

## THE SUPPORTING STATEMENT

### **Specific Instructions**

#### **A. Justification. Requests for approval shall:**

##### **1. Circumstances Making the collection of Information Necessary**

On September 30, 2007, the Administration for Children and Families (ACF), Children's Bureau awarded multi-year grants to 53 Regional Partnership Grantees to improve the well-being, permanency and safety of children affected by methamphetamine or other substance abuse who have been removed or are at risk of removal from their home. The Child and Family Services Improvement Act of 2006 (S.3525), the authorizing legislation establishing Targeted Grants to Increase the Well-Being Of, And to improve the Permanency Outcomes For, Children Affected by Methamphetamine Or Other Substance Abuse, referred to herein as the Regional Partnership Grantee Program (RPG), required that a set of performance indicators be established to periodically assess the grantees' outcomes. Section 4(b)(2)(A)(9)(B) requires the Secretary of the Department of Health and Human Services (DHHS) to submit annually a report to Congress that includes the performance indicators established under this program. The legislation mandated that these performance indicators be developed through a consultative process involving ACF, the Substance Abuse and Mental Health Services Administration (SAMHSA), and representatives of the State or Tribal agencies who are members of the regional partnerships. Concurrent with the grant awards, the Children's Bureau awarded a support contract to the Center for Children and Family Futures to support a grantee performance management system. This includes defining the final set of performance indicators, developing an RPG data collection and reporting system, providing technical assistance to grantees, and providing an analysis of the performance indicators. With the assistance of the support contract this requirement is being implemented by creating a collection of information entitled the "Regional Partnership Grantee Performance Indicator Database."

The final set of RPG performance indicators was approved by ACF and disseminated to the funded grantees in January 2008 for their comment and input. It includes a total of 23 indicators across four outcome domains: child/youth (9 indicators), adult (7

indicators), family/relationship (5 indicators), and regional partnership/service capacity (2 indicators). These domains include both child welfare system and substance abuse treatment system indicators. It also includes a core set of child and adult demographic elements that will provide important context needed to properly analyze, explain and understand the outcomes. No other national data collection measures the critical child, adult, family, and Regional Partnership/Service capacity outcomes specifically for these children and families served through this initiative. However, as discussed below, respondents will be able to maximize the use of existing information systems at a State or local level by extracting specific data elements and submitting them to the Children's Bureau, thus reducing the burden of primary data collection. The data also will have significant implications for policy and program development for child well-being programs nationwide.

## **2. Purpose and Use of the Information Collection**

As part of required RPG 6-month reporting requirements, ACF will ask grantees to report data needed to calculate a total of 23 performance indicators across four domains (child/youth, adult, family and regional partnership service capacity) for the purposes of monitoring the improved safety, permanency and well-being of children affected by methamphetamine or other substance abuse who have been removed or are at risk of removal from their home. Ultimately, this information will be reported to Congress.

## **3. Use of Improved Information Technology and Burden Reduction**

To minimize grantee data collection and reporting burden, many of the data elements are already being collected by counties and States in order to report Federally-mandated data for the Adoption and Foster Care Analysis and Reporting System (AFCARS), the Treatment Episode Data Set (TEDS) and the National Outcome Measures (NOMs); in addition, all States voluntarily submit data for the Federal National Child Abuse and Neglect Data System (NCANDS). Therefore, most child welfare data elements included in the RPG performance measures can be found in a State's automated case management system, which is often a Federally-funded Statewide Automated Child Welfare Information System (SACWIS). These automated case management systems track individual families

and children and then submit data semi-annually to AFCARS and annually to NCANDS. AFCARS reports information on all children in foster care, while NCANDS reports information on State child maltreatment reports. TEDS admission and discharge data are collected by State substance abuse agencies according to their own information systems for monitoring substance abuse treatment admissions and transmitted monthly or quarterly to the SAMHSA contractor.

The RPGs will submit to the Regional Partnership Grantee Performance Indicator Database in an electronic format. Data for the 23 indicators will be collected via (a) extraction from established State data systems (e.g., SACWIS, and State or local substance abuse information systems) and (b) new data collection. Although ACF has not determined the exact method of transmission, ACF will explore the possibility of using Extensible Markup Language (XML) and other recent technologies for file transmission consistent with the E-Government Act of 2002 (Public Law 107-347).

#### **4. Efforts to Identify Duplication and Use of Similar Information**

After analysis of the sources and reporting instruments already in use by ACF and SAMSHA, it is concluded that there is no single automated system that collects the information required for the report to Congress. Following from #3 above, as a result of prior Federal government reporting requirements, RPGs will be able to use existing data for seven performance indicators. The RPGs can coordinate with State or county data/information systems administrators to download information from these existing State child welfare and substance abuse treatment data systems to obtain data on the RPG children and families served (and comparison groups, if applicable). This reduces the amount of primary data collection needed and eliminating any possibility of duplication at the grantee level. Since there are no existing reporting systems that collect the data required by this grant program, this data collection plan does not duplicate any current efforts.

#### **5. Impact on Small Businesses or Other Small Entities**

The proposed information collection is not likely to impact small businesses and the information being requested or required has been held to the absolute minimum required for the intended use.

