in supervised independent living), ILP “provider services” screen (for services delivered by placement providers) and case narratives. However, we learned during the system demonstration and through discussions with state staff that the agency does not have a process for collecting services data on:

- Youth over age 21 who may receive services;
- Youth who are not in DHR custody, including those who have been adopted, but who still receive independent living services or supports (see test case #5 findings); and
- Youth who receive Education and Training Vouchers (ETV).

In addition, we learned that while most information on independent living services is recorded in the “sessions” screen of the ILP module, none of this information is reported to NYTD unless there is an associated payment found in the service log. Payments made directly to youth (e.g., incentives for grades or for attending IL classes also referred to as “demand payments” in FACTS) also are not reported to NYTD. Consequently, it appears that only services associated with a payment to a vendor/provider are currently captured as NYTD services data. During the case record review, we noted that some services provided by the state were not recorded timely in FACTS and so were not reported in the NYTD data file that corresponded to the period in which these services were delivered. In addition, we were unable to validate some services paid for or provided by the state due to insufficient supporting documentation or conflicting documentation in 11 of 13 records containing service information we reviewed. In particular, we noted lack of or inconsistent reporting on independent living needs assessments conducted with youth and services provided by foster parents. We also noted that services authorized for payment often lacked a description about their purpose or were paid for with funds other than those provided by the state Chafee agency (e.g., SSI). For all these reasons, we have determined that the state is unable to collect and report independent living services consistent with federal requirements. As a result, this requirement and data elements 21-33 are rated “1”.

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

#### Rating: 3

**Findings:** The state runs a batch job nightly to identify baseline youth who turn age 17 while in DHR custody in an appropriate placement or who enter DHR custody and are placed in such a placement within 45 days after their 17<sup>th</sup> birthday (youth inserted into the TNYTD\_COHORT table). The state’s Cohort 2 baseline population has closely mirrored the size of the corresponding population of 17-year-olds in foster care reported to the Adoption and Foster Care Analysis and Reporting System (AFCARS), suggesting the state is capturing the correct universe of youth for the 17-year-old NYTD survey. However, we noted that the state reported only 60% of the number of 17-year-old records reported to AFCARS in Cohort 1 (262 of 440). During the

system demonstration, we learned that the state does not currently allow youth to take the survey more than 45 days after the youth's 17<sup>th</sup> 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.

In test case #2, the state failed to report the record of a baseline population youth who did not take the survey (e.g., left elements 34-58 "blank"). Despite not taking the survey, the youth otherwise met the definition for inclusion in the baseline population and so the state must report basic demographic information about the youth (elements 1-13), the reason for a youth's non-response (element 34) and the youth's foster care status (element 36) as of the date the state determined a reason for non-response. In test case #4, the state reported survey data collected in the subsequent report period (2017B) in the prior report period's data file (2017A). Because the youth turned age 17 during the 2017A period and because the state had not surveyed the youth during the 2017A period, the youth record is to be reported in the 2017A file with "blanks" for elements 34-58 until survey data are collected and reported in the 2017B period (see [NYTD Q&A 2.55](#)).

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

#### **Rating: 3**

**Findings:** The state identifies youth in the follow-up population by downloading the appropriate lists from the NYTD Portal's "cohort management" report and identifying these youth in FACTS. Then, a report containing this list is transmitted to the ILP coordinator who then shares it the appropriate county staff. While no automated messages or "ticklers" are used to remind workers to engage youth in the survey, the state sends emails to county directors and workers regularly until the survey is completed. However, we noted that the state does not currently allow youth to take the survey after the six-month period in which the youth turned age 19 or 21. As specified in NYTD [Q&A #1.35](#), we encourage states to continue efforts to engage youth in the follow-up NYTD survey in certain circumstances.

The state has experienced challenges managing and consistently reporting the cohort of youth in the follow-up population. For example, the state failed the outcomes universe standard in the 2013B file by omitting one follow-up youth record. In addition, the state had to update the Cohort 1 – Age 19 follow-up on 2 occasions (April 2013, June 2015) and the Cohort 1 – Age 21 follow-up population once (July 2015).

### **4. The state implements an appropriate survey methodology to collect youth outcomes data. (General Requirement)**

#### **Rating: 2**

**Findings:** County agency staff are primarily responsible for locating/inviting youth to take the NYTD survey but state staff support them by providing notifications regarding which youth to survey and by assisting with locating youth who have left foster care. Youth can receive a \$50 check as an incentive for participating in the NYTD survey (however, we noted that 10 of 11 survey participants in the case record review did not appear to have received this payment). While most youth take the survey online by themselves, some caseworkers assist the youth in completing the survey (on paper) for later entry into the website. In order to take the NYTD survey online, youth must provide their name, date of birth and last four digits of their Social Security Number. If any of the provided information does not match what is stored in FACTS for the youth, the website displays an error message explaining that the survey cannot be accessed and instructs the youth to "contact your worker" for assistance. We encourage the state to consider how to remove barriers to accessing the survey for youth who, as they age, may have name changes (e.g., through marriage, adoption, transgender identity, etc.) or who may not know who their worker is or was (especially for youth who are no longer in foster care). To assist with

navigating such barriers, we encourage the state to consider other methods for authenticating survey participants and to provide a common point of contact (toll-free phone number or email address) for all youth who encounter difficulties taking the NYTD survey.

We noted that county staff also are responsible for collecting and updating contact information “throughout the life of a case” (e.g., through monthly face-to-face contacts, home visits, meeting and at case closing) that can be used to locate youth after they exit care. These staff are required to input contact information and to document their efforts to locate youth in FACTS. The state’s survey instrument asks for contact information for two supportive adults. However, we learned in the case record review that none of this contact information is actually stored in FACTS and so is not accessible to workers.

