

**Application for Renewal of the *National Extranet Optimized
Runaway and Homeless Youth
Management Information System (NEORHYMIS) Version 2.0*
OMB # 0970-0123**

Supporting Statement

**Family and Youth Services Bureau
Administration on Children, Youth and Families
Administration for Children and Families
U.S. Department of Health and Human Services**

June, 2007

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A. Justification

1. Circumstances that Make the Collection of Information Necessary: The Runaway and Homeless Youth Act (RHYA), as amended by Public Law 106-71 (42 U.S.C. 5701 et seq.), mandates that the Department of Health and Human Services (HHS) report regularly to Congress on the status of HHS-funded programs serving runaway and homeless youth. Organizations funded under the Runaway and Homeless Youth (RHY) program are required by Section 312 (b)(7) of the Statute to meet several data collection and reporting requirements. These requirements include maintenance of client statistical records and submission of annual program reports regarding the characteristics of the youth and families served and the services provided to them. (Attached as Exhibit 1 are the relevant sections of the statute and regulation mandating the collection of information.) The October, 2003, reauthorization of the Act maintained the requirements as described in the standing legislation.

The Reauthorization also requires that HHS (1) report on promising practices in preventing youth homelessness and (2) evaluate the homelessness prevention and intervention effectiveness of the Transitional Living Program (Part B of the Act). RHYMIS data is central and critical to both mandates.

The data from the National Extranet Optimized Runaway and Homeless Youth Management Information System (NEO-RHYMIS) support the grantee organizations as they carry out a variety of integrated, ongoing responsibilities and projects.

2. Use of Data: NEORHYMIS data is used by Federal and grantee staff responsible for planning, funding and implementing projects that assist runaway and homeless youth. Specific organizations include: FYSB and its Regional outstations; the ACF Office of Planning, Research and Evaluation, Basic Center Program (BCP), Transitional Living Program (TLP), and Street Outreach Program (SOP) grantees; HHS research, evaluation and support contractors; and RHY Training and Technical Assistance providers. Additionally, NEORHYMIS is the source for the data contained in the *Biannual Report to Congress on the Youth Programs of the Family and Youth Services Bureau*, mandated by RHYA and the ACF Annual Performance Plan and Performance Reports for the President's Performance Budget. The data is requested from time to time by Congressional staff, officials from State and local levels of government, researchers, and practitioners, within and beyond the RHY community of grantees.

NEORHYMIS data supports several integrated, ongoing responsibilities and projects, including legislative reporting requirements, planning and public policy development for runaway and homeless youth programs, accountability, monitoring, program management, research, and evaluation. The information collected through NEORHYMIS also has a significant role in supporting the requirements and needs of the RHY projects, including reporting requirements, research and evaluation, monitoring, program management, and providing documentation in support of applications for funding

During late 2006, FYSB analyzed the complete records of all youth who entered and exited the TLP during FY2004-2006. The analysis examined the characteristics and exit outcomes of all youth (particularly the precarious exits of some who returned to the street), but focused on drop

outs and expellees. It established factors that make it easier to identify youth at risk for failing their TLP experience and exiting prematurely and identified a clearly apparent causal factor relating to youth who exit dangerously into the street.

3. Use of Improved Information Technology to Reduce Burden: NEORHYMIS, utilizes commercially available relational database software (MS Access) that runs on standard personal computers. NEORHYMIS can operate effectively on a single machine or, if the grantee has several computers, the machines can access a common database via a local area network (LAN). By using the NEORHYMIS, grantees have immediate use of the data required to plan, administer, report, and evaluate their programs.

Grantee staff directly enter the data into the automated system at the grantee site. NEORHYMIS reads and validates information as it is entered. The grantee can generate various reports for use by local management, administrative and technical staff. Semi-annually, the grantee uses automated functions in NEORHYMIS to download the data onto a diskette and then sends the diskette to FYSB's contractor, or they may electronically submit the data via email for integration into the national database maintained by the contractor.

