

## PAPERWORK REDUCTION ACT SUBMISSION SUPPORTING STATEMENT

Agency: Office of Juvenile Justice and Delinquency Prevention (OJJDP)  
Title: Census of Juveniles on Probation  
Form: 1121-0291  
OMB No.: (current approval expired 12/31/2007)

### A. JUSTIFICATION

#### 1. Circumstances of the Collection

The Office of Juvenile Justice and Delinquency Prevention (OJJDP) requests reinstatement, with change, of OMB collection #1121-0291 (previously called the National Juvenile Probation Census Project, now to be called the **Census of Juveniles on Probation (CJP)**). The CJP was previously approved by OMB under the name "National Juvenile Probation Census Project" (OMB #1121-0291), which also included a partner data collection form, the **Census of Juvenile Probation Supervision Offices (CJPSO)**. The National Juvenile Probation Census Project expired 12/31/2007 and OJJDP has spent the past several months engaged in improvements to the collection. As part of those improvements, OJJDP determined it was best to separate the OMB approval packages for the 2 data collections and will submit the CJPSO package later this year. (See Attachment A for email notifying OMB and others of OJJDP's decision to revamp the collection and implement improvements.)

Supervising nearly 500,000 young people from about 1,600 offices on any given day, juvenile probation has aptly been termed the "workhorse of the juvenile justice system." Recognizing both the critical role of probation in the juvenile justice system and the dearth of systematic information available, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) embarked upon the first national effort to gather policy- and practitioner-relevant information on juvenile probation in the late 1990s. The result was the design of the National Juvenile Probation Project, a two part data collection project which consisted of the following 2 forms:

- 1. Census of Juvenile Probation Supervision Offices (CJPSO).** This form collects aggregate counts of the number of youth on (a) formal and (b) informal probation that are supervised by juvenile probation supervision offices in the United States. These counts are *not* disaggregated by any second variable. In addition, this form asks questions about the different juvenile probation processing options utilized by respondent offices, as well as information about monitoring, sanction and treatment options. The form also includes questions about partnerships and contracts, prevention programming, representation of juveniles, and administrative issues. This collection requires very little in the way of record checking. The CJPSO was administered in 2005 and 2007, under the previously approved OMB package.

**2. Census of Juveniles on Probation (CJP).** This form was designed to collect individual-level information on young people supervised by the same juvenile probation supervision offices surveyed in the CJPSO. For each young person, the form collects the age, sex, race, offense type and supervising office. Respondents have numerous options for responding and for gaining technical support from the research staff. To date, the CJP has only been administered once from a sample of Juvenile Probation Supervision Offices (as a pilot test, in 2006). Considerable improvements have been made to the collection (detailed later in this package) and it is anticipated that most of the respondents will provide this information in an electronic format for the next collection (2009).

### Mixed Results from the CJPSO and CJP Collection Efforts (2005-2007)

#### **CJPSO 2005 and 2007**

The CJPSO has been very successful in the field. The first administration of the Census of Juvenile Probation Supervision Offices (CJPSO) occurred in April, 2005, and a second administration occurred in 2007. Nearly 88% of all pre-identified juvenile probation offices responded in the first administration, and 92% responded in the second administration. The U.S. Census Bureau has just completed editing the 2007 data files, so results are in progress from that collection. (See Attachment E for a compilation of summary data sent to all respondents following the 2005 collection.)

#### **The 2006 CJP pilot test**

In contrast to the high response rates for the CJPSO, the test-run of the first CJP in 2006 resulted in a disappointing response rate of 62%. The CJP pilot test was administered by the US Census Bureau to a nationally representative statistical sample of 176 offices. This sample of 176 Geographic Probation Supervision Areas was drawn using a probability proportionate to size design with stratification by number of GPSAs served. The total universe is 1,606 Geographic Probation Supervision Areas.

The test data were first available for internal Census review in late 2007, at which point the Census Bureau reported that imputations would not be computed for national estimates. This conclusion was based on the Census Bureau interpretation of OMB policy prohibiting imputation for data collections with response rates lower than 70% *in which it is thought that non-response is the result of systematic rather than random processes*. When pressed for the specific criteria leading to the non-imputation decision, the Census Bureau only cited the 70% rule and no firm objective or subjective statistical decision rules. Further, the data collected by the Census Bureau were found to have errors and files were incomplete.