While the state’s survey instrument contains basic information about its purpose, this language appears to be targeted toward caseworkers as opposed to the youth who take the survey. We encourage the state to consult with its youth advisory council to develop a youth-friendly introduction to the survey that explains the purpose, goals and how the data will be used and protected as part of an informed consent protocol. Based on our review and discussion about the state’s NYTD survey instrument, we identified the following challenges and concerns:

- The state is using the incorrect survey questions to collect outcomes data from baseline youth regarding their lifetime experiences with homelessness (element 49), substance abuse referrals (element 50), incarceration (element 51) and children (element 52);
- The state is incorrectly asking the baseline youth the survey questions regarding their use of public assistance (elements 42-44);
- The state web-based survey contains prompts to assist the youth in understanding the NYTD survey questions and response options. However, we observed no standard convention used for this purpose (e.g., sometimes the prompt only clarified the meaning of a term used in the survey question, sometimes the prompt clarified only a portion of the response options);
- The prompts used to describe question #10 (element 37) and #11 (element 38) are misleading and may result in the youth collecting inaccurate information on a youth’s employment (see related findings in elements 37 and 38 below);
- The state’s paper survey does not contain the same prompts or instructions as the web-based survey. There are also other importance differences between the two instruments. For example, the paper survey makes reference to youths’ “risky behaviors” when asking about a youth’s experience with substance abuse referrals, incarceration, or children while the web-based survey describes these as “lifestyle” questions; and
- The instrument lacks skip patterns directing the youth to answer only the questions that are applicable to them for the survey questions concerning “health insurance coverage types” (elements 56-58).

The state has improved its survey participation rate among **baseline youth** over time. After surveying just 38% of baseline youth in Cohort 1 (FY 11), the state surveyed 62% in Cohort 2 (FY 14) and 78% in Cohort 3 (FY 17). After struggling to survey **discharged youth** in the Cohort 1 follow-up population (59% of 19-year-olds and 62% of 21-year-olds), the state improved its performance with this group in Cohort 2 (76% of 19-year-olds). We encourage the state to build on these survey efforts by partnering with service providers and vendors who typically interact with youth (e.g., Foster Care 2 Success, mentors) to better market the NYTD survey, especially between survey waves. We also encourage the state to continue leveraging the expertise of its young adult consultants through the Children’s Aid Society, the DREAM Council and the State Ambassador Council to market the survey and to provide input on addressing the findings described above.



**5. The state follows ACF's sampling procedures. (General Requirement)**

**Rating:** N/A

**Findings:** This general requirement does not apply to Alabama as the state did not opt to sample.

**6. The state reports NYTD data files following ACF's specifications. (General Requirement)**

**Rating:** 2

**Findings:** Prior to July 2017, the state had been unable to report all required information on youth in a single record as required by (45 CFR 1356.83(f)). This finding was based on our review of the state's extraction code which indicated that information on youth demographic (elements 14-19) and independent living services information (elements 20-33) were excluded from the records of youth in the baseline and follow-up populations who also receive independent living services. After notifying the state regarding this finding, updates were made to the state's extraction code to ensure that services data on baseline and follow-up population were reported. However, we determined that these code changes resulted in the state incorrectly reporting values for elements 14 (foster care status – services), 15 (local agency) and 20-33 (independent living services) for non-served youth (elements 14, 15, 20-33 apply to served population youth only). During the case record review, we observed 10 records of youth reported to be in the served population but no services were reported (e.g., elements 20-33 all “no” for records 4, 5, 6, 8, 12, 13, 15, 18, 21, 25 and 30).

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

**Rating:** 2

**Findings:** The state is using NYTD system tools such as the NYTD Portal and the NYTD Data Review Utility (NDRU) for to identify and address missing or other erroneous information on data elements that fail a NYTD data standard. However, the state automatically changes or “corrects” a youth's response to some survey questions if a logically inconsistent survey response is provided for this survey question instead of consulting with the youth first (see NYTD Q&A #3.25). While the state conducts some quality assurance on some case-level data (e.g., ensuring the Daniel Memorial Assessment is conducted prior to approving services, verifying education record is up-to-date for youth receiving ETV or Fostering Hope Scholarship), there is no other structured process to determine the accuracy or completeness of data on youth served by the independent living program.

The state has shared NYTD data with providers and community stakeholders, staff, Tribal partners and our young people in a series of trainings, consultations and presentations since 2011. NYTD data are used to identify and address some program needs and issues. For example, the state used NYTD data to inform its decision to develop and implement additional post-secondary supports for young people including the Fostering Hope Scholarship. NYTD data has also been used to address the need to update the local funds policy and the ongoing need for a state-wide mentoring program. 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 CFCIP, but paid for provided by local mentoring programs, workforce development programs, etc.) to determine which services (type/dosage) really lead to improved outcomes.
- Conducting analyses to identify different rates of response to youth by demographic variable and by administration method (e.g., caseworker administered survey versus youth's self-administered survey).

- Conducting analysis of service data by locality to determine gaps in services or service needs.
- Disseminating NYTD data beyond state staff and youth to service providers, courts, foster parents and other stakeholders.
- Tailoring the DPQI review process to focus on the appropriate review of youth in extended foster care and accurate reporting of NYTD elements for youth in the NYTD reporting populations;
- Consulting with youth to develop targeted survey questions for DPQI survey; and
- Developing performance measures using NYTD data to raise visibility of practice issues impacting transitioning youth.

We also strongly encourage the state to engage young people as stakeholders in these CQI efforts by consulting with the DREAM Council and State Ambassador Council.

Data Element	Rating	Findings
1. State	4	Data collection, mapping, reporting and data quality for this element is sufficient.
2. Report date	4	Data collection, mapping, reporting and data quality for this element is sufficient.
3. Record number	4	Data collection, mapping, reporting and data quality for this element is sufficient.
4. Date of birth	4	Data collection, mapping, reporting and data quality for this element is sufficient. During the case record review, we identified one record (7) that contained no birth certificate.
5. Sex	4	Data collection, mapping, reporting and data quality for this element is sufficient.
6. Race: American Indian or Alaska Native	2	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, element 6 and 16 are different elements that must be captured separately. Like all race information, element 6 is a <i>self-identified</i> description indicative of how a person views him or herself and his affiliation with a tribal community. Element 16, by contrast, focuses on either <i>enrollment in or eligibility for membership in</i> one of the over 560 federally recognized tribes only. During the case record review, we learned that the state is not reporting any values captured in the “additional races identified with” field. As a result, the state is unable to report all races for multiracial youth as required.
7. Race: Asian	2	During the case record review, we learned that the state is not reporting any values captured in the “additional races identified with” field. As a result, the state is unable to report all races for multiracial youth as required.
8. Race: Black or African American	2	During the case record review, we learned that the state is not reporting any values captured in the “additional races identified with” field. As a result, the state is unable to report all races for multiracial youth as required.
9. Race: Native Hawaiian or Other Pacific Islander	2	During the case record review, we learned that the state is not reporting any values captured in the “additional races identified with” field. As a result, the state is unable to report all races for multiracial youth as required.