Prior to FY 2000, RHYMIS reporting requirements were ~~overly~~ complex and burdensome for the nature of the program. The simplifications and streamlining incorporated in the currently approved version have dramatically improved the response rate. Between 99 and 100% of the FYSB RHY grantees (who number between 600 and 700 in a given year) consistently as required. That response rate has continued unabated every year since the original instrument and design improvements. Many grantees also have stated they find the data not only easier to provide, but useful for their own needs as well. It has been the experience of users that formal training is virtually unnecessary since the simplicity of the product, its help features, and expert help desk assistance (provided by FYSB's contractor) are all the instruction required.

4. Efforts to Identify Duplication: There are no other sources of information available to be reported to HHS on runaway and homeless youth treated at RHY centers or anywhere else, for that matter. NEORHYMIS does not duplicate any existing required data. NEORHYMIS is the only uniform process that which results in accurate, timely and consistent information being received by the HHS on the number, composition and characteristics of runaway and homeless youth served by the RHY programs, in support of reporting requirements mandated by Congress in the RHY Act.

Currently, there are some youth services information management systems operating at the regional, state, and local levels. These systems, however, are not fully compatible with each other or with Federal data collection efforts, and are not capable of being compiled, as they currently stand, into one national database. However, NEORHYMIS is able to accept properly formatted and defined data from such systems. Several such situations have been effectively solved between the FYSB contractor and the IT manager of the local or state system, and these systems have been conveniently submitting their data to FYSB's contractor, which is able to read them into the NEORHYMIS format.

NEORHYMIS addresses the issue of data duplication on a number of levels:

1. NEORHYMIS collects information about programs and youth only once. Only changes in the status of the grantee program or in the status of a youth require the new information. NEORHYMIS is designed to allow the grantee to edit and integrate new information with existing information. These edit and integration features minimize data collection, data entry, and reporting burden.
2. Since NEORHYMIS supports the BCP, TLP, and SOP in the same software package, a community agency that receives funding under more than one of these RHY programs will have to complete information on its agency only once.
3. NEORHYMIS is designed to assist the RHY grantees in meeting other reporting requirements and information needs. These include reporting to other funding sources and documenting services for licensing requirements. As noted above, it is easy for a grantee to indicate that a particular caseload record, utilizing all or some of the NEORHYMIS elements, is a “non-FYSB” youth, and NEORHYMIS treats that record as such, and does not include it with the FYSB records during data transfer.

5. Methods to Minimize Burden: The burden reduction between the old RHYMIS and the first streamlined version (RHYMIS-LITE) was substantial (e.g., 227 questions formerly in RHYMIS were reduced to about 70 in RHYMIS-LITE. NEORHYMIS preserves all the content and functional simplification achieved by RHYMIS-LITE, including the user-friendly “look and feel.”) Mindful of the need to free-up youth workers from reporting so they can focus on young people, when FYSB created the proposed content of NEORHYMIS, it deleted some sections of RHYMIS-LITE that were not essential to its utility. The few changes introduced into this renewal application, one of which has already been approved by OMB (but not yet implemented pending this application for clearance) as a “small change,” are discussed in section 8. They were carefully selected and for the most part originated in suggestions and needs of RHY users and technical assistance providers over recent years. In the manual version submitted for clearance at this time, we have added clarifications, information, and explanatory text in the manner of help screens and messages. These also appear in the software and will improve ease of use as well as accuracy of response.

6. Consequences to Federal Programs or Policy Activities

6a. If the Collection of Information is not Conducted: HHS cannot fulfill its obligation to effectively serve the runaway and homeless youth population in the United States, nor report meaningful and reliable information to Congress about the extent of this problem or the effectiveness of various methodologies designed to provide assistance to this population, without access to timely and accurate information. To be of any value, this information must include specific data elements that are defined in a consistent manner and collected and reported using standard procedures. NEORHYMIS defines the required data and provides the required procedures and reports.

Grantees currently use the data in justifying applications for grants, not only when they re-compete for FYSB funding, but for other programs serving at risk youth.

