

# FRA Secondary School Attainment Measure Roadmap & Checklist

## Step-by-Step Implementation Guide for TANF Administrators and Data Partners

As part of the Fiscal Responsibility Act (FRA) of 2023, all states are required to submit the **Secondary School Diploma or its Recognized Equivalent Attainment Rate** report annually, with the first report due on November 14, 2027. This outcome measure is intended to assist federal and state policymakers to better understand the effectiveness of TANF programs in promoting successful education credential attainment. States have some flexibility in determining the data sources used to create this report. For states planning to collect administrative records, this document is both a roadmap and a checklist to assist states with creating the report and includes additional resources. We suggest that you work through the steps in this document with your team. To find this resource online, visit the PeerTA TANF Outcomes Technical Assistance and Logistics (TOTAL) webpage ([peerta.acf.hhs.gov/total](https://peerta.acf.hhs.gov/total)).

### Reporting Deadlines

The first report, covering Fiscal Year 2025, is due November 14, 2027, and annually thereafter. The first three deadlines are noted below. Plan your data collection timelines and any data sharing agreements accordingly based on these deadlines.

Fiscal Year/ Annual Reporting Period	Due Date
FY 2025, October 1, 2024 – September 30, 2025	November 14, 2027
FY 2026, October 1, 2025 – September 30, 2026	November 14, 2028
FY 2027, October 1, 2026 – September 30, 2027	November 14, 2029

### Key Definitions

<b>Eligible Population</b>	All individuals who, in at least one reporting month while receiving TANF, were simultaneously: (1) under age 24, (2) enrolled in secondary school or an equivalency program, and (3) a Work Eligible Individual (WEI).
<b>Work-Eligible Individual (WEI)</b>	Work-Eligible Individual as defined in 45 CFR Part 261.2(n). Typically an adult or minor head-of-household who is counted in the state’s calculation of the state’s work participation rate (WPR).
<b>Diploma / Equivalent</b>	A regular high school diploma as defined in the Elementary and Secondary Education Act (ESEA) OR a state-recognized certification of completion of secondary education requirements (45 CFR 265.2(e)).
<b>Exiter</b>	An eligible individual whose family ceases to receive TANF assistance during the reporting year and remains off assistance for at least 90 days (45 CFR 265.2(c)). Date of exit is the date they were last eligible to receive assistance.
<b>Current Recipient</b>	An eligible individual who does not meet the exiter criteria in the reporting year.
<b>Reporting Period</b>	One federal fiscal year: October 1 – September 30. The measure counts attainment for the eligible population in the reporting year (and in the following year, if they exited).

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# PHASE 1 | GET ORGANIZED

## Review Key Resources

- Review key resources to understand the full scope of requirements and instructions, including:
  - [Fiscal Responsibility Act of 2023 statute](#) and [Interim Final Rule](#) (45 CFR Part 265)
  - [TANF Work Outcomes Measures Technical Resource](#)
  - [Secondary School Attainment Measure Instructions](#)

*These resources, and more, can also be found on ACF's site: [acf.gov/ofa/law-regulation/tanf-provisions-fra-2023](https://acf.gov/ofa/law-regulation/tanf-provisions-fra-2023)*

## Understand the Report

- Review the [Secondary School Attainment Measure Report Template](#) (pictured below) to understand the information you will need to collect and fill out. Note that the template is set up to calculate the rates automatically, so only items 1-5 need to be entered. The report submission will also need to include an attached description of the data sources (item 9).

TANF Secondary School Diploma or its Recognized Equivalent Attainment Rate		
1. Reporting period covered:	mm/yyyy - mm/yyyy	_____
2. Current recipient - denominator	Number of eligible individuals, current recipients who did not exit	_____
3. Exiter - denominator	Number of eligible individuals who exited during reporting period	_____
4. Current recipient - numerator	Number of eligible individuals, current recipients who did not exit, who attained diploma in reporting period	_____
5. Exiter - numerator	Number of eligible individuals who exited during reporting period, who attained diploma within 1 year of exit	_____
6. Current recipient - calculated rate	Current recipient secondary school attainment rate	_____
7. Exiter - calculated rate	Exiter secondary school attainment rate	_____
8. Total calculated rate	Combined secondary school attainment rate	_____
9. Data Sources: Attach a description of the data sources.		

## Identify Key Staff and Partners

- Assign a task lead who will own implementation of the Secondary School Attainment Measure.
- Identify all **internal** stakeholders who need to be involved.
 