Data Element	Rating	Findings
10. Race: White	2	During the case record review, we learned that the state is not reporting any values captured in the “additional races identified with” field. As a result, the state is unable to report all races for multiracial youth as required. In case record 4, the youth reported the additional race “White” that was not reported to NYTD.
11. Race: Unknown	2	During the system demonstration, we learned that the state uses the values “Safe Haven” and “abandoned” to explain why race information is not known. However, neither of these values map to element 11 (only “incapacitated/unable to communicate maps to “yes” for element 11). FACTS permits the selection of both a specified race and an unknown race (e.g., “multi-racial youth – other race unknown”). However we learned in the state’s test case submission (test case #1) and in the case record review (15), that only the “primary race identified with” field value is reported to NYTD and not the “additional races identified with” field values for multiracial youth. The system must permit the selection of multiple races, including allowing “race: unknown” (“yes” for element 11) to be selected in combination with another race category when at least one race of a multiracial youth is unknown.
12. Race: Declined	4	Data collection, mapping, reporting and data quality for this element is sufficient.
13. Hispanic or Latino ethnicity	4	Data collection, mapping, reporting and data quality for this element is sufficient.
14. Foster care status services	4	Data collection, mapping, reporting and data quality for this element is sufficient. The state logs the foster care status of youth in the “Court Status” tab in FACTS. Youth with the legal status codes “agreement for foster care”, “permanent state”, “summary removal” or “temporary county” who have a valid placement type are considered to be in foster care for NYTD purposes.
15. Local agency	2	During the system demonstration, we learned that the state reports the FIPS code that corresponds to the local office with the “supervisory assignment” for the youth’s case. However, it is not clear whether reporting this office is consistent with the requirement to report the local office with primary responsibility for providing services to a youth who is not in foster care. During the system demonstration, we learned that youth placed in Alabama from another state via the Interstate Compact for the Placement of Children (ICPC) are not reported with the sending state’s local agency code. The state must update FACTS to capture the “sending” state’s FIPS code for this element. During the case record review, we identified three records (4, 12, 21) of youth whose local agency code did not match the code that corresponded with the most recent local agency with responsibility for the youth.

Data Element	Rating	Findings
16. Federally recognized tribe	2	<p>In our pre-onsite review of state data files submitted to date, we noted that only 17 youth have been reported to be members of federally recognized tribes since 2011. At the onsite review, we discussed the reasons why the frequency of reported tribal youth is low. During the system demonstration, we learned that the state only collects information on a youth's eligibility/membership in a federally recognized tribe if at least one of the youth's races is "American Indian/Alaska Native". The state must collect information on a youth's membership/eligibility for membership in a tribe separately from the youth's race. The state also lacks a method to report "blank" when membership in a federally recognized tribe is still pending verification (73 FR 10346). While the state does permit "undetermined" to be entered in the field that collects information on a youth's tribal membership, this value incorrectly maps to "no" for element 16 instead of "blank" (we noted this example in test case #4, in which a youth whose tribal membership was pending verification was incorrectly reported "no" instead of "blank"). It also is unclear how workers interpret the meaning of "undetermined" in this menu. The state requires workers to select at least one tribe for a youth's who is a member or eligible for membership in a federally recognized tribe. However, the state indicated that the pick list of tribes has not been updated in over five years. We recommend that the state update this list with the most current listing of federally recognized tribes and eliminate the option of "other" from the discrete list of tribes. Finally, we encourage the state to consider routinely inquiring about a youth's possible tribal membership at intake (including collecting this information on the intake screens).</p>
17. Adjudicated delinquent	2	<p>During the system demonstration, we learned that the state reports a value for element 17 (adjudicated delinquent) based on whether or not the youth in foster care was adjudicated delinquent during the report period in which the youth received services (also noted in test case #2, in which a youth was adjudicated delinquent in 2012, but state reported "no" for element 17). Element 17 should reflect whether or not a youth was ever adjudicated delinquent regardless of their foster care status. We also learned that caseworkers do not routinely enter information on court orders indicating adjudications for delinquency. These issues have contributed to very few youth (only eight) reported to have been reported adjudicated delinquent since 2011. During the case record review, we identified one record (15) of a youth who had been adjudicated delinquent and committed to Department of Youth Services (DYS) custody but that the state did not report was adjudicated delinquent to NYTD (e.g., state reported "no" for element 17). We recommend that the state develop procedures to routinely inquire whether youth served by the Chafee agency were ever adjudicated delinquent, particularly for dually involved youth served by both the child welfare agency and the juvenile justice agency.</p>

Data Element	Rating	Findings
18. Educational level	2	<p>During the system demonstration, we learned that the state is incorrectly reporting the current grade level of served youth for element 18 instead of the highest grade level completed (also noted in test cases #1, #3 and #4). We also noted that there were many confusing or duplicative options under the “current” and “highest” grade level completed menus (e.g., menu contains both “7<sup>th</sup> to 12<sup>th</sup> grade” and separate options for “grade 7”, “grade 8”, etc.) that may make it difficult for a worker to consistently select the correct grade level for a youth. We recommend consolidating this list into a discrete set of clearly defined, mutually exclusive options. We also learned that the state incorrectly maps all options for college (e.g., 1 year of college, 2 years of college, etc.) to “post-secondary education” for youth in the served population (also noted in test case #2). No values are mapped to “college”. As a result, no served youth have been reported to be in college. Finally, we learned that the state maps the values “GED classes” and “GED obtained” to “12<sup>th</sup> grade” for element 18. The state must report the last grade completed by the youth prior to earning or working to earn a GED. Finally, during the case record review, we noted 17 out of 22 records reported with education data contained inaccurate educational level information (2, 3, 5-9, 11-16 and 19-22). Some of these records had not been updated in a year or longer.</p>
19. Special education	2	<p>During the system demonstration, we learned that the state reports “yes” for element 19 (special education) for any youth with the value “special education” ever selected from the “education performance” menu on the education screen. However, “special education” is not an indicator of a youth’s relative performance in school (e.g., above average, average, below grade level, etc.) but rather an indication of the unique needs of a youth that is intended to be addressed through specialized instruction. Consequently, we recommend capturing information on a youth’s receipt of special education in a separate field.</p> <p>Currently, if “special education” is selected in the “education performance” field, then the user must elect a “special education level” from another required drop-down menu. However, it is not clear whether all the values in the “special education level” menu meet the definition of “special education” as defined in element 19 (45 CFR 1356.83(g)(19)). Finally, because there is no date range associated with element 19, the state is reporting whether a youth ever received special education services instead of accurately reporting whether a youth received such services during the same period in which they received independent living services. In test case #2, the state incorrectly reported “yes” for element 19. The youth was in college, however, and not currently receiving special education services. In test case #3, the youth had an active Individualized Education Plan (IEP), but the state incorrectly reported “no” for element 19. During the case record review, we identified one record (8) of a youth who receiving special education instruction as indicated in case notes, but was not recorded in the FACTS education and screen, so element 19 was incorrectly reported as “no” to NYTD.</p>