6b. If the Information is Collected Less Frequently: Using NEORHYMIS, grantees submit youth information on a semi-annual basis to Washington. The grantees collect youth information each day as a matter of course in their documentation and case management processes. Grantees enter this information into NEORHYMIS periodically, depending on their individual operating procedures. Since FYSB uses the data as mandated in annual reporting to Congress under GPRA and bi-annual reporting under RHYA, the data must be collected on an annualized basis. Semiannual reporting allows for data analysis, quality review and mid-year corrections that might not take place on a timely basis if submissions were less frequent. Grantees are better off entering the data as they obtain it or soon after, to ensure it is not lost or disorganized. They can access NEORHYMIS for data entry, review, and editing at any time. The semi-annual submission is a mostly automated process that requires little labor. Most of the users' work in operating NEORHYMIS involves case data entry on an ongoing basis. Aggregating this youth information on less than a semi-annual basis will delay the grantees' ability to benefit from the information contained in the national database, to identify how closely their own clients reflect the national RHY profile, and to develop programs that most effectively meet their clients' needs.

Collecting and aggregating youth information on a semi-annual basis assures data quality and correction of significant anomalies, while reporting it annually matches the Congressional requirements and enhances FYSB's ability to react to changes and emerging trends in the field and address them in a timely manner. By having the grantees submit youth data to Washington mid-fiscal year and at the fiscal year's end, FYSB will be able to: identify problems that require intervention, monitor grantee compliance with appropriate legislation, and to meet other responsibilities. These responsibilities also include developing testimony and preparing for Congressional hearings, responding to OMB inquiries on annual budgets, planning for program and administrative operations, informing research, and providing training and technical assistance.

7. Special Circumstances: There are no special circumstances regarding the collection of this data. No individually-identifying information enters the report when it is transmitted to Washington for integration in the national database. Youth are tracked using anonymized IDs. Standard and mandated security features and confidentiality protections are built in and fully implemented.

8. Public comments

8a. Federal Register: On April 4, 2007, we initiated the regular clearance process with a 60 day notice in the Federal Register, page 16796 Vol. 72, No. 65. A copy of the first Federal Register notice is provided below.

8b. Efforts to Consult with Persons Outside the Agency: During the course of time in which changes were discussed and drafted, many individuals and organizations were consulted; additionally, such individuals and groups routinely comment on the overall use of NEORHYMIS as well. These individuals and organizations included: staff of the RHY programs, contractors who are working on related RHY projects; other experts in the runaway and homeless youth field, and national organizations which address the needs of runaway and

homeless youth, such as the National Network for Youth. Two national conferences are held each year, one by the National Network for Youth, attended by program directors and staff from all three FYSB RHY programs, and one held by the National Resource Center for Youth Services for transitional living program providers. The contractor for RHYMIS engaged in an extensive discussion with RHY program managers in the grantee organizations on the subject of the small change in BCP approved last year and incorporated into the current application.

FYSB's Director of Research, Evaluation and Regional Operations has talked with dozens of TLP directors in Region 3, 4, 5, and 10, discussing new (TLP-related) features contained in the current application. The ideas were very well-received. This process is continuous and will include the other federal regions. These efforts are in addition to making the instrument available during the public comment period, during which time no comments were received.

While modifications in the TLP report were not included in the approved small change application of March 2006, (which was only for BCP), they are similar and related. Both elements capture information about non-residential, preventive, outreach and supportive services to certain youth. In BCP, it is for those who come into contact with the BCP program before they run away or engage in other risk behaviors. Similarly, TLP users will now be able to document and take credit for services provided during a wait-list, assessment, or planning period or, after program entry, during a mid-course leave of absence or respite from the residency. The need to capture information about TLP youth who temporarily separate from the program was brought to our attention and encouraged by advocates and practitioners.

The BCP and TLP modifications each amount to a "small change" within the respective BCP or TLP programs and add comparable amounts of additional data definitions and elements. Youth are not recorded in RHYMIS as both BCP and TLP participants (although a move from one to the other may take place in the course of the youth's contact with the agency). Hence, the small change in BCP does not impact TLP users as such, and the similar change in TLP does not affect BCP users. In any case, the changes are applicable only to a subset of youth.

