

NATIONAL CHILD ABUSE AND NEGLECT DATA SYSTEM (NCANDS)

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT SUBMISSIONS

A. JUSTIFICATION

The Children's Bureau of the Administration of Children and Families in the Department of Health and Human Services collects national child abuse and neglect statistics through the National Child Abuse and Neglect Data System (NCANDS). The Department is seeking re-approval of the data collection instruments, which are used to collect these data. The current approval expires on October 31, 2006.

In 1990, the initial design of NCANDS specified that NCANDS would be phased-in through two components—an aggregate data collection survey, the Summary Data Component (SDC), and a case-level data collection effort, the Detailed Case Data Component (DCDC). This design was based upon the involvement of almost all States in the planning and design phases of NCANDS. At that time, it was fully recognized that case-level data would be most useful, but also that most States did not have the capacity to provide such data. To obtain national statistics, NCANDS was designed to be composed of an aggregate and a case-level component.

Both components have been in place for several years. Most recently, on November 6, 2003, approval from the Office of Management and Budget (OMB) was received to collect the NCANDS data through the DCDC and the SDC (Control No. 0980-0229), through October 31, 2006.

Previous approvals for the SDC were obtained in 1991, 1993, 1996, and 1998 (Control Number 0980-0229). The DCDC was approved in 1994 and 1997 (Control Number 0980-0256). In 2000 and 2003, both instruments were re-approved in one action (Control Number 0980-0229).

1. The Need for Information Collection

The Child Abuse Prevention and Treatment Act as amended (CAPTA) [42 U.S.C. 5101 et seq., 42 U.S.C 5116 et seq.] has two sections related to NCANDS. (See attachment I-A, or http://www.acf.hhs.gov/programs/cb/laws_policies/cblaws/capta03/index.htm.) Section 103 [42.U.S.C 5104], National Clearinghouse for Information Relating to Child Abuse, was amended in 1988 and requires that the Secretary:

- (C) Develop a Federal data system involving the elements under subsection (b) which to the extent practicable coordinates existing Federal, State, regional and local child welfare data systems, which shall include—

- (1) Standardized data on false, unfounded, or unsubstantiated reports; and
 - (2) Information on the number of deaths due to child abuse and neglect;
- (D) Through a national data collection and analysis program and in consultation with appropriate State and local agencies and experts in the field, collect, compile, and make available State child abuse and neglect reporting information, which to the extent practical, shall be universal and case specific and integrated with other case-based foster care and adoption data collected by the Secretary.

Section 106 [42 U.S.C. 5106a], Grants to States for Child Abuse and Neglect Prevention and Treatment Programs, as amended in 1996, requires that each State submit an annual data report to the Secretary.

(d) ANNUAL STATE DATA REPORTS.—Each State to which a grant is made under this section shall annually work with the Secretary to provide to the maximum extent practicable, a report that includes the following:

- (1) *The number of children who were reported to the State during the year as abused or neglected.*
- (2) *Of the number of children described in paragraph (1), the number with respect to whom such reports were—*
 - (A) *substantiated;*
 - (B) *unsubstantiated; or*
 - (C) *determined to be false.*
- (3) *Of the number of children described in paragraph (2)—*
 - (A) *the number that did not receive services during the year under the State program funded under this section or an equivalent State program;*
 - (B) *the number that received services during the year under the State program funded under this section or an equivalent State program; and*
 - (C) *the number that were removed from their families during the year by disposition of the case.*
- (4) *The number of families that received preventive services from the State during the year.*
- (5) *The number of deaths in the State during the year resulting from child abuse or neglect.*
- (6) *Of the number of children described in paragraph (5), the number of such children who were in foster care.*
- (7) *The number of child protective services workers responsible for the intake and screening of reports filed in the previous year.*
- (8) *The agency response time with respect to each such report with respect to initial investigation of reports of child abuse or neglect.*
- (9) *The response time with respect to the provision of services to families and children where an allegation of abuse or neglect has been made.*
- (10) *The number of child protective services workers responsible for intake, assessment, and investigation of child abuse and neglect*

reports relative to the number of reports investigated in the previous year.