Data Element	Rating	Findings
<b>20. Independent living needs assessment</b>	<b>3</b>	<p>This data element is intended to capture information on assessments that systematically identify a youth's independent living skills, strengths and needs. The state's policy is to administer such a needs assessment before independent living services are paid for or provided to the youth starting at age 14 and then updated annually for as long as the youth receives services. In Alabama, the Daniel Memorial Life Skills Assessment is the typical assessment used to identify youth's needs. During the system demonstration, we learned that some counties also use the Armed Services Vocational Aptitude Battery (ASVAB) as an assessment tool. We did not observe an option in FACTS specific to ASVAB in the assessment tab, however. We also noted that the state's system logs several different versions of the Daniel Memorial Assessment, the Ansell Casey Life Skill Assessment and "vocational assessments" all under the category of "independent living needs assessment (element 20) for NYTD purposes. It is not clear whether all of these assessment types meet the definition of element 20, which is a "systematic procedure to identify a youth's basic skills, emotional and social capabilities, strengths, and needs to match the youth with appropriate independent living services." In test case #2, the state incorrectly reported that the youth had received an independent living needs assessment ("yes" for element 20), but the case scenario did not indicate such an assessment was completed.</p> <p>During the case review, we identified records without a copy of the Daniel Memorial Life Skills Assessment in the FACTS file cabinet. For three records (1, 3 and 14), we noted that the youth had received the life skills assessment but the state incorrectly reported "no" for element 20.</p>
<b>21. Academic support</b>	<b>1</b>	<p>This data element is intended to capture services designed to help a youth <i>complete high school or obtain a GED</i>. However, the state incorrectly records many services under this element that relate to a youth's post-secondary education (e.g., ACT/SAT preparation, assistance with FAFSA, college tours), financial capabilities (e.g., banking, money management, etc.) or daily living skills (e.g., food preparation, food management, health, etc.). In test case #1, the state incorrectly reported "yes" for this element for a youth who received post-secondary education supports. Similarly, during the case record review, we identified six records (10, 11, 14, 16, 17 and 20) of youth who the state reported received this service, however, no documentation to validate this information was found in the case records.</p>
<b>22. Post-secondary educational support</b>	<b>1</b>	<p>This data element is intended to capture services designed to help a youth <i>enter or complete college or other post-secondary education</i>. However, the state incorrectly records many services under this element that relate to a youth's financial capabilities (e.g., banking, money management, etc.) or daily living skills (e.g., food preparation, food management, health, etc.). Other services captured under this element are vaguely defined (e.g., "knowledge of community", "resources") and so we cannot determine whether such activities are appropriately categorized under this element. In test case #1, the state incorrectly reported "yes" for this element for a youth who received post-secondary education supports. In test case #2, the state incorrectly reported that the youth was not receiving post-secondary education support ("no" for element 22), but the case scenario indicated that the youth received college counseling. During the case record review we identified two records (11 and 14) of youth who received college counseling but the state incorrectly reported "no" for element 22.</p>

Data Element	Rating	Findings
<b>23. Career preparation</b>	<b>1</b>	This data element is intended to capture services designed to help a youth <i>find, apply for, and retain appropriate employment</i> . However, the state incorrectly records many services under this element that relate to a youth's post-secondary education (e.g., assistance with college), financial capabilities (e.g., money management, etc.) rather than a youth's career preparation. Other services captured under this element are vaguely defined (e.g., "State Advisory Council", "stress management") and so we cannot determine whether such activities are appropriately categorized under this element. In test case #2, the state incorrectly reported that the youth was not receiving career preparation services ("no" for element 23), but the case scenario indicated that the youth received help with a resume and identifying part-time job opportunities. During the case record review, we identified one record (14) of a youth who the state reported received this service, however, no documentation to validate this information was found in the case record. In another record (3), the state reported "yes" for element 23, but we could not identify the source of this value in the FACTS screens that capture data on this element.
<b>24. Employment programs or vocational training</b>	<b>1</b>	This data element is intended to capture information on <i>training designed to build a youth's skills for a specific trade/vocation or participation in an apprenticeship, internship, or summer employment</i> . However, the state incorrectly records many services under this element that relate to a youth's financial capabilities (e.g., money management, etc.) rather than a youth's participation in employment programs/vocational training. Other services captured under this element are vaguely defined (e.g., "problem solving", "State Advisory Council") and so we cannot determine whether such activities are appropriately categorized under this element. In test cases #2 and #4, the state incorrectly reported that both youth were in an employment/vocational training program ("yes" for element 24), but the case scenarios did not indicate that the youth were in such a program.
<b>25. Budget and financial management</b>	<b>1</b>	This data element is intended to capture services designed to help a youth access <i>training or practice with living within a budget</i> . However, many of the services captured under this element are vaguely defined (e.g., "problem solving", "food management") and so we cannot determine whether such activities are appropriately categorized under this element. During the case record review, we identified one record (3) of a youth who received this service as documented in ILP "sessions" screen, but the state incorrectly reported "no" for element 25 because the data were not entered in time for the state's NYTD data file submission. We also identified one record (7) of a youth who was reported to have received a paid budget and financial management service, but because the service was paid for with Social Security funds, should not have been reported to NYTD. In another record (20), the state reported that the youth received a payment related to budget and financial management but no documentation was located that described this service. For another record (14), the youth incorrectly reported "no" for this element even though the youth received help developing a budget from the caseworker.