*Typically includes: TANF program staff, data/IT staff, legal/policy staff, and leadership sign-off.*
- Identify potential **external** data partner(s) who will need to be engaged (expanded in **Phase 5**).
 

*Typically a State Education Agency (SEA), State Longitudinal Data System (SLDS), or Local Education Agency (LEA).*
- Build a timeline working backwards from the reporting deadline.
 

*The first report (covering FY 2025) is due November 14, 2027. Data sharing agreements and data processing can take significant time — start now.*

**QUESTIONS?**

- ➔ Remember you can always reach out to: [tanfdata@acf.hhs.gov](mailto:tanfdata@acf.hhs.gov)
- ➔ Visit the PeerTA TOTAL webpage for additional resources: [peerta.acf.hhs.gov/total](https://peerta.acf.hhs.gov/total)

## PHASE 2 | UNDERSTAND THE MEASURE: WHO COUNTS?

Before looking for data, make sure your team fully understands who is eligible to be included in the denominator and numerator. Misidentifying the eligible population is likely to be a common early error.

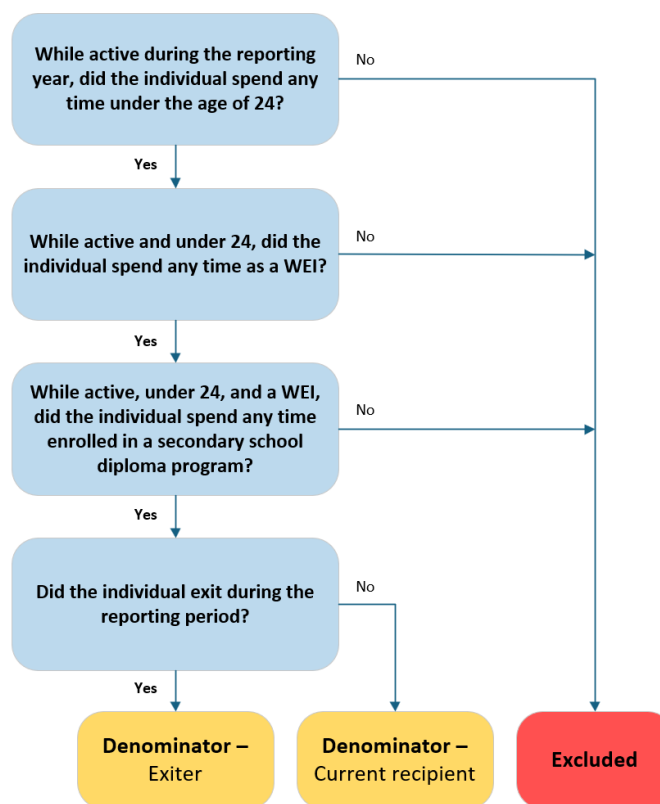
### Denominator: Who is Eligible?

An individual must meet ALL THREE criteria **simultaneously** while receiving TANF assistance in at least one month in the reporting year (see the flowchart below):

- Under age 24  
*States have flexibility in how they calculate age and whether someone meets the “less than 24 years of age” criterion based on their caseload management systems.*
- A Work-Eligible Individual (WEI) as defined in 45 CFR 261.2(n)
- Enrolled in a secondary school or recognized equivalency program  
*States offer different secondary school equivalencies – learn what is recognized in your state.*

Eligible individuals must also be categorized into two distinct groups:

- Exiter:** An individual whose family ceased receiving TANF assistance at any point during the reporting period and remained off assistance for at least 90 days. (An individual removed from the grant while the rest of the family stays on is NOT an exiter).
- Current recipient:** An individual receiving TANF in the reporting year who does not meet the definition of an exiter.