In early 2008, a decision was made to withdraw the OMB package requesting renewal of the CJP and instead undertake a study period to diagnose what led to the failings in the pilot. OJJDP convened a CJP Workgroup, consisting of representatives from OJJDP, the United

States Census Bureau, CSR, Inc., and a team of researchers from George Mason University (GMU).

This OMB renewal request reflects an overhaul of the CJP administration, which is described below.

## **A CJP Workgroup**

Considering all of the pretesting and survey design research conducted by George Mason University for the CJPSO and CJP development, along with the best reconstruction of events from the Census Bureau, the CJP work group reached the following initial conclusions in the May, 2008:

1. The CJP questionnaire is well-developed and does not need significant redesign.
2. There are several classes of respondents who will require significant technical assistance, training, and recruitment.
3. *All* respondents will require more flexibility in data reporting options, particularly increases in electronic/automated methods.
4. The most critical aspect of the questionnaire is the respondent instructions and support options.
5. In comparing the CJP to its individual-level facility census counterpart (the CJRP – which has had sound response rates), the CJP is at a disadvantage because:
  - a. It does not have the benefit of a long history of data collection efforts from OJJDP. For instance, residential facilities have had decades of contact, dating back to the initial Children in Custody Series.
  - b. It is a much larger population (by about five times).
  - c. Record keeping is more fluid because the young people are in the community and because of the wide geographic areas served by each office.
  - d. The data collection effort will be successful in its next administration (April 2009) if rapid and significant efforts are taken to increase respondent outreach, training, and the development of more flexible automated and electronic submission options.
6. It is not possible for the US Bureau of the Census to take the measures to ensure that all critical activities can be successfully completed in the time frame and within the current budget allowances.
7. As of September 2008, the data collection aspects of the project will move to George Mason University.

## Focus Groups for CJP development

The first proactive action of the CJP Workgroup was to convene focus groups of respondents to gain feedback on the CJP data collection. Attachment F contains the full report prepared by George Mason University. To briefly summarize, the Workgroup randomly selected probation offices from a frame file stratified by probation population size and by CJP pilot respondent status (CJP responder, CJP non-responder, and respondents not selected into the CJP sample).

In an attempt to maximize respondent participation, these focus groups were held August 2-3, 2008, immediately prior to the American Parole and Probation Association's (APPA) Annual Training Institute in Las Vegas. The final focus group protocol consisted of 24 slides containing "think aloud" questions (see Attachment F). The major themes explored included: Perceptions of OJJDP, attitudes about the need for the individual-level data collection and the utility of the data for respondents; technical issues with storing and reporting the data; organizational issues such as workload for data reporters; and experiences with other data requests from external sources.

There were 16 participants across the four focus groups representing about 60,000 young people on probation on any given day. This amounts to approximately 1/6<sup>th</sup> of all formal probationers for whom individual-level data will be sought in the CJP collection.

Conclusions from the focus groups included the following key items:

1. ***It will be critical to highlight the utility of the data.*** The focus group respondents were convinced of the need and benefit of the data collections, but noted that it took a cognitive leap to see how these data would help them in their jobs. Utility would be best seen for the respondents in the following manner:
  - a. Respondents agreed that the most important use of data for their purposes would be the creation of comparisons with like offices. These respondents felt there was a need to describe the national trends surrounding juvenile probation, however, the most immediate and grabbing utility for them was getting like comparisons for their own office. Thus, the single most important thing that the CJP can do to increase response rates will be to tie the data to a program that matches responding offices to masked similar jurisdictions and providing automated comparisons for respondents. This could be done through automated selection of jurisdictions matched on external data points such as overall population density, juvenile population, UCR rate of juvenile crime, poverty, etc.
  - b. The creation of a professional network for responding offices would aid both the data collection and the practitioner field. The same model presented above could be replicated but allow location identities to be voluntarily disclosed between consenting areas, thus linking like jurisdictions for personal contact. Participants supported the proposal of a "peer pal program" as a critical leap in the sharing of data and best

practices through an interstate targeted network across the country. Since the data is to be collected as a census appropriate, voluntary consent could reasonably result in a cross country linkage in such a "peer pal program". An incentive for completion such as early access to data would be welcome. Along these lines, respondents were very open to a list serve that allowed respondents to reach out to other professionals in general, but to discuss problems with the data process more specifically.