Data Element	Rating	Findings
26. Housing education and home management training	1	This data element is intended to capture information on <i>assistance or training in locating and maintaining housing, or instruction in activities of basic living such as food preparation, laundry and housekeeping</i> . However, many of the services captured under this element are vaguely defined (e.g., “problem solving”, “Teen Conference”) and so we cannot determine whether such activities are appropriately categorized under this element. In test case #2, the state incorrectly reported that the youth was not receiving housing education/home management training (“no” for element 26), but the case scenario indicated that the youth’s caseworker helped youth find and apply for an apartment.
27. Health education and risk prevention	1	This data element is intended to capture information on services designed <i>provide information about hygiene, nutrition, fitness and exercise or the avoidance of health risks</i> . However, many of the services captured under this element are vaguely defined (e.g., “problem solving”, “Teen Conference”) and so we cannot determine whether such activities are appropriately categorized under this element. During the case record review, we identified one record (9) of youth who received this service as documented in case note, but the state incorrectly reported “no” for element 27.
28. Family support and healthy marriage education	1	This data element is intended to capture information on <i>education about safe and stable families, healthy marriage and relationships</i> . However, the state incorrectly records many services under this element that relate to a youth’s financial capabilities (e.g., money management, etc.) or basic life skills (e.g., “food preparation”, “health”) rather than a youth’s receipt of family support/healthy marriage education. Other services captured under this element are vaguely defined (e.g., “problem solving”, “State Advisory Council”) and so we cannot determine whether such activities are appropriately categorized under this element. In test case #4, the state incorrectly reported that youth was not receiving this service (“no” for element 28) but the case scenario indicated that the youth attended a healthy relationship seminar paid for by the state. During the case record review, we identified one record (3) of a youth who received this service as documented in ILP “sessions” screen, but the state incorrectly reported “no” for element 28 because the data were not entered in time for the state’s NYTD data file submission. In two other records (19 and 20), the state reported that the youth received a payment categorized as “family support/healthy marriage education” but no documentation or further description could be located in the case record.
29. Mentoring	1	This data element is intended to capture information on whether a youth has been matched <i>with a screened and trained adult for a one-on-one mentoring relationship</i> . However, the services captured under this element are vaguely defined (e.g., “other”, “State Advisory Council”) and so we cannot determine whether such activities are appropriately categorized under this element. In test case #4, the state incorrectly reported that the youth was receiving mentoring services (“yes” for element 29), but the case scenario indicated that the state agency did not arrange or support the mentoring relationship. During the case record review, we identified one record (20) of a youth the state reported received a payment categorized as “mentoring” but no documentation or further description could be located in the case record.



Data Element	Rating	Findings
<b>30. Supervised independent living</b>	<b>1</b>	The state does not currently report supervised independent living placements as a service for element 30. In the Independent Living Services screens in FACTS, the only value that maps to the element is "Other". It is not clear what "other" refers or whether caseworkers understand this value. In test case #2, the state incorrectly reported that the youth was not in a supervised independent living placement ("no" for element 30), but the case scenario indicated that the youth's on campus housing was a supervised independent living placement.
<b>31. Room and board financial assistance</b>	<b>1</b>	The state lacks a business process to collect and report information on room and board payments made to vendors on behalf of youth. In the Independent Living Services screens in FACTS, the only value that maps to the element is "Other". It is not clear what "other" refers or whether caseworkers understand this value. In test case #2, the state incorrectly reported that the youth was not receiving room and board financial assistance ("no" for element 31), but the case scenario indicated that the youth was receiving a payment for housing.
<b>32. Education financial assistance</b>	<b>1</b>	The state indicated that case-level data on Education and Training Vouchers (ETV) is not entered into FACTS from the state's ETV vendor. As a result, the state does not report ETVs under element 32 as required. Further, because the state limits reporting on independent living services to youth between ages 14 and 21, the state would have been unable to report youth eligible to receive ETV up to age 23. In the Independent Living Services screens in FACTS, the only description for "education financial assistance" is "Other". It is not clear what "other" refers or whether caseworkers understand this value. In test case #2, the state incorrectly reported that the youth was not receiving education financial assistance ("no" for element 32), but the case scenario indicated that the youth was receiving ETV funds. During the case record review, we identified three records (10, 16 and 20) of youth who the state reported received a payment, however, no documentation to validate this information was found in the case records. In another record (9), the youth received assistance paying a school registration fee but that the state incorrectly reported "no" for element 32.
<b>33. Other financial assistance</b>	<b>1</b>	In test case #4, the state incorrectly reported that youth did not receive other financial assistance ("no" for element 33), but the case scenario indicated that the youth received a clothing voucher paid for with Chafee funds. During the case record review, we identified two records (17 and 20) of youth who were reported to have received other financial assistance but no documentation describing the purpose of the payment was found in the case records.
<b>34. Outcomes reporting status</b>	<b>3</b>	<p>We note that the state failed the 90% error-free standard for element 34 when it reported the out-of-range value "not in sample" for 6 records in 2011B. More recently, we found that the state is reporting survey data in the records of youth it reported did not participate in the NYTD survey (see DQA #23 errors in 11B, 13A, 13B, 14A, 14B, 15A, 16A and 16B). Youth who participated in the survey but for whom the state reported a reason for non-response in element 34 (e.g., "incarcerated", "runaway", "incapacitated") are not included in our calculation of survey participation. We encourage the state to investigate the cause of this data quality concern.</p> <p>During the case record review, we identified one record (19) of a youth who did not participate in the baseline survey because the "parent declined." However, the youth was placed in a group home at the time and no other documentation described the youth's parent had declined participation in the survey on the youth's behalf.</p>

Data Element	Rating	Findings
<b>35. Date of outcome data collection</b>	<b>4</b>	While we did not identify any technical problems with the manner in which the state collects data on this element, we do note that the state failed the 90% error-free information standard for this element due to late surveys reported in 2011A (for 63 youth) and 2011B (for 17 youth). The state also reported late collected survey data in 2013B (1 youth). We encourage the state to continue closely reviewing data reported in this element to ensure all youth are being surveyed timely. In test case #1, the state incorrectly reported the date the survey was entered into the child welfare information system rather than the last date the youth took the survey.
<b>36. Foster care status – outcomes</b>	<b>2</b>	The state determines the foster care status of baseline and follow-up youth based on the date stored in the “survey submitted date” captured in FACTS. However, this field is blank when youth do not take the survey. Without a date, the state reports “no” for this element for all non-participants.
<b>37. Current full-time employment</b>	<b>3</b>	The state’s survey instrument adds a prompt in question #10 (element 37) and #11 (element 38) that youth are to add up the hours worked at all jobs to determine whether they are employed full-time (35 hours or more/week) or part-time (less than 35 hours/week). While the regulation specifies the definition of “full-time” and “part-time” employment in terms of number of total hours worked, these two data elements are not mutually-exclusive. A youth may report having both full-time employment (working in one job for 35 hours a week, for example) and part-time job concurrently (working a different job for 10 hours a week, for example) (see <a href="#">Q&amp;A 3.14</a> ). Consequently, the state should revise the survey prompts to assist youth in answering these two questions accurately.
<b>38. Current part-time employment</b>	<b>3</b>	The state’s survey instrument adds a prompt in question #10 (element 37) and #11 (element 38) that youth are to add up the hours worked at all jobs to determine whether they are employed full-time (35 hours or more/week) or part-time (less than 35 hours/week). While the regulation specifies the definition of “full-time” and “part-time” employment in terms of number of total hours worked, these two data elements are not mutually-exclusive. A youth may report having both full-time employment (working in one job for 35 hours a week, for example) and part-time job concurrently (working a different job for 10 hours a week, for example) (see <a href="#">Q&amp;A 3.14</a> ). Consequently, the state should revise the survey prompts to assist youth in answering these two questions accurately.
<b>39. Employment-related skills</b>	<b>4</b>	Data collection, mapping, reporting and data quality for this element is sufficient.
<b>40. Social Security</b>	<b>4</b>	Data collection, mapping, reporting and data quality for this element is sufficient.
<b>41. Educational aid</b>	<b>4</b>	Data collection, mapping, reporting and data quality for this element is sufficient.
<b>42. Public financial assistance</b>	<b>2</b>	The state’s survey instrument includes questions related to a youth’s use of public assistance (elements 42-44). Because these questions are not applicable to youth in foster care, they are not to be included on the instrument used to collect outcomes information from baseline youth.
<b>43. Public food assistance</b>	<b>2</b>	The state’s survey instrument includes questions related to a youth’s use of public assistance (elements 42-44). Because these questions are not applicable to youth in foster care, they are not to be included on the instrument used to collect outcomes information from baseline youth.