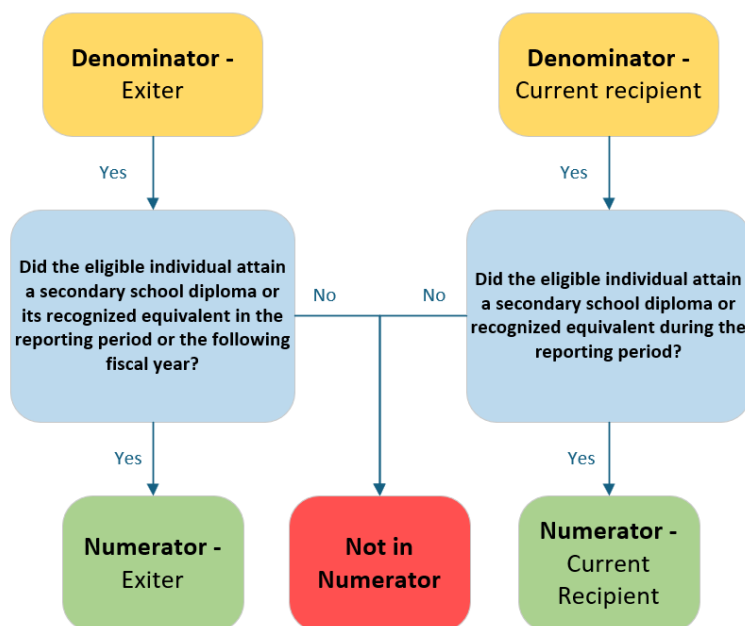


**NOTE:** Review Appendix B scenarios in the [Technical Resource](#) to make sure your team understands more complex scenarios (e.g., individual turns 24 mid-year, or individual re-enrolls in TANF).

## Numerator: Who Attained?

An eligible individual is counted in the numerator if they attained a secondary school diploma or recognized equivalent:

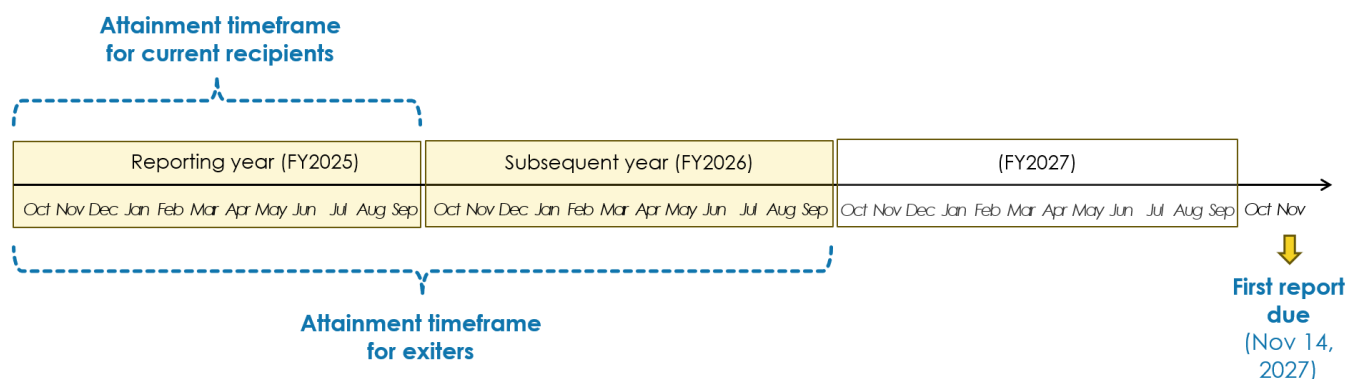
- While receiving TANF assistance in a year they were eligible, OR
- During the following fiscal year, if they exited in a year they were eligible.



## Universe

- Confirm you are using universe-level data (the entire eligible population, not a sample).
- Confirm you can track both current recipients and exiters separately. This is important because the follow-up period varies for the two groups.

See example below for the first report covering FY 2025: For current recipients, attainment is only counted in the reporting year; For exiters, attainment is counted if it occurred in the reporting year OR in the following fiscal year. (Note that attainment in either year is still counted towards the reporting year, or FY 2025, in this example).



## PHASE 3 | ASSESS YOUR INTERNAL DATA (DECISION POINT)

Determine what data your TANF system already has and what you will need to obtain externally. This section outlines two different paths, depending on the data you currently have. Answer the questions below for both current recipients and exiters and be sure to document any gaps and approaches – you will need to describe your data sources in the report submission.

### Internal TANF Data Inventory

- Do you have data to identify WEI status for all individuals?  
*Source: TANF case management system. Confirm field definitions match 45 CFR 261.2(n).*
- Do you have date of birth / age data for all individuals?  
*Confirm you can determine age in each relevant reporting month, not just at a single point in time.*
- Do you have data on enrollment in secondary school or equivalency programs?  
*This is often NOT in the TANF system – availability and completeness of this data element may vary by state. If blank or inconsistently collected, note this as a gap.*
- Do you have data on attainment of a secondary school diploma or a recognized equivalent?  
*This is also often NOT in the TANF system, or may not be complete or up to date.*
- Do you have reliable exit data (date family ceased receiving TANF)?  
*Confirm you can identify the exit and 90-day confirmation window, and that you can distinguish true TANF exits from cases where an individual is removed from the grant while the family remains active.*