- (11) The number of children reunited with their families or receiving family preservation services that, within 5 years, result in subsequent substantiated reports of child abuse and neglect, including the death of the child.*
- (12) The number of children for whom individuals were appointed by the court to represent the best interests of such children and the average number of out-of-court contacts between such individuals and children.*

(e) ANNUAL REPORT BY SECRETARY.—Within 6 months after receiving the State reports under subsection (d) of this section, the Secretary shall prepare a report based on information provided by the States for the fiscal year under such subsection and shall make the report and such information available to the Congress and the national clearinghouse for information relating to child abuse and neglect.

The 2003 amendments to CAPTA, under the Keeping Children and Families Safe Act of 2003, added two additional data elements to the above list. The Children's Bureau has decided to not incorporate these data elements into the NCANDS at this time.

In 1988, in response to the 1988 amendments to CAPTA, the National Center on Child Abuse and Neglect, with the participation of the States, designed the NCANDS. Implementation began after the initial approval of OMB in 1991. The voluntary reporting of child protective services data has been strongly supported by the States since its inception. Each year, all or almost all States have provided either the aggregate data and/or the case-level data.

In 1998, after consulting with the States, the Children's Bureau, which had become responsible for the collection of NCANDS data, incorporated the reporting requirements of the 1996 amendments to CAPTA, with the approval of OMB. In 2000, after testing these elements in the SDC, the Children's Bureau, again with the approval of OMB, included the requirements into the DCDC. Extensive consultation was conducted with the States, which supported the consolidation of all requirements into the DCDC. Revisions were made to eliminate any inconsistencies between the two components. Thus, submission by States of both instruments was no longer necessary. States could meet all reporting requirements by submitting the expanded DCDC, which included the case-level file, the Child File, and an aggregate data file, the Agency File.

Starting with 2000 data, the Department has relied primarily on the case-level data from the States. This has increased the Department's ability to report on many aspects of child maltreatment. Forty-five States submitted the Child File for Federal fiscal year (FFY) 2004, and 6 submitted the SDC. (Puerto Rico was unable to complete its submission.) It is anticipated that 49 States will submit the Child File for **FFY 2006**, and the remaining will submit the SDC.

2. The Use of the Data

Collecting and reporting NCANDS data have both been very successful.

- Each year, 48–51 States, including the District of Columbia, have submitted data to NCANDS. Technical assistance is provided each year to improve the data quality.
- Under the National Center on Child Abuse and Neglect (NCCAN) and subsequently the Children’s Bureau, there have been 15 annual reports. In April 2006, the 15th annual report, *Child Maltreatment 2004*, was released in conjunction with Child Abuse Prevention Month. (See attachment I-B or http://www.acf.hhs.gov/news/press/2006/Child_Maltreatment_2004.htm.)
- Approximately 6,000 copies of the annual report are disseminated each year. The annual reports from the most current to the 1995 report also are available through the ACF web site. (See attachment I-C or http://www.acf.hhs.gov/programs/cb/stats_research/index.htm#can.)

The NCANDS has been the primary source of national statistics on child maltreatment since its inception. It is widely disseminated and quoted in other publications. If the term NCANDS is entered into an Internet search engine, such as Google, more than 35,000 citations are found.