#### **6. Consequences of Collecting the Information Less Frequently**

The purpose of this request is to obtain OMB approval to collect this legislatively required performance and outcome data from the RPGs twice annually. This collection of performance indicators is mandated by law therefore, we would be out of compliance with the statutory requirements if we did not collect performance indicator information on the grantees. This approach will enable the Children's Bureau to meet this requirement, while minimizing the burden placed on grantees and avoiding duplicate data collection.

#### **7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances for this data collection.

#### **8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

The emergency Federal Register notice was published 8/25/2008.

#### **9. Explanation of Any Payment or Gift to Respondents**

No payment or gift will be provided to respondents associated with this data collection.

#### **10. Assurance of Confidentiality Provided to Respondents**

All grantees have had their evaluation and data collection protocols reviewed by their local or State Institutional Review Boards (IRB). Depending on the IRB, grantees have either been required to submit full IRB applications or have been granted IRB exemptions. The IRB exemptions have resulted from the view that the grant programs are not conducting research. When exemptions are not granted and IRB approval has been obtained, the grantees will follow the HHS Protection of Human Subjects regulations (45

CFR Part 46) including providing participants with full disclosure of the study methods and purpose, the voluntary nature of their participation, and their right to withdraw from the study without prejudice. In addition, all grantees are taking precautions to protect the privacy and confidentiality of their data through measures such as password protected files.

All data uploaded to the RPG Data System will be de-identified to ensure human subjects protection of confidentiality. No client identifier such as name or social security number will be collected through the RPG Data System. The RPG Data System will ensure the confidentiality of its data through the use of password protection.

## **11. Justification for Sensitive Questions**

Sensitive data that will be collected from participants being served by grantees will be submitted without client identifying information. As established above, the purpose of the regional partnership grants is to improve the well-being, permanency, and safety outcomes for children affected by methamphetamine and other substance abuse. For parents who are endangering their children as a result of their own substance abuse or addiction, measuring their pattern of substance use is a critical indicator of recovery. Since the well-being and safety of children is directly related to the parental capacity to provide for their children's needs, assessing improvements in family relationships, mental health status, and child well-being become important indicators in measuring the overall impact of this grant program. As these are direct services grants, most of these data are collected in the course of providing services, with client consent to participate in these services and provide this information.

## **12. Estimates of Annualized Burden Hours and Costs**

The basis for this respondent burden estimate below is information provided from a sample of RPG grantees that provided information about hour and cost burdens.

INFORMATION COLLECTION	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Private Sector	22	2	175.5	7,722
State, local, or Tribal Government	31	2	175.5	10,881
Estimated Total Annual Burden Hours:				18,603

The annualized cost of the response burden is the product of the average hourly wage (unburdened) for RPG staff times the total burden estimate: \$41/hour x 18,603 hours = \$762,723.00. This average hourly wage was derived from wage information collected from a sample of funded grantees.

### 13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

The capital and start-up costs, as well as total operation and maintenance costs were derived from responses from actual grantees regarding their capital and start-up costs as well as their total operation and maintenance costs.

Total Capital and Start-up	\$3426 x 53 = \$181,578
Total operation, maintenance and purchase of services	

### 14. Annualized Cost to the Federal Government

Annualized Cost to Respondents (12)	762,723.00
Annual cost burden to respondents or record keepers (13)	181,578.00
Annualized cost to Federal Government (14)	184,052.00
Total Average Annual Cost	1,128,353.00

**15. Explanation of Program Changes or Adjustments**

This is a new project.

**16. Plans for Tabulation and Publication and Project Time Schedule**

There are no plans to publish from the data collected from this new project.

**17. Reason(s) Display of OMB Expiration Date is Inappropriate**

This new project is not seeking approval to not display the expiration date for OMB approval.

**18. Exceptions to Certification for Paperwork Reduction Act Submission**

This new project takes no exceptions to the certification statement identified in Item 19 on Form OMB 83-I.

**B. Collections of Information Employing Statistical Methods**

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When item 16 is checked "Yes," the following documentation should be included in the supporting statement to the extent that it applies to the methods proposed:

1. Describe (including numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The respondent universe for this new project is all RPG grantees (N=53). Because all RPG grantees will be respondents in this new project, no sampling methods will be employed. The expected response rate for this new project is 100 percent.

**2. Describe the procedures for the collection of information including:**

- . **Statistical methodology for stratification and sample selection,**
- . **Estimation procedure,**
- . **Degree of accuracy needed for the purpose described in the justification,**
- . **Unusual problems requiring specialized sampling procedures, and**
- . **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

This new project will not employ any statistical methodology for stratification and sample selection, nor will it use estimation procedures.

**3. Describe methods to maximize response rates and to deal with issues of nonresponse. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.**

Each grantee is assigned a Performance Management Liaison (PML) through the support contract with ACF, who provides technical assistance on evaluation and programmatic issues. PMLs have been conducting monthly calls with grantees, and will have conducted onsite visits with all 53 sites by the end of June, 2008. Regular contact will continue with grantees in order to ensure high response rates.



4. Describe any tests of procedures or methods to be undertaken.

Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for collection of identical information from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

In order to define the estimated response and cost burdens of this new project, the Children's Bureau collected and analyzed information from 8 RPG grantees.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

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