### PATH A | You have complete internal data to identify the eligible population

- Generate a list of individuals who meet all three eligibility criteria simultaneously in at least one reporting month while receiving TANF (under 24 + WEI + enrolled in secondary education) and include identifying information that may be needed for your data request.
- Separate the list into: (a) current recipients and (b) confirmed exiters and note the total counts. Each individual should appear on only one of these two lists.
- Determine the data coverage period for your data request. For FY 2025 reporting:
  - For current recipients: Oct 1, 2024 – Sep 30, 2025
  - For exiters: Oct 1, 2024 – Sep 30, 2026 (need attainment data up through subsequent fiscal year)

### PATH B | You have gaps — enrollment, age, or exit data is missing or unreliable

- Identify which specific data elements are missing or unreliable.
- Check whether your state's SLDS already links TANF data with education records — this may resolve some gaps without a new data request.  
*Several states (e.g., the Minnesota Family Investment Program (MFIP)) already participate in SLDS data ecosystems. Check with your state's P-20W (pre-kindergarten through college and into the workforce) data coordinator.*
- Work with your IT/data team to determine if your TANF system can be updated to collect missing elements going forward (or to make needed elements required).
- Proceed to the next phases with **the best available population estimate**. Be transparent with your education data contact about your gaps — they may be able to help.  
*For example: include all WEIs under 24 who have not yet completed a secondary diploma as the potential eligible population, and determine whether the education data source can be used to confirm enrollment.*

## PHASE 4 | UNDERSTAND FERPA AND YOUR LEGAL AUTHORITY

The Family Educational Rights and Privacy Act, or FERPA (20 U.S.C. 1232g), governs how education records can be shared. You must have a clear legal basis before an education agency will share student-level data with you. Do this work before reaching out — it will make your initial conversation with the education agency much more productive. As an alternative, education agencies may be able to provide aggregate or de-identified data.

- Read the FERPA statute and understand the key exceptions that apply to TANF data requests.  
*Key exceptions: (1) audit/evaluation exception — sharing with state agencies conducting authorized evaluations; (2) legitimate educational interest; (3) state statute exception. The OFA [FERPA handout](#) (available on the PeerTA TOTAL webpage) summarizes allowable uses.*
- Identify the specific legal authority your state will use to justify the data request.
- Review your state's data governance policies and any state-specific education data privacy statutes.  
*These vary significantly by state. Some states have P-20W data governance boards that have their own approval process (see Minnesota example in the [September 2025 information session](#)).*
- Confirm whether your state already has a data sharing framework or master agreement between TANF and education agencies.
  - IF YES:** Proceed to amend or extend it for this purpose
  - IF NO:** Plan for a new agreement — this takes time (see Phase 6).  
*Note: Education agencies often have their own preferred data sharing agreement templates. Plan to use theirs as the starting point.*

## PHASE 5 | IDENTIFY YOUR EDUCATION DATA SOURCE AND MAKE CONTACT

**NOTE:** Education agencies are often managing many data requests. The earlier you make contact and get on their radar, the better. Expect this process to take months, not weeks.

### Identify the Right Data Source

- Determine which source(s) hold the education data you need.

Source	About	Suggested Resources
State Education Agency (SEA)	K–12 student-level data including regular HS diplomas. Contact the SEA's research or data office.	<a href="#">State Contacts   U.S. Department of Education</a>
State Longitudinal Data System (SLDS)	Links K–12, postsecondary, and workforce data. May already include your TANF data. Check with your state's P-20W coordinator. Often the preferred path if your state has one.	<a href="#">Inventory of State Data Dictionaries and Data Manuals</a> <a href="#">SLDS - Education Commission of the States</a>
Adult Basic Education / GED Programs	Essential for capturing equivalency diplomas (GED, HiSET, etc.). May be a separate data source from the SEA's K–12 system. Confirm which equivalency types your state recognizes.	<a href="#">State High School Equivalency Options</a>
Local Education Agencies (LEAs)	Data may be available at the district or regional level only (less practical for statewide analysis)— use only if SEA/SLDS routes are unavailable.	Inquire with your State Education Agency or Department of Education to learn about local options

### Identify Your Contact and Prepare for Outreach

- Find the research, data, or analytics office at your target education agency that you will reach out to.
  - Check whether your state has a P-20W council, data governance board, or interagency data committee that oversees education data access — if so, identify whether formal proposals must go through that body.
  - Before reaching out, prepare a clear written summary of your data request that covers:
    - *Who you are and your legal authority (TANF agency, FRA requirement)*
    - *What data you need (enrollment status, diploma attainment date, diploma type)*
    - *Who you need it for (estimated count of eligible individuals, with separate counts for current recipients and exiters)*
    - *The data coverage period of the request*
    - *How the data will be used, stored, and protected*
    - *That you expect a data sharing agreement will be needed*
    - *When the data will be needed by*
- See [Working with State Education Agencies or Longitudinal Data System Organizations](#) for suggested questions and topics to cover.