NCANDS serves as the main source of national child maltreatment data for the Federal government, as well as policymakers, researchers, and advocates. Some examples of recent publications are as follows:

- The U.S. Bureau of the Census includes NCANDS data in its annual report, *Statistical Abstract of the United States*. (Available at <http://www.census.gov/prod/www/statistical-abstract.html>.)
- The Children’s Bureau uses NCANDS data to report on outcomes related to child abuse and neglect under the Government Performance and Reporting Act (GPRA) and the Program Assessment Rating Tool (PART). The NCANDS data are used to support PART reporting on the Child Abuse and Neglect State Grant and the Community-Based Grants for the Prevention of Child Abuse and Neglect, both funded under CAPTA.
- The Department uses data from NCANDS in the annual child welfare outcomes report to address the context of child abuse and neglect as well as two outcome measures. The most recent report is for the year 2002, *Child Welfare Outcomes 2002*. (See Executive Summary in attachment I-D or <http://www.acf.hhs.gov/programs/cb/pubs/cwo02/index.htm>.)

- Data from NCANDS are used in the Child and Family Services Reviews, conducted by the Children's Bureau, as required by the Adoption and Safe Families Act. (See sample Safety Assessment Profile, attachment I-E.)

NCANDS data are the primary source of State statistics on child abuse and neglect and are cited in the academic literature as well as in annual publications by such organizations as the Children's Defense Fund, the Child Welfare League of America (CWLA), and numerous other organizations and associations. CWLA has developed an Internet site, (<http://www.cwla.org/ndas.htm>), for data on child welfare and much of the data on that site are from the NCANDS.

In addition there has been a growing use of NCANDS data by researchers, policymakers, and advocates. The most recent report of *Child Maltreatment 2004* describes several research efforts using NCANDS data.

Data from NCANDS have also been used to support other Federal research efforts, thus using existing data in an efficient and effective manner. For example, the design of the National Study of Child and Adolescent Well-Being used NCANDS data to design its sampling strategy and to confirm its weighting design. The fourth National Incidence Study (NIS-4) has also relied upon NCANDS data in developing its sampling framework.

3. Use of Improved Information Technology

The NCANDS supports the use of electronic submission of responses. These methods have been tested with the States and have been chosen to reduce the burden of the States in responding to the NCANDS. States are also provided with a runtime version of the validation programs so that they can validate their data prior to submission, if they wish.

The main data collection component of NCANDS is the Detailed Case Data Component which consists of the case-level data file, the Child File, and the aggregated data file, the Agency File. (Documents describing this component of the DCDC are submitted in attachments II-A, -B, and -C.) States that are unable to submit a case-level data file, submit the Summary Data Component (SDC). (See attachment II-D.) A glossary of terms is provided in attachment II-E.

The case-level child data records are transmitted electronically in American Standard Code for Information Interchange (ASCII) format. States either send their encrypted data via the Internet, using a secured system, or via an e-mail of zipped files. States are able to choose the most convenient method of data transmission. Once the data files are formatted consistently, they are processed through NCANDS edit and quality control programs. Errors and inconsistencies in the data transmission are communicated to each State and usually resolved with minimal effort. If necessary, the State resubmits its data. Communication with each State is conducted via e-mail, telephone, and regular mail.

The Agency data are submitted to NCANDS in electronic file format. The aggregate data of the Agency File are entered into a single Microsoft Access file via an automated data collection tool provided to the State by NCANDS. This runtime version of the Visual Basic tool is installed by the State using the standard Windows Setup installation process. After the aggregate data have been entered into the tool by the State, the tool compresses the Access file into a smaller standard Windows CAB file, similar to a zipped file. The State then submits the CAB file to the NCANDS Technical Team via e-mail attachment or a secured Internet system. The State has the ability to resubmit the data file in this same manner, if needed. The SDC data are submitted in a manner similar to the Agency File data.

States are provided with annual updates of the validation and the data collection programs, so that they can validate their Child File data prior to submission and enter their Agency and SDC data. The primary tools for analyzing and presenting the data are SPSS for Windows (formerly the Statistical Package for the Social Services) and Excel. All tables are finalized using Excel. It should be noted that NCANDS has been consistent in following OMB Circular A-30 concerning the recommended use of off-the-shelf software.

States have reported that they have no difficulty in either submitting data or receiving review of their submissions from NCANDS.