Data Element	Rating	Findings
44. Public housing assistance	2	The state’s survey instrument includes questions related to a youth’s use of public assistance (elements 42-44). Because these questions are not applicable to youth in foster care, they are not to be included on the instrument used to collect outcomes information from baseline youth.
45. Other financial support	4	Data collection, mapping, reporting and data quality for this element is sufficient.
46. Highest educational certification received	4	Data collection, mapping, reporting and data quality for this element is sufficient.
47. Current enrollment and attendance	4	Data collection, mapping, reporting and data quality for this element is sufficient.
48. Connection to adult	4	Data collection, mapping, reporting and data quality for this element is sufficient.
49. Homelessness	2	The state’s survey instrument asks about a youth’s experience with homelessness in the past two years. Because the state uses the same instrument to collect information from all youth, the state is unable to gather outcomes information on a baseline population youth’s lifetime experience with homelessness.
50. Substance abuse referral	2	The state’s survey instrument asks about a youth’s substance abuse referrals in the past two years. Because the state uses the same instrument to collect information from all youth, the state is unable to gather outcomes information on a baseline population youth’s lifetime experience with such referrals.
51. Incarceration	2	The state’s survey instrument asks about whether the youth was incarcerated in the past two years. Because the state uses the same instrument to collect information from all youth, the state is unable to gather outcomes information on a baseline population youth’s lifetime experience with incarceration.
52. Children	2	The state’s survey instrument asks whether a youth gave birth or fathered a child in the past two years. Because the state uses the same instrument to collect information from all youth, the state is unable to gather outcomes information on whether a baseline population youth ever had children. During the system demonstration, we confirmed that the state’s web-based survey correctly employs skip logic to assist the youth in responding appropriately to the survey questions collecting information for elements 52 and 53. However, the state’s extraction routine automatically corrects any other logically inconsistent responses “not applicable” the youth responses to the survey questions corresponding to elements 52 and 53 without consulting the youth. Consistent with guidance issued in <a href="#">Q&amp;A #3.25</a> , states may not alter a youth's survey responses without consulting the youth.

Data Element	Rating	Findings
53. Marriage at child's birth	2	During the system demonstration, we confirmed that the state's web-based survey correctly employs skip logic to assist the youth in responding appropriately to the survey questions collecting information for elements 52 and 53. However, the state's extraction routine automatically corrects any other logically inconsistent responses "not applicable" the youth responses to the survey questions corresponding to elements 52 and 53 without consulting the youth. Consistent with guidance issued in <a href="#">Q&amp;A #3.25</a> , states may not alter a youth's survey responses without consulting the youth.
54. Medicaid	4	Data collection, mapping, reporting and data quality for this element is sufficient.
55. Other health insurance coverage	2	The state is using "not applicable" as response option in element 55, however, "not applicable" is not a valid value (see out of range data errors in element 51 in 2013A, 2014A, 2014B and 2017A).
56. Health insurance type: Medical	2	During the system demonstration, we confirmed that the state's extraction routine automatically corrected to "not applicable" the youth responses to the survey questions corresponding to elements 56-58 without consulting the youth. Consistent with guidance issued in <a href="#">Q&amp;A #3.25</a> , states may not alter a youth's survey responses without consulting the youth. We also noted that the instrument lacks skip patterns directing the youth to answer only the questions that are applicable to them for the survey questions concerning "health insurance coverage types" (elements 56-58).
57. Health insurance type: Mental health	2	During the system demonstration, we confirmed that the state's extraction routine automatically corrected to "not applicable" the youth responses to the survey questions corresponding to elements 56-58 without consulting the youth. Consistent with guidance issued in <a href="#">Q&amp;A #3.25</a> , states may not alter a youth's survey responses without consulting the youth. We also noted that the instrument lacks skip patterns directing the youth to answer only the questions that are applicable to them for the survey questions concerning "health insurance coverage types" (elements 56-58).
58. Health insurance type: Prescription drugs	2	During the system demonstration, we confirmed that the state's extraction routine automatically corrected to "not applicable" the youth responses to the survey questions corresponding to elements 56-58 without consulting the youth. Consistent with guidance issued in <a href="#">Q&amp;A #3.25</a> , states may not alter a youth's survey responses without consulting the youth. We also noted that the instrument lacks skip patterns directing the youth to answer only the questions that are applicable to them for the survey questions concerning "health insurance coverage types" (elements 56-58).