### Initiate Outreach

- Send an introductory email or make a call. Be specific — vague requests cause delays.
- Ask early: Does their system have a formal proposal or data request intake process? Get on their prioritization list as soon as possible.

## PHASE 6 | NEGOTIATE AND FINALIZE THE DATA SHARING AGREEMENT

**NOTE:** Data sharing agreements (DSAs) routinely take 3–12 months to finalize. Start this process as early as possible. Education agencies typically prefer to use their own DSA template — plan to work from theirs.

- Request the education agency's standard data sharing agreement template.
- Involve your agency's legal counsel from the start.
- Confirm the DSA includes all required elements:
  - Parties involved and data ownership
  - Specific data elements to be shared and file format
  - Legal basis for sharing (FERPA exception or state statute citation)
  - Authorized uses of data — confirm it covers the FRA reporting purpose
  - Data security protocols (encryption, secure transfer method, storage requirements)
  - Who can access the data (named individuals or roles)
  - Data transfer schedule and process
  - Data retention and destruction timeline
- Complete legal review by both agencies before signing.
- Confirm approval by any required data governance bodies (e.g., P-20W council, SLDS board).
- Retain a signed copy of the executed agreement. You will need to describe your data sources in the FRA report submission.

## PHASE 7 | RECEIVE, VALIDATE, AND DOCUMENT THE DATA

### Upon Receipt

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- Confirm you received all requested data elements for all requested individuals (all needed columns and rows in the case of individual-level data, and all needed counts in the case of aggregate data).
- Confirm the data cover the correct time frame (for the FY 2025 reporting period: Oct 1, 2024 – Sep 30, 2025 for current recipients, and Oct 1, 2024 - Sep 30, 2026 for exiters).
- Confirm the file format and record count match what was agreed upon in the DSA.
- Confirm you have documentation from the education agency on their matching process and results — e.g., how many of your submitted individuals matched in their system, what match rate to expect.

*It may be helpful to request a list of the individuals that did not match in case you are able to explore an additional data source for the unmatched individuals, such as sending a survey.*

### Quality Checks for Aggregate Data

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- Confirm the counts seem reasonable (relative to each other and to your expectations) and that adding them up does not result in implausible totals.

*For instance, the number that attained a diploma should not be greater than the number that enrolled; the total number that attained a diploma should not be greater than the number of individuals provided for matching.*

### Quality Checks for Individual-Level Data

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- Link the education data to your TANF case management data for your eligible population and check the match results.
- Check for missing data or blank fields in key variables (diploma date, diploma type, enrollment status).
- Check for implausible values (e.g., diploma attainment before enrollment, dates outside the reporting window).
- Where possible, cross-check education data against self-reported information in the TANF case management system.
- Confirm all diploma types received are recognized under your state's definition of secondary school diploma or equivalent.

*Your state may recognize GED, HiSET, standard adult HS diploma, K–12 credit diploma, and others — confirm each type received is included or excluded correctly.*

### Documentation

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- Document your final data acquisition approach.
- Document all data issues found and how they were resolved, such as missing data.
- Prepare the data source description you will attach to your report (required as part of the submission).

## PHASE 8 | POPULATE AND SUBMIT THE REPORT

When all data has been received, validated, and processed, proceed to completing and submitting the report!

- Construct the denominator for both current recipients and exiters: this would be a total count of all individuals who were simultaneously under 24, WEI, and enrolled in secondary school in at least one reporting month during the federal fiscal year (FY 2025, for the first report).
- Construct the numerators for both exiters and current recipients: all individuals in the denominator who attained a diploma in the reporting year, OR in the subsequent fiscal year (if they exited from TANF in the reporting year).
- Using the [Report Template](#), fill in the reporting period and the numerator and denominator counts. The rates will be automatically generated in the report once the counts are entered.
- Finalize the data source description that will be included as part of your report submission.
- Submit the first report (covering FY 2025) by November 14, 2027 via the [TANF Data Portal](#).

### QUESTIONS?

- ➔ Remember you can always reach out to: [tanfdata@acf.hhs.gov](mailto:tanfdata@acf.hhs.gov)
- ➔ Visit the FRA website to view key resources: [acf.gov/ofa/law-regulation/tanf-provisions-fra-2023](https://acf.gov/ofa/law-regulation/tanf-provisions-fra-2023)
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