An additional option was provided adding "Individual Development Account" to a list of mainstream program referrals.

Finally, besides the new above new elements and definitions, here and there throughout both BCP and TLP we added clarifications, information, and explanatory text in the manner of help screens and messages in the software. These will improve ease of use as well as accuracy of response.

9. Payment or Gifts to Respondents: There is no remuneration, of any kind, to NEORHYMIS users. Participation in data collection is mandated for all RHY grantees.

10. Assurance of Confidentiality: NEORHYMIS has built-in, structured security mechanisms that assure the confidentiality of the clients. These mechanisms include:

- Identification Numbers - FYSB assigns unique identification numbers to BCP, TLP, and SOP grantees. The youth identification number is generated by the automated

- system according to a secure, programmed algorithm. Once a youth is added into the database, only his/her identification number appears on data entry screens and storage files. Individual client files are accessible only to authorized grantee staff.
- Informed Consent - Youth and families are informed about the data collection process, and are asked to sign an informed consent form documenting their awareness and understanding of the data collection process before any data elements are entered into the system. Refusal to participate in the data collection process does not preclude a youth or family from receiving services.
 - System Security/User Identification - Access to each data file within NEORHYMIS is limited by the use of an authorized user identification number, password, and other security procedures. The grantee's management controls all access to data.

11. Justification of Questions of a Sensitive Nature: Some information that may be considered sensitive is collected routinely on the runaway and homeless youth and families served by the RHY programs and has been incorporated into NEORHYMIS. This information pertains to the youth and their family's socio-economic status, mental health, alcohol and other drug involvement, legal status, and family and social relationships. It must be noted that, prior to participating in a project, all youth and families are informed that information about them and the services they receive, will be collected, recorded, and submitted to FYSB for statistical analysis. As stated above, youth and families are assured that all information is strictly confidential and that their identities are protected.

This information is extremely critical for: effective delivery of services, evaluation of the effectiveness of services provided, evaluation of the RHY grantee efforts, the early identification of trends and problems, and budget forecasting. The information collected through NEORHYMIS is essential to the development of an effective, targeted service plan for each individual youth and family. This information is also needed to adequately measure and evaluate the outcome of the youth's involvement with a particular program.

12. Estimates of Respondent Burden:

Instrument	Number of Respondents,	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Youth Profile* in both BCP and TLP	536	153	.25	20502
Street Outreach Report	141	4211	.02	11875.02
Brief Contacts	536	305	.15	24522
Turnaways	536	13	.1	696.8
Data Transfer	536	2	.5	536

Estimated Total Annual Burden Hours:

58131.82

13. Estimates of Annualized Cost burden to Respondent:

Task / Item	Annual Number	Annual Cost	Estimated Annual Cost
Training	Not needed – experience has shown that RHYMIS can be self taught with tech support assistance		
Hardware (basic PC, need not be state of art)	677	\$500 One time cost only)	Less than \$338,500
System Maintenance	677	\$200	\$135,400
Supplies (Diskettes, Mail, etc)	677	\$50	\$33,850
Total for all 677 grantees			\$507,750

There is no cost to the grantees for training, ongoing technical support, software or any supporting documentation. Note that expiration of approval on 4/30/2004 technically requires this be calculated against zero.)

**Estimated total annual personnel cost
(assuming \$25/hr for data entry): \$1,453,296**

Notes:

1. Hardware for most agencies has been acquired, Hardware and Software estimates are annualized over the assumed equipment life. Software is compatible with most PCs. The equivalent contemporary system would probably be far more powerful but a very inexpensive device of relatively modest performance and capacity will suffice.
2. Agencies are required to include these costs in grant budgets as part of their competitive proposals.
3. Software and tech support is provided free of cost to grantees.