NCANDS has also completed and submitted the Risk Assessment/NIST-Self Assessment and Key Personnel Contact Information forms to the Information Technology Security Unit (ITCU) of the ACF.

4. Efforts to Reduce Duplication

Currently there are no similar or duplicative efforts related to collecting data on maltreatment. The Children's Bureau data collection efforts are recognized as being the primary source of national child protective services statistics. Over the past several years, study designs that might have resulted in duplication have been discussed and reviewed. Through collaboration within the Department and with external agencies, duplication has been avoided. Some examples are provided below.

- Each year the Child Welfare League surveys its members on various topics related to child welfare services. The League survey does not collect any data that are collected by the NCANDS.
- The National Indian Child Welfare Association (NICWA) has completed a 3-year grant from the Children's Bureau that included piloting an effort to help American Indian communities to develop a system for reporting on child abuse and neglect. The pilot system parallels the NCANDS to the extent

appropriate for the tribes. Four tribes participated in this project. At this time, there are no plans for widespread implementation. This effort is not duplicative to NCANDS because tribes do not report directly to NCANDS.

- The Centers for Disease Control and Prevention (CDC) has launched a pilot program to improve the surveillance of child abuse and neglect in emergency rooms and hospitals. Pilot sites include California, Michigan, Missouri, and Rhode Island. This effort is not duplicative in that NCANDS collects data from State child welfare agencies, rather than specific hospitals. NCANDS is working with the CDC to maximize commonality of definitions and instructions.
- The Adoption and Foster Care Analysis and Reporting System (AFCARS), mandated by 42 U.S.C. 679. Regulations (45 CFR 1355), set forth the requirements of section 479 of the Social Security Act for the collection of uniform, reliable information on children who are under the responsibility of the State title IV–B/IV–E agency for placement, care, and adoption. AFCARS is designed to collect uniform information on all children under the authority of the State title IV–B/IV–E agency, who are in foster care or who are adopted.

Section 103 of CAPTA, as amended, requires that child abuse and neglect reporting information, to the extent practicable, be integrated with case-based foster care and adoption data being collected by the Secretary. The two data collection efforts are distinct in term of the populations that they address. Nevertheless, terms used in both data collection systems are commonly defined. For example, both the AFCARS and the NCANDS use the same definitions for the race and ethnicity codes. During the initial design of NCANDS, specific fields were defined using the AFCARS definitions. In support of the goal of integration, the data collection period for NCANDS was changed in 2003 to the FFY, the same as AFCARS. The AFCARS ID field was added to NCANDS to provide a means of linking the two data sets in the future.

One area of some overlap between AFCARS and NCANDS has been the data elements pertaining to removal from the home. The NCANDS requests information as to whether a child has been removed as an immediate consequence of a report related to abuse or neglect. This request is in conformity with the 1996 amendments to CAPTA, which included removal from home as one of the data items to be reported by States annually in relation to the disposition of the investigation. The removal data collected through NCANDS are likely to be a subset of the more detailed placement data required by AFCARS. The collection of placement data in this rather basic form has been consistently supported by the States as an important outcome of case disposition, and States have requested that the data element be retained in NCANDS.

5. Impact upon Small Businesses and Other Small Entities

The proposed data collection does not involve small businesses or other small entities. Data will be submitted only by State child welfare agencies.

6. Consequences to Federal Program and Policy Activities of Less Frequent Data Collection

Annual data collection is the minimal frequency that will permit meaningful program and policy activities to be carried out. Administrative and legislative actions regarding the problem of child abuse and neglect require the annual collection of data. Several annual reports, including the *Annual Report on Child Welfare Outcomes* mandated by section 203 of the ASFA, depend upon NCANDS data. Furthermore, section 106 of CAPTA, as amended, requires an annual report of certain data.

Annual data collection has been supported by the States for the following reasons.

