

Identifying Enrollees Receiving Title IV-E Adoption Assistance, Foster Care or Guardianship Care in the TAF

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TAF Methodology Brief

Summary

- The most common eligibility pathway to Medicaid for children and youth involved in the child welfare system is through Title IV-E eligibility.
- The eligibility group code variable in the Transformed Medicaid Statistical Information System Analytical Files (TAF) includes information on whether an enrollee is receiving Title IV-E adoption assistance, foster care, or guardianship care.
- This brief explains how TAF users can identify the population of enrollees who receive Title IV-E assistance and provides recommendations on how to compare the information contained in the relevant eligibility group code from external benchmark data sources: the Children's Bureau's Title IV-E Programs Expenditure and Caseload Data and the Administration for Children and Families' Adoption and Foster Care Analysis and Reporting System (AFCARS).

Background

This brief has two objectives. The first is to help users of the Transformed Medicaid Statistical Information System (T-MSIS) Analytic Files (TAF) understand how to identify Medicaid enrollees who receive Title IV-E adoption assistance, foster care, or guardianship care. The second objective is to provide guidance on what to consider when comparing the information in the TAF to external benchmark data sources: the Children's Bureau's Title IV-E Programs Expenditure and Caseload Data and the Administration for Children and Families' (ACF's) Adoption and Foster Care Analysis and Reporting System (AFCARS).

Children and youth become involved with the child welfare system because they were removed from their homes due to abuse or neglect or are receiving in-home child welfare services as a result of an allegation of maltreatment. Children and youth who are removed from their homes might be temporarily placed in foster care. Other children and youth might be permanently placed with an adoptive or kinship guardian family, or they might age out of eligibility for foster care without securing a permanent placement (Medicaid and CHIP Payment Access Commission 2015). State and tribal child welfare agencies are responsible for the safety and well-being of children and youth under their care and must ensure that their health

needs are met. These agencies can be reimbursed by Medicaid to supplement the costs of providing health coverage to children in their care (Congressional Research Service, 2012).

Children and youth in the child welfare system are one of the populations covered by Medicaid. The most common eligibility pathway to Medicaid for children and youth in foster care is through Title IV-E eligibility; under Title IV-E of the Social Security Act, federal funding is made available for child welfare assistance for low-income children removed from their homes (Child Welfare Information Gateway 2022). Title IV-E provides funding for monthly foster care maintenance on behalf of eligible children, along with funds for related case management, training, data collection, and other expenses associated with program administration (table 1).

Table 1. Title IV-E child welfare services

Type of Title IV-E child welfare service	Description
Title IV-E foster care maintenance payments (receiving foster care services)	<ul style="list-style-type: none"> A temporary service provided by states for children who cannot live with their parent(s), due to maltreatment or concerns about parent's ability to provide appropriate care. Placement may be with relatives or with unrelated foster parents, but it can also be in settings such as group homes, residential care facilities, substance use disorder treatment facilities, emergency shelters, and supervised independent living.
Title IV-E guardianship care	<ul style="list-style-type: none"> Guardianship is a judicially created relationship between a child and responsible adult in which the guardian assumes many of the rights and responsibilities that customarily would reside with the child's parents. Guardianship creates a legal relationship between a child and caregiver that is intended to be permanent and self-sustaining and can provide a permanent family for the child, without the necessity of terminating parental rights.
Title IV-E adoption assistance	<ul style="list-style-type: none"> Provides funds to states to support adoptive family placement for children whose special needs or circumstances would otherwise make them difficult to place. Provides federal matching funds, depending on the state's per capita income. Can be one-time payments to help with the costs of adopting a child or monthly subsidies to adoptive families to help with the care of the eligible child. Funds are also available for administrative costs to manage the program, the training of agency staff and adoptive parents, adoptive parent recruitment, and related expenses.

Sources: Child Welfare Information Gateway (2019) and Children's Bureau Administration on Children, Youth, and Families (2012).

Children and youth under age 18 (or up to age 21, depending on the state) who are receiving adoption assistance, foster care, or guardianship care funded by Title IV-E, are automatically eligible for Medicaid in their state of residence. Those who are placed in a licensed residential family-based substance abuse treatment facility may also receive Title IV-E foster care maintenance. Because children and youth are enrolled in this Medicaid eligibility group based on their status as "IV-E children," this group could include young people who are pregnant or postpartum or who are parenting and who might otherwise also be eligible on the basis of being pregnant or being a parent or caretaker (Centers for Medicare & Medicaid Services [CMS] and Administration for Children and Families [ACF] 2020).