14. Estimates of Annualized Cost to Federal Government:

Task / Item	Estimated Annual Cost
1. Technical Assistance hotline (business hours, Monday-Friday)	\$125,000
2. System maintenance and Data replication	\$84,000
3. Data Analysis and Reporting	\$84,000
4. Data Submittal Logging and Integration	\$84,000
5. Software Modifications	\$281,000
6. Federal Gov't Staff (project officer @ .1 FTE)	\$12,000
7. Federal Gov't Travel	\$2,000
Total	\$672,000

Note: Activities 1 through 5 are provided under a contract with Computer Sciences Corporation (CSC). Costs represent approximations.

15. Reasons for Change in Burden:

The burden change is primarily due to additional agencies being funded and a different number of youth being served (both of which fluctuate from year to year). Grantees' reports of experience regarding the time required for data entry and record keeping, and our own testing, suggest negligible increases in time burden resulting from the additional options, which mostly give additional options to capture special situations and apply to a limited subset of youth in either BCP or TLP. Grantee estimates on the time needed to enter the BCP or TLP entrance or exit report data for each youth ranged from a few or a couple of minutes, to five, ten or fifteen minutes. One cited 20 minutes when careful double checking is called for. The two reports cited in this section as examples are by far the longest and most frequently needed.

16. Tabulation and Publication

16a. Plans for the Tabulation and Statistical Analysis: The data collected by NEORHYMIS will be analyzed to determine the characteristics of runaway and homeless youth, their problems, and services provided to them. As exemplified under "Use of Data", FYSB also will conduct statistical analyses on information about runaway and homeless youth and program activities in order to develop management improvement strategies suggested by statistical trends and patterns.

16b. Publications: The data collected through NEORHYMIS will be published by FYSB, as required by Federal law (RHYA), in a report to Congress on the BCP, TLP, and SOP programs. The data will also support FYSB's annual performance plans under the Government Performance and Results Act and appear in Congressional testimony and briefings. Brochures, fact sheets, and other publications periodically produced by FYSB also will include information gathered by NEORHYMIS. These publications will inform potential grantees and the general public about the breadth and scope of the runaway and homeless youth programs, and will support the identification of trends and problems among runaway and homeless youth served in RHY programs.

NEORHYMIS data may also appear in reports and evaluations on the prevention of youth homelessness which have been mandated by the authorizing legislation.

<https://extranet.acf.hhs.gov/rhymis> is a website where anyone can download and request standard and ad hoc reports on the existing data. Functional improvements in this site are planned once this instrument is approved and the new software version finalized.

16c. Project Time Schedule:

FYSB submits 2 nd Federal Register Notice for publication	Early June FY 07
End of 2 nd 30 day comment period	Early July FY 07
Negotiate final changes with OMB	July FY 07
FYSB anticipates approval from OMB	August FY 07
FYSB and contractor finalize and distribute	September FY 07
Contractor receives and validates 2 nd half reports	Early November FY 08
FYSB provides FY 07 data to GPRA performance report	Late November FY 08

17. Expiration Date: The requested expiration date is 3 years from the approval date.

18. Certification Statement: This issue is not applicable. There are no exceptions to the certification statement identified on Form OMB 83-I.

B. Collection of Information Employing Statistical Methods: This issue is not applicable. The data will not be collected via statistical methods as explained.

EXHIBIT 1: Legislative/Regulatory Authority

Sections of legislation and regulations relevant to information collection
For RHY programs

Legislative:

The Runaway and Homeless Youth Act (Title III of the Juvenile Justice and Delinquency Prevention Act of 1974), as Amended by the Runaway, Homeless, and Missing Children Protection Act (P.L. 108-96)

SEC. 312. "ELIGIBILITY [Basic Center Program]

(b) In order to qualify for assistance under section 311(a), an applicant shall submit a plan to the Secretary including assurances that the applicant—

(7) shall keep adequate statistical records profiling the youth and family members whom it serves (including youth who are not referred to out-of-home shelter services), except that records maintained on individual runaway and homeless youth shall not be disclosed without the consent of the individual youth and parent or legal guardian to anyone other than another agency compiling statistical records or a government agency involved in the disposition of criminal charges against an individual runaway and homeless youth, and reports or other documents based on such statistical records shall not disclose the identity of individual runaway and homeless youth;

(8) shall submit annual reports to the Secretary detailing how the center has been able to meet the goals of its plans and reporting the statistical summaries required by paragraph (7);

(12) shall submit to the Secretary an annual report that includes, with respect to the year for which the report is submitted—

(A) information regarding the activities carried out under this part;

(B) the achievements of the project under this part carried out by the applicant; and

(C) statistical summaries describing—

(i) the number and the characteristics of the runaway and homeless youth, and youth at risk of family separation, who participate in the project; and

(ii) the services provided to such youth by the project.