- Once the State data system is programmed to submit the case-level data, annual extraction is a minimal burden.
- Annual data collection enables a State to maintain the interest, commitment, and expertise necessary for participation. Less frequent collection may result in increased burden due to the need to retrain staff.

7. Discussion of Special Data Collection Circumstances

Special circumstances are discussed below.

- *Report Data More Often than Quarterly.* There are no circumstances that could result in the data needing to be collected more frequently than quarterly. The proposed schedule of data submission is once a year.
- *Requiring Response in Less than 30 Days.* There are no circumstances that could result in a State needing to respond in less than 30 days. An annual date of submission has been established as March 31. States are given 90 days advance notice of this date.
- *Requiring Respondents to Submit More than One Original and Two Copies.* States are required to submit only one set of data to the NCANDS.
- *Requiring Respondents to Maintain Records for More than 3 Years.* Only data for a given data collection year are required. Because States derive their data

from administrative databases, their source data may still be maintained for State purposes. Furthermore, NCANDS archives each State's submission and can provide the State with a specific prior data submission, if needed.

- *In Connection with a Statistical Survey.* These data are not being collected as part of a statistical survey.
- *Use of a Statistical Data Classification that Has Not Been Approved by OMB.* This data collection does not require the use of statistical data collection.
- *Pledge of Confidentiality.* To ensure the confidentiality of the Child File data, each State encrypts its identifiers. No actual case or individual identifiers are submitted. No data that could identify a person such as name, address, or Social Security number, are collected. Each State assures that its data meet a standard of encryption before the data are released for public use through the National Data Archive on Child Abuse and Neglect, which is funded by the Children's Bureau.
- *Requiring Respondents to Submit Trade Secrets or Other Confidential Information.* The NCANDS does not collect any data related to trade secrets. No identifying data on any individual are collected.

8. Publication in the Federal Register and Consultation Efforts with the Public

The Children's Bureau has engaged States and other interested parties in discussing improvements to the NCANDS through many venues. Each year a State Advisory Group Meeting of approximately 20 States is held in the summer, and a NCANDS State Technical Assistance Meeting of all State representatives is held in the fall or winter. (See attachment I-F.) In addition, candidate improvements are discussed with other persons in conferences such as the annual Child Welfare Data Conference, the annual Child Welfare League of America conference, and the bi-annual National Conference on Child Abuse and Neglect.

A Federal Register announcement soliciting comments on renewing approval for the collection of NCANDS data was published on February 15, 2006 (pp 7970-7971). A copy of this announcement is attached. (See attachment I-G.) All States were informed of the announcement. No comments were received. States have continued to be supportive of NCANDS. By mid-April, nearly 40 States had submitted data for the 2005 reporting year. This is an improvement in timeliness from past years and serves as an indication of the State voluntary support for NCANDS.

9. Payment to Respondents

No payment to respondents is required as part of this data collection process.

10. Assurance of Confidentiality

As no individual is identified in the data collection process, no assurance of confidentiality is supplied. States are responsible for completely encrypting the record identification numbers. Technical assistance is provided to support them in instituting an encryption process, but the final algorithms are held only by the State.

11. Questions of a Sensitive Nature

The data collection instruments do not collect any data of a sensitive nature.

12. Burden Estimate

The annual burden estimate is shown below.

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
DCDC, includes the Child File and the Agency File	52	1	108	5,616
Summary Data Component	3	1	32	96

These estimates are premised on the expectation that 49 States in will use the Child File and the Agency File the first year, and 52 States (including the District of Columbia and Puerto Rico) in the second and third year. The estimates include consideration that most States will be able to use their existing programs to complete the annual submission, but that they may undertake to modify their programs periodically. It is expected that three States will use the Summary Data Component for the first year of this approval period. (Since the first Federal Register Announcement on February 15, 2006, we have learned that only three States instead of the originally estimated four States will be submitting the SDC.)