Children involved in the child welfare system often have significant health, behavioral, social, and other needs, and Medicaid is an important source of health care coverage for many of them. Some children and youth are not eligible for Title IV-E services, because they receive in-home services¹ or have family income above the established eligibility standard, for example. These children and youth are not automatically eligible for Medicaid, though many are eligible for Medicaid via other pathways, such as the disability or low-income pathways (CMS n.d.). In this analysis, we focus on children and youth who receive adoption assistance, foster care, or guardianship care funded by title IV-E.

The eligibility group code in the TAF (the research-ready version of T-MSIS) can be used to identify the basis on which a person was deemed eligible for Medicaid or CHIP.^{2,3} States must assign every Medicaid and CHIP enrollee to one of the 72 eligibility groups, even if the person meets the qualifications of more than one group. If an applicant meets the qualifications of more than one eligibility group, Medicaid enrollment staff may decide the pathway through which the person gains eligibility.

The next section describes how TAF users can identify enrollees receiving Title IV-E child welfare services. It also discusses how the information contained in the TAF aligns with two external federal benchmark sources: (1) the annual fiscal year (FY) summary of Form CB-496 expenditures and caseloads, as reported by each title IV-E agency, and (2) AFCARS.

Methods

Identifying Medicaid enrollees in the TAF who receive Title IV-E adoption assistance, foster care, or guardianship care

Using the eligibility group code variable, TAF users can identify Medicaid enrollees in the TAF who receive Title IV-E adoption assistance, foster care, or guardianship care (Table 2). If attempting to align with the external benchmark data sources noted below, TAF users will need to identify enrollees in the TAF who are eligible for the Title IV-E foster care program at any point during the measurement period. The measurement period for both data sources is the federal fiscal year (FFY), which runs from October through September of the following year (for example, FFY 2020 is the time period from October 2019 through September 2020). To more accurately tabulate the number of children receiving Title IV-E adoption assistance, foster care, or guardianship care using the TAF eligibility group code variable, TAF users should restrict

¹ Under the Title IV-E Prevention Services Program, authorized by the Families First Prevention Services Act, Title IV-E agencies may claim optional Title IV-E funding for time-limited, evidence-based prevention services for mental health/substance use disorders and in-home parent skill-based programs (sections 471[e], 474[a][6], and 475[13] of the act [42 U.S.C. §§ 671(e), 674(a)(6), 675(13)]).

² Historically, states reported the basis of eligibility in the legacy MSIS in two fields populated with the Maintenance Assistance Status (MAS) and Basis of Eligibility (BOE) codes. These codes were combined in T-MSIS but are no longer required fields. Although MAS and BOE may continue to be reported, fewer states are reporting these data elements over time. In place of MAS and BOE, CMS developed a new coding system for classifying eligibility, known as the eligibility group, which is the focus of this resource.

³ For a full description of the eligibility groups, see Appendix F of the T-MSIS Data Dictionary Appendices, Version 2.4, at <https://www.medicaid.gov/medicaid/data-systems/downloads/tmsis-data-appendices.docx>

their sample to non-dummy enrollment records⁴ in the TAF annual Demographic and Eligibility file, restrict the age of enrollees to those 21 and under, and restrict their population to enrollees receiving full or comprehensive benefits.

Table 2. Identifying foster care children in TAF

Variable label	Variable name	Values to identify Foster Care Children
Eligibility group code (months 1-12)	ELGBLTY_GRP_CD_01 – ELGBLTY_GRP_CD_12	08: Children with Title IV-E Adoption Assistance, Foster Care or Guardianship Care

Comparison to external benchmark data: Summary CB-496 data on program expenditures and caseloads

All Title IV-E agencies must report financial information on a quarterly basis for the Title IV-E adoption assistance, foster care, and guardianship care programs using Form CB-496. Caseload data reported on the CB-496 includes the average monthly number of children for whom specified Title IV-E expenditures were made. Beginning in FFY 2019, the Children's Bureau has published to its website an annual FFY summary of Form CB-496 expenditures and caseloads, as reported by each Title IV-E agency; this information includes the combination of current-quarter and prior-quarter adjustment expenditures and current-quarter caseload data as presented in quarterly Form CB-496 submissions for each FFY.⁵

There are limitations to using the summary CB-496 data as a benchmark for the TAF. Because the aggregated annual caseload numbers are derived from average monthly caseload numbers, the reported numbers could over- or underestimate of the actual number of children receiving Title IV-E adoption assistance, foster care, or guardianship care, depending on the state. In addition, tribal Title IV-E agencies submit their own Form CB-496 separately from state Title IV-E agencies, and given that some tribal jurisdictions cross state geographic boundaries, it can be difficult to align tribal caseload numbers with state TAF numbers. As a result, some state CB-496 caseload numbers might not represent the exact number of children within a state's geographic boundary who are receiving Title IV-E assistance.

