



**Technical Bulletin #10**  
**Footnote Guidance**  
**REVISED: February, 2012<sup>1,2</sup>**

This Technical Bulletin provides information on the types of information that title IV-E agencies may wish to include in explaining their Adoption and Foster Care Analysis and Reporting System (AFCARS) data and provides the format for submitting footnotes.

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<sup>1</sup> Initial issuance date July 26, 1994, as Technical Bulletin #3, Optional Explanatory Footnotes and May 15, 1995, as Technical Bulletin #11, Questions to Guide Footnote Preparation.

<sup>2</sup> Revised March, 2000 as Technical Bulletin #3 for change in race categories, see ACYF-CB-99-01, issued January 27, 1999 and 65 FR 4019.

## I. Introduction

### A. AFCARS Background

AFCARS is designed to collect uniform, reliable information on children who are under the responsibility of the title IV-B/IV-E agency for placement, care, or supervision. The collection of adoption and foster care data is mandated by section 479 of the Social Security Act (the Act). The requirements for AFCARS are codified in Federal regulation at 45 CFR 1355.40. Effective October 1, 2009, section 479B(b) of the Act authorizes direct Federal funding of Indian Tribes, Tribal organizations, and Tribal consortia that choose to operate a foster care, adoption assistance and, at Tribal option, a kinship guardianship assistance program under title IV-E of the Act. On January 6, 2012, the Administration for Children and Families (ACF) issued an Interim Final Rule (IFR)<sup>3</sup> to implement statutory provisions related to the Tribal title IV-E program. The Federal regulations at 45 CFR 1355.40 were amended to apply the same regulatory requirements for data collection and reporting to a Tribal title IV-E agency as are applied to a State title IV-E agency.

AFCARS was established to provide data that would assist in policy development and program management. Data can be used by policymakers at the Federal, Tribal, and State levels to assess the reasons why children are in foster care and to develop strategies to prevent their unnecessary placement into foster care. Specifically, the data include information about foster care placements, adoptive parents, and length of time in foster care, and make it possible to identify trends in particular geographic areas. Also, the data enable the Children's Bureau to administer the Federal title IV-E foster care and adoption assistance programs more effectively. The Children's Bureau and ACF use these data for a number of purposes, including:

- responding to Congressional requests for current data on children in foster care or those who have been adopted;
- responding to questions and requests from other Federal departments and agencies, including the General Accounting Office (GAO), the Office of Management and Budget (OMB), the Department of Health and Human Services' Office of Inspector General (OIG), national advocacy organizations, States, Tribes, and other interested organizations;
- developing short and long-term budget projections;
- developing trend analyses and short and long-term planning;
- targeting areas for greater or potential technical assistance efforts, for discretionary service grants, research and evaluation, and regulatory change; and
- determining and assessing outcomes for children and families.

Additionally, the AFCARS data are used specifically in the

- Adoption Incentives Program;

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<sup>3</sup> 77 FR 896 (January 6, 2012)

- Child Welfare Outcomes Report;
- Child and Family Services Reviews (CFSRs);
- Title IV- E Eligibility Reviews; and
- Allotment of funds in the Chafee Foster Care Independence Program (CFCIP).

## ***B. Overview of Technical Bulletin***

A title IV-E agency may include footnotes that comment on or clarify the AFCARS data in any of its submissions. This Technical Bulletin provides suggestions for the type of information that may be covered in a footnote and provides the format for submitting footnotes. The intent of these footnotes is to provide additional information for understanding a title IV-E agency's child welfare data. The Children's Bureau will review the footnotes and include relevant information in its analysis of the data.

## **II. Footnote Guidance**

### ***A. Overview***

Footnotes can include information at the file level or at the element level. Footnotes at the file level should provide clarification or information related to the title IV-E agency's file or a general comment about the data. Footnotes with general comments should not be related to a specific data element but, rather, should be considered to be applicable to all data elements.