## Appendix D. Improvement Plan

---

General Requirement	Rating	Findings to Address
1. The state reports information on all youth in the served population.	2	1.1 The state must establish a business practice to consistently and accurately capture information on all independent living services paid for or provided by the state, including: <ul style="list-style-type: none"><li>– Services provided to youth who are no longer in foster care or who are older than 21;</li><li>– Education and Training Vouchers;</li><li>– Payments made directly to youth; and</li><li>– Services provided to youth even if there is no associated payment for that service.</li></ul>
2. The state reports information on all youth in the baseline population.	3	2.1 The state is to modify its reporting process to include outcomes information in the NYTD date file from youth in the baseline population who were surveyed late (instead of reporting such youth as “unable to locate or invite”).  2.2 The state is to modify its reporting process to ensure that baseline population youth records are reported both in the report period file that corresponds to the youth’s 17 <sup>th</sup> birthday and the report period file in which the youth was surveyed (see <a href="#">NYTD Q&amp;A 2.55</a> ).
3. The state reports information on all youth in the follow-up population.	3	3.1 The state is to modify its reporting process to include outcomes information in the NYTD date file from youth in the follow-up population who were surveyed late (instead of reporting such youth as “unable to locate or invite”) (see <a href="#">NYTD Q&amp;A #1.35</a> )

General Requirement	Rating	Findings to Address
4. The state implements an appropriate survey methodology to collect youth outcomes data.	2	<p>4.1 The state must revise its NYTD survey instruments to include survey questions and valid response options as they appear in the NYTD regulation. In particular the state must:</p> <ul style="list-style-type: none"> <li>– Revise the survey question that related to a youth’s lifetime experiences with homelessness (<b>element 49</b>), substance abuse referrals (<b>element 50</b>), incarceration (<b>element 51</b>) and children (<b>element 52</b>);</li> <li>– Remove the survey questions regarding their use of public assistance (<b>elements 42-44</b>) from the baseline survey instrument;</li> <li>– The state web-based survey contains prompts to assist the youth in understanding the NYTD survey questions and response options. However, we observed no standard convention used for this purpose (e.g., sometimes the prompt only clarified the meaning of a term used in the survey question, sometimes the prompt clarified only a portion of the response options);</li> <li>– Revise the prompt used to describe question #10 (element 37) and #11 (element 38), which are misleading (see related findings in elements 37 and 38 below);</li> <li>– Standardize the format and language used in survey question prompts on all versions of the survey (e.g., paper, web-based, etc.).</li> <li>– Add skip patterns to all survey instruments directing the youth to answer only the questions that are applicable to them for the survey questions concerning “health insurance coverage types” (<b>elements 56-58</b>).</li> </ul> <p>4.2 The state should provide a common point of contact (toll-free phone number or email address) for all youth who encounter difficulties accessing or taking the NYTD survey.</p> <p>4.3 The state should develop a youth-friendly introduction to the NYTD survey in consultation with the State Youth Council to describe the purpose, benefits and confidentiality of the NYTD survey. All versions of the NYTD survey instrument should also include contact information for the state agency.</p>
6. The state reports NYTD data files following ACF’s specifications.	2	<p>6.1 The state must update its extraction code to ensure only data applicable to the reporting population membership of a youth. In particular, the state should leave blank elements 14, 15 and 20-33 for youth who are not in the served population.</p>

General Requirement	Rating	Findings to Address
7. The state conducts quality assurance to ensure NYTD information can be analyzed and used.	2	<p>1.1 The state must develop a quality assurance process to process to ensure that NYTD data are accurate, complete, timely, and consistent in definition and usage across the agency. Specifically, the state is to:</p> <ul style="list-style-type: none"> <li>– Develop a process to periodically examine the accuracy or completeness of data on youth served by the independent living program.</li> <li>– 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&amp;A #3.25).</li> </ul> <p>1.2 The state is strongly encouraged to develop and plans to integrate NYTD data into the state’s 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.</p>

Data Elements	Rating	Findings to Address
6. Race: American Indian/Alaska Native	2	<p>6.1 The state’s program code must be updated to enable the state to report more than one race for a youth (e.g., the values captured in the “additional races identified with” menu in FACTS must be reported).</p> <p>6.2 The state must modify its system to collect information on youths’ race and tribal membership information separately (e.g., remove the logic that enables information for tribal membership (element 16) to be entered only if a youth is reported to be American Indian or Alaska Native (“yes” for element 6)).</p>
7. Race: Asian	2	<p>7.1 The state’s program code must be updated to enable the state to report more than one race for a youth (e.g., the values captured in the “additional races identified with” menu in FACTS must be reported).</p>

Data Elements		Rating	Findings to Address
8.	Race: Black or African American	2	8.1 The state's program code must be updated to enable the state to report more than one race for a youth (e.g., the values captured in the "additional races identified with" menu in FACTS must be reported).
9.	Race: Native Hawaiian or Other Pacific Islander	2	9.1 The state's program code must be updated to enable the state to report more than one race for a youth (e.g., the values captured in the "additional races identified with" menu in FACTS must be reported).
10.	Race: White	2	10.1 The state's program code must be updated to enable the state to report more than one race for a youth (e.g., the values captured in the "additional races identified with" menu in FACTS must be reported).
11.	Race: Unknown	2	11.1 The state's program code must be updated to enable the state to report more than one race for a youth (e.g., the values captured in the "additional races identified with" menu in FACTS must be reported), including allowing "race: unknown" ("yes" for element 11) to be selected in combination with another race category when at least one race of a multiracial youth is unknown.
15.	Local agency	2	15.1 The state must report the "sending" state's local agency code for youth placed and served in Alabama from another state via the Interstate Compact for the Children (ICPC).



	Data Elements	Rating	Findings to Address
16.	Federally recognized tribe	2	<p>16.1 The state must modify its system to collect information on youths' race and tribal membership information separately (e.g., remove the logic that enables information for tribal membership (element 16) to be entered only if a youth is reported to be American Indian or Alaska Native ("yes" for element 6)).</p> <p>16.2 The state is to report "blank" for this element when the federally recognized tribal membership or eligibility for membership is not known or is pending verification.</p> <p>16.3 The state must ensure that it can correctly report whether the youth was <i>enrolled in</i> <u>or</u> <i>eligible for membership</i> in a federally recognized tribe. If the state wants to continue requiring workers to enter the name of the youth's tribe, then the state must update the pick list of federally-recognized tribes and eliminate "other" as an option.</p>
17.	Adjudicated delinquent	2	<p>17.1 The state is to revise its data collection process to enable the reporting of whether or not a youth in the served population was ever adjudicated delinquent, regardless of foster care status.</p>