Comparison to External Benchmark Data: AFCARS

Two AFCARS data files can be joined and used as a benchmark for the TAF: the AFCARS foster care file and the AFCARS adoption file.⁶ The foster care file contains data elements that

⁴ TAF users may wish to exclude Demographic and Eligibility records representing enrollee IDs that are present on claims but are not included in the eligibility records submitted by the state (those with MISG_ELGBLTY_DATA_IND = 1).

⁵ The Summary Title IV-E Programs Expenditure and Caseload Data can be found at <https://www.acf.hhs.gov/cb/report/title-iv-e-programs-expenditure-and-caseload-data>

⁶ The AFCARS data used in this publication were made available by the National Data Archive on Child Abuse and Neglect, Cornell University, Ithaca, New York, and have been used with permission. Data from AFCARS were originally reported to the Children's Bureau. Funding for the project was provided by the Children's Bureau, Administration on Children, Youth, and Families, Administration for Children and Families, U.S. Department of (continued)

provide case-level information on children receiving child welfare services, including demographics, the number of previous stays in foster care, service goals, availability for adoption, dates of removal and discharge, funding sources, and information about biological and foster parents (Children's Bureau 2021a). The adoption file contains data elements on the adopted child's demographic characteristics, prior relationship with the adoptive parents, the date the adoption was finalized, the dates that parental rights were terminated, the characteristics of birth and adoptive parents, and whether the child was placed from within the United States or from another country (Children's Bureau 2021b). States are legally required to report on (1) children placed for adoption by a public child welfare agency, (2) children who have been in the public foster care system and were placed for adoption by a private agency contracted by a public child welfare agency, and (3) children in whose adoption a public child welfare agency was involved but who had not been in the public foster care system (for example, children who received Title IV-E funds for nonrecurring costs associated with adoption).

As with the summary CB-496 data, there are limitations to using the AFCARS data as a benchmark for the TAF. For example, the children and youth shown as receiving adoption assistance in the foster care and adoption files are limited to those who either received foster care services or had adoptions finalized during the reporting period. The number of children and youth reported in the AFCARS adoption file is an underestimate, for comparison purposes, of those children and youth in the TAF who have been postadoption longer (that is, were adopted in a previous year and are still receiving IV-E adoption assistance) and receiving Medicaid. There are also likely children and youth who would appear in the AFCARS foster care or adoption files but would not appear in the TAF because they were not eligible for Medicaid, or they lost Title IV-E eligibility.

Another limitation to using the AFCARS adoption file is related to how the data are generated. This is due to several factors: (1) the adoption file for a particular FFY only contains records for adoptions that occurred or were reported during that year, (2) many adoptions finalized in a FFY are not reported to AFCARS until the following FFY, and (3) children and youth who are receiving ongoing Title IV-E adoption assistance are not represented in the adoption file beyond the FFY in which their adoption was finalized and/or electronically reported. Because of these reasons, the adoption count in the AFCARS adoption file should not be considered an absolute, final count. Accordingly, some data submissions might contain data for adoptions that occurred in previous years. For example, an adoption occurring in FFY 2019 might not be reported to AFCARS until FFY 2020; in this case, the adoption would only be counted in FFY 2020, but not in any subsequent years, or in FFY 2019. In addition, as some states assign children a new AFCARS identifier when they are adopted, it is possible that some youth could be counted twice in the AFCARS data if they appeared in both the foster care and adoption files during the same year. Finally, the AFCARS foster care and adoption files do not contain records of children and youth who receive Title IV-E funded guardianship care.

Because of the aforementioned limitations, the total number of children and youth in the AFCARS foster care and adoption files represent a substantial underestimate compared with the number of children and youth receiving Title IV-E assistance in the TAF. TAF users should consider these limitations when comparing the TAF to these data sources.

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