Element-level footnotes are associated with a specific element. For example, these may clarify certain policies, such as the title IV-E agency does not enter into voluntary agreements. In this case, the agency would include a footnote noting this policy with foster care element #25, manner of removal.

In deciding what to footnote, title IV-E agencies should follow a rule of reason and assess whether or not there are significant issues that may lead to misinterpretation of the data. Footnotes should not give the appearance of being a research finding or report a possible explanation for an occurrence in the data. For instance, a general footnote should not simply comment that "Numbers of children in care may be off because the State went on line with a new information system." The footnote should instead provide more definitive information such as "State began information system conversion one month into the AFCARS reporting period, therefore, the substitute care population reported represents an estimated 85% of children in care."

### ***B. Examples of Footnotes***

Listed in this section are examples of the two types of footnotes.

#### **The Examples Below Are For Illustrative Purposes Only:**

1. Examples of General Comment Footnotes:

- Approximately 5% (or 20) of the State's substitute care population includes children in the juvenile justice system.
- The Tribe's data was extracted from an information system that is under development.
- The State's adoption data represents approximately 90% of all adoptions finalized during the reporting period as all information from the court system had not been received at the time of data submission.

## 2. Examples of Specific Data Element Footnotes for Foster Care:

### Data element #6 (child's date of birth)

- The title IV-E agency defines the age of a child up to the age of 20.

### Data element #41 (child's current placement setting)

- Of the children identified as residing in institutional placements, approximately 80% are in emergency shelters.

### Data element #43 (child's current case plan goal)

- The State does not have a guardianship program in place.

## 3. Examples of Specific Data Element Footnotes for Adoption:

### Data element #4 (title IV-E agency involvement in adoption)

- Any record answered as a "no" is one in which the title IV-E agency completed a home study only.

## III. Footnote Record Transmission and Layout

The explanatory footnotes may be appended to the end of the required AFCARS file, or be submitted separately from the data file as an ASCII file. This file may contain one or more footnotes with general comments on adoption, general comments on foster care, specific comments on the adoption detailed data elements, and specific comments on the foster care detailed data elements. Title IV-E agencies may submit multiple footnotes in each category.

### **Every Footnote In The File Must Begin With:**

A two character header of two percent signs "%%" and

An eleven character identifier:

- Characters 1-2: Title IV-E agency two digit FIPS code.
- Characters 3-8: Report period ending date in the format: ccyymm
- Character 9: "A" for Adoption footnotes.  
                   "F" for Foster Care footnotes.  
                   "G" for Adoption Aggregate footnotes.
- Characters 10-11: The two-digit data element number reference to the detailed submission file ("00" is designated for general comments).

Examples:

"%%44199803A00" indicates that this footnote:

- is from Rhode Island ("44"),
- for the reporting period ending in March 1998 ("199803"), and
- refers to an adoption ("A") general comment ("00").

"%%56199909F08" indicates that this footnote:

- is from Wyoming ("56"),
- for the reporting period ending in September 1999 ("199909"), and
- refers to the foster care ("F") race data element #08 ("08").

NOTE: The body or text of the footnote may not exceed 240 characters and every footnote in the file must end with a carriage return/line feed.

**Table 1: Explanatory Footnote File Format Summary Table**

Each record in the footnote file should be formatted as follows:

<b>Data Element Description</b>	<b>Number of Characters</b>	<b>Allowable Values/ Format</b>
Header	2	%%
Title IV-E agency FIPS Code	2	Valid FIPS Code
Report Period Ending Date	6	CCYMM
File Reference	1	"A" for Adoption "F" for Foster Care
Data Element Number	2	00-37 for Adoption 00-66 for Foster Car
Footnote Text	Not to exceed 240	Alphanumeric
End of Record Marker	1	Carriage Return/Line Feed (CR/LF)

NOTE: Including CR/LR, each footnote record may NOT exceed a total of 254 characters.