Part B [Transitional Living Program]

ELIGIBILITY

....

SEC. 322. (a) To be eligible for assistance under this part, an applicant shall propose to establish, strengthen, or fund a transitional living youth project for homeless youth and shall submit to the Secretary a plan in which such applicant agrees, as part of such project—

(9) to submit to the Secretary an annual report that includes information regarding the activities carried out with funds under this part, the achievements of the project under this part carried out

by the applicant and statistical summaries describing the number and the characteristics of the homeless youth who participate in such project, and the services provided to such youth by such project, in the year for which the report is submitted;

(12) to keep adequate statistical records profiling homeless youth which it serves and not to disclose the identity of individual homeless youth in reports or other documents based on such statistical records;

(13) not to disclose records maintained on individual homeless youth without the informed consent of the individual youth to anyone other than an agency compiling statistical records;

(14) to provide to the Secretary such other information as the Secretary may reasonably require.

Regulatory:

Code of Federal Regulations, 45 CFR, Chapter XIII, Part 1351: Runaway Youth Program, Sub part C, Section 1351.20 (c):

"Grantees will also be required to submit statistical reports profiling the clients served. The statistical reporting requirements are mandated by the Act which states that "runaway youth projects shall keep adequate statistical records profiling the children and parents which it serves..." [FR Doc. 78-32473 Filed 11-27-78;]

EXHIBIT 2: FIRST FEDERAL REGISTER NOTICE

[Federal Register: April 5, 2007 (Volume 72, Number 65)]

[Notices]

[Page 16796]

From the Federal Register Online via GPO Access [wais.access.gpo.gov]

[DOCID:fr05ap07-84]

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DEPARTMENT OF HEALTH AND HUMAN SERVICES

Administration for Children and Families

Proposed Information Collection Activity; Comment Request
Proposed Project

Title: National Extranet Optimized **Runaway** and **Homeless Youth**
Management Information System (NEO-RHYMIS).

OMB No.: 0970-0123.

Description: The **Runaway** and **Homeless Youth** Act, as amended by Public Law 106-71 (42 U.S.C. 5701 et seq.) mandates that the Department of Health and Human Services (HHS) report regularly to Congress on the status of HHS-funded programs serving **runaway** and **homeless youth**. Such reporting is similarly mandated by the Government Performance and

Results Act. Organizations funded under the **Runaway and Homeless Youth** program are required by statute (42 U.S.C. 5712, 42 U.S.C. 5714-2) to meet certain data collection and reporting requirements. These requirements include maintenance of client statistical records on the number and the characteristics of the **runaway** and **homeless youth**, and **youth** at risk of family separation, who participate in the project, and the services provided to such **youth** by the project.

Respondents: Public and private, community-based nonprofit and faith-based organizations receiving HHS funds for services to **runaway** and **homeless youth**.

Estimated Total Annual Burden Hours: 58,132.

In compliance with the requirements of Section 3506(c)(2)(A) of the Paperwork Reduction Act of 1995, the Administration for Children and Families is soliciting public comment on the specific aspects of the information collection described above. Copies of the proposed collection of information can be obtained and comments may be forwarded by writing to the Administration for Children and Families, Office of Administration, Office of Information Services, 370 L'Enfant Promenade, SW., Washington, DC 20447, Attn: ACF Reports Clearance Officer. E-mail address: infocollection@acf.hhs.gov. All requests should be identified by the title of the information collection.

The Department specifically requests comments on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the accuracy of the agency's estimate of the burden of the proposed collection of information; (c) the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology. Consideration will be given to comments and suggestions submitted within 60 days of this publication.