	Data Elements	Rating	Findings to Address
18.	Educational level	2	<p>18.1 The state must report the last grade level completed by youth instead of the current grade level of the youth. For youth who complete a GED or who attend GED classes, the state must report the last grade completed by the youth prior to earning a GED or beginning GED classes.</p> <p>18.2 The state must modify its data mapping to ensure that youth who complete <i>at least one semester</i> of study at a college or university are reported with an education level of “college”.</p> <p>18.3 The state should consolidate its list of grade levels into a discrete set of clearly defined, mutually exclusive options (see findings in element 18 for more information).</p> <p>18.4 The state is to establish supervisory controls to ensure that information on a youth’s education record is entered/updated timely, especially for youth who are no longer in the state’s custody.</p>
19.	Special education	2	<p>19.1 The state system must be modified to track whether the youth was receiving special education during the report period in which the youth received services.</p> <p>19.2 The state should consider collecting information on special education separately from the menu used to collect information on a youth’s “education performance” as “special education” is a service and is not an indicator of a youth’s relative performance in school.</p>

Data Elements	Rating	Findings to Address
		19.3 The state is to establish supervisory controls to ensure that information on a youth's special education status is entered/updated timely, particularly for youth no longer in the state's custody.
20. Independent living needs assessment	3	20.1 The state should conduct quality assurance to ensure independent living needs assessments are accurately reported during the report period in which they are delivered and that the specific assessment conducted meets the definition provided in 45 CFR 1356.83(g)(20).
21. Academic support	1	<p>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).</p> <p>21.2 The state must revise its data mapping to ensure the activities reported as "academic support" are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(21).</p>
22. Post-secondary educational support	1	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).

Data Elements	Rating	Findings to Address
		22.2 The state must revise its data mapping to ensure the activities reported as “post-secondary educational support” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(22).
<b>23. Career preparation</b>	<b>1</b>	<p>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).</p> <p>23.2 The state must revise its data mapping to ensure the activities reported as “career preparation” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(23).</p>
<b>24. Employment programs or vocational training</b>	<b>1</b>	<p>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).</p> <p>24.2 The state must revise its data mapping to ensure the activities reported as “employment programs or vocational training” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(24).</p>
<b>25. Budget and financial management</b>	<b>1</b>	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).

Data Elements	Rating	Findings to Address
		25.2 The state must revise its data mapping to ensure the activities reported as “budget and financial management” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(25).
26. Housing education and home management training	1	<p>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).</p> <p>26.2 The state must revise its data mapping to ensure the activities reported as “housing education and home management training” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(26).</p>
27. Health education and risk prevention	1	<p>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).</p> <p>27.2 The state must revise its data mapping to ensure the activities reported as “health education and risk prevention” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(27).</p>
28. Family support and healthy marriage education	1	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).

Data Elements	Rating	Findings to Address
		28.2 The state must revise its data mapping to ensure the activities reported as “family support and healthy marriage education” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(28).
29. Mentoring	1	<p>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).</p> <p>29.2 The state must revise its data mapping to ensure the activities reported as “mentoring” are clearly defined and meet the definition of the element found at 45 CFR 1356.83(g)(29).</p>
30. Supervised independent living	1	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). <b>In particular, the state must report supervised independent living placements under element 31.</b>
31. Room and board financial assistance	1	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). <b>In particular, the state must develop a business process to collect and report</b>

Data Elements		Rating	Findings to Address
			<b>information on room and board payments made to vendors on behalf of youth under element 31.</b>
32.	Education financial assistance	<b>1</b>	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). <b>In particular, the state must report ETVs provided to youth under element 32.</b>
33.	Other financial assistance	<b>1</b>	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).
34.	Outcomes reporting status	<b>3</b>	34.1 The state should develop a quality assurance process to ensure that the correct outcomes reporting status (i.e., “participated”) is reported for youth who participate in the NYTD survey. “Incarcerated”, “runaway” and “incapacitated” are non-participation reasons and are not to be reported for element 34 for youth who participate in the NYTD survey.
36.	Foster care status – outcomes	<b>2</b>	36.1 The state must accurately report the foster care status of youth who do not participate in the NYTD survey (instead of defaulting “no” for non-participants).
37.	Current full-time employment	<b>3</b>	37.1 The state must revise its survey prompts to include the correct description of current “full-time” and “part-time” employment (refer to findings in elements 37 and 38).
38.	Current part-time employment	<b>3</b>	38.1 The state must revise its survey prompts to include the correct description of current “full-time” and “part-time” employment (refer to findings in elements 37 and 38).

Data Elements		Rating	Findings to Address
42.	Public financial assistance	2	42.1 The state is to remove the survey questions related to a youth's use of public assistance (elements 42-44) from the baseline survey instruments.
43.	Public food assistance	2	43.1 The state is to remove the survey questions related to a youth's use of public assistance (elements 42-44) from the baseline survey instruments.
44.	Public housing assistance	2	44.1 The state is to remove the survey questions related to a youth's use of public assistance (elements 42-44) from the baseline survey instruments.
49.	Homelessness	2	49.1 The state must revise its baseline survey instrument to include the correct survey question ("Have you ever been homeless?") for element 49.
50.	Substance abuse referral	2	50.1 The state must revise its baseline survey instrument to include the correct survey question ("Have you ever referred yourself or has someone else referred you for an alcohol or drug abuse assessment or counseling?" for element 50.
51.	Incarceration	2	51.1 The state must revise its baseline survey instrument to include the correct survey question ("Have you ever been confined in a jail, prison, correctional facility, or juvenile or community detention facility, in connection with allegedly committing a crime?") for element 51.
52.	Children	2	<p>52.1 The state must revise its baseline survey instrument to include the correct survey question ("Have you ever given birth or fathered any children that were born?") for element 52.</p> <p>52.2 The state must develop a quality assurance process to 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&amp;A #3.25).</p>



Data Elements		Rating	Findings to Address
53.	Marriage at child's birth	2	53.1 The state must develop a quality assurance process to 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).
55.	Other health insurance coverage	2	55.1 The state must revise its survey instruments to use the correct response options for element 55 ("yes", "no", "don't know" and "declined").
56.	Health insurance type: Medical	2	<p>56.1 The state should add skip logic prompts to direct the youth to respond appropriately to the health insurance coverage questions (elements 56-58).</p> <p>56.2 The state must develop a quality assurance process to 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&amp;A #3.25).</p>
57.	Health insurance type: Mental health	2	<p>57.1 The state should add skip logic prompts to direct the youth to respond appropriately to the health insurance coverage questions (elements 56-58).</p> <p>57.2 The state must develop a quality assurance process to 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&amp;A #3.25).</p>

	Data Elements	Rating	Findings to Address
58.	Health insurance type: Prescription drugs	<b>2</b>	<p>58.1 The state should add skip logic prompts to direct the youth to respond appropriately to the health insurance coverage questions (elements 56-58).</p> <p>58.2 The state must develop a quality assurance process to 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&amp;A #3.25).</p>