These estimates are based on States' prior experience in reporting data to the Child File, Agency File, and the Summary Data Component. Many States required only 32 hours to submit the DCDC Child File, while other States include reprogramming to improve their submissions. Because the States have experience with submitting the SDC file, the burden has remained constant for several years. The annual estimate is 5,712 hours (see above chart).

The annual burden is based upon an average hourly salary of \$39.00 for State programmatic staff and \$58.00 for State IT staff. It is estimated that an average of 1,942 hours will be spent by programmatic staff at a cost of \$75,738 and an average of 3,770 hours will be spent by IT staff at a cost of \$218,660 for a total cost of \$294,389.

13. Annual Cost

Since the NCANDS data collection effort depends upon the State administrative information systems, most States do not incur special data collections costs. Most of the data collected are standard data used by the agency. Operating costs of the information systems are part of State agency operations, and are not maintained solely for the purpose of submitting data to NCANDS.

However, the three States that will convert from the SDC to the Child File during the next 3 years may contract with their systems vendor to program the syntax required to submit their Child Files. This would be a one-time cost. It is estimated that each State may incur approximately 200 hours of programming time at \$72 an hour. This one-time cost for the three States would approximate \$43,200. Another eight States may need additional contractor assistance as they modify their programs for their changing IT environment or to add additional information to their databases. This is estimated at 120 hours of programming time at \$72 per hour for a total of \$69,120. The total costs incurred by the States would be \$112,320.

The estimate of \$112,320 is entered as \$112 on Form 83-I which asks for the costs in thousands; the estimate of \$106,400 is entered as \$106 on Form 83-I. The difference of \$5,920 is entered as \$6.

14. Annual Cost to the Federal Government

The annual cost to the Federal Government is shown in the following table.

AGENCY	YEAR 1	YEAR 2	YEAR 3	AVERAGE
Children’s Bureau	\$ 160,000	\$ 165,000	\$ 170,000	\$ 165,000
Contractor Staff	\$1,283,105	\$1,341,961	\$1,385,922	\$ 1,336,996
Total	\$1,443,105	\$1,506,961	\$1,555,922	\$1,501,996

The above costs are based upon the use of contractor staff to collect, validate, process, and analyze the Child File, Agency File, and the SDC data, as well provide briefings and prepare the annual report. In addition, contractor staff support other Departmental data reporting initiatives, including the Child and Family Services Reviews and the annual report on child welfare outcomes. Contractor staff also provide technical assistance during validation of the files to correct any errors and hold one annual meeting of State Advisors and another annual meeting of all States with the objective of improving the data quality. Federal staff direct and monitor all efforts.

15. Reasons for Any Changes

The burden estimate for NCANDS is less than the burden estimate for 2003-2006 due to the States increased familiarity with NCANDS. The burden estimate for the prior period was 6,068 hours, while the burden estimate for this period is 5,712. In addition, no changes are being requested.

The estimated cost of State contractor staff has increased slightly from \$106,400 to \$112,320. This is due to increases in costs and ongoing changes in State information systems.

16. Plans for Tabulation, Statistical Analysis, Publication, and Time Schedule

The highlights of the annual data collection schedule are listed below.

December 31	Send out requests for data.
March 31	All data submissions due.
September 31	Validation cycle completed including any data resubmissions.
April 1	Annual Report published.

17. Display of the Expiration Date

The expiration dates will be displayed on the data collection instructions and instruments.

18. Exceptions to the Certification of Paperwork Reduction Act

No exceptions to the above certification are being sought.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

1. Sampling

No sampling methods will be applied to this data collection program. Variation among States and the need to provide State-level data make sampling an inappropriate approach.

2. Sampling Procedures

Not applicable.

3. Response Rate

Not applicable.

4. Tests of Procedures

No pilot testing was required as no changes are being requested. No testing of sampling has been done, because all States are encouraged to participate in the NCANDS.

5. Contact Individuals

The person in the Children's Bureau responsible for NCANDS is:

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