- c. Use the CJP to test national definitions and standards. The desire for national leadership is clear, and these respondents saw the CJP as a convenient tool to being such a discussion, to test new measures, and to explore outcomes.
2. **Respondents supported a fully automated collection process.** Electronic completion could permit clarification for terms that posed problems to responders. Responders for the initial 2006 collection identified offense code as an obstacle to survey completion. An online application to automatically display a selection menu tied to a table of offenses coded to match the respondent's state would be very helpful to CJP responders. Other potentially problematic areas could be similarly cleared up through the implementation of contextual "pop-up" or "alert" messages in the online survey to conveniently present clear definitions of such potentially confusing terms such as "informal" probation.
3. **Allow continued access to automated form.** Given that the CJP was unlikely to be completed in one sitting an online system permitting return visits over several weeks while saving the previous work would be very welcome. Participants recognized that paper and electronic reminders at reasonable intervals would be useful and welcome.
4. **Increasing visibility of the CJP within the office and to supervisors.** Focus group members thought it would be helpful to include their supervisors in some of the correspondence. Allowing others in the office to understand how valuable their contribution to the CJP is on a national level will lay the ground work for concentrated effort on this census. Responders must prioritize the data requests they receive, and participants uniformly agreed that the priority placed on a request relates largely to how that data request is perceived by their supervisors. If the only person in the juvenile probation office who is aware of the CJP is the responder, the responder could easily rank the CJP as less of a demand than requests passing through the hands of others in the same office.
5. **In addition to letting supervisors know of the CJP, a general publicity campaign might be helpful to OJJDP.** Participants proposed raising the CJP's profile with various state officials through: mass mailings advising the offices that the census was on its way; thank you letters to responders, letters to commissioners, state legislators, and other external supervising entities, and e-mail updates to all probation professionals containing snippets of information gleaned from CJP analysis.
6. **Technical assistance is needed for most respondents.** Some participants representing state-level or large metropolitan area data were enthusiastic about the idea of an onsite visit from CJP team members with the goal of collaborating on a methodology for extracting

survey data from raw data files. At least one respondent had devised a method for data extraction on own for the initial survey but felt that the task could be much more efficiently accomplished with direct cooperation. Most noted that having a personal contact would go a long way to increasing response rates, perhaps through low pressure calls or infrequent e-mails.

7. ***Create a peer leadership structure around the CJP.*** As one respondent put it, he was much more likely to fill out a form if his friend and peer in the neighboring state told him he should. Thus, the participants were willing to assist OJJDP through the recruiting and training of peers in responding to the CJP (with the requisite prior consent from all parties involved). On a humorous note, many requested certificates of authority, sashes, tiaras, and other indicia of their status of “CJP Ambassadors.” There was an overwhelming willingness to update peers at monthly/quarterly meetings with materials from the CJP Workgroup guiding them on what to cover at each contact.
8. ***Fine-tune the timing of the collection process.*** The request for data permitting only a short turn-around time was likely to reduce response rates considerably. Ensuring ample time between first notification and final submission would facilitate planning and therefore result in increased response rates. Ideally first contact would be welcome 90 days prior to the collection date. Participants would like a hard copy sometime between 90 and 30 days prior to the collection date. While a paper copy of the survey was requested electronic submission was widely desired by participants.

## The Redesigned CJP collection program

The CJP collection program has been redesigned into a respondent-focused effort. The following include the major changes between the pilot-test conducted by the Census Bureau and the current CJP structure created at GMU:

1. All respondents receive a personal contact from a member of the research team.
2. Client tracking software is used to record each respondent contact to reduce unnecessary and confused communications. These data points will be tied to response outcomes (full respondent, critical item respondent, non-respondent) to inform practices for future administrations.
3. The pre-notification process is largely automated, and relies on e-mail or phone contacts with respondents rather than paper mail fliers.
4. The notification process includes an automated (or staff conducted) “pre-registration” to ensure that the correct respondent has been identified and is prepared to participate.
  - a. Pre-registration is fully automated (see Attachment B).
  - b. The pre-registration site provides links to resources including: contact information, FAQs, prior reports, and electronic copies of the forms.
  - c. The pre-registration process is short (3 minutes).
5. Respondents are asked about the type of assistance they would like in preparing for and completing the questionnaire.
6. Per the focus groups, respondents are asked whether the research team may notify supervisors or peers about the data collection.
7. The CJP questionnaire has been fully automated and the collection is considerably more flexible.
  - a. The questionnaire may be filled on-line, through download, pre-defined spreadsheets, through downloadable forms that may be e-mailed, by paper and pencil. Alternatively, respondents may submit data in incompatible formats and researchers will transpose the data.
  - b. The questionnaire forms are tied to state-specific geographic information codes.
  - c. As the research team is able, the offense codes for the forms will be tied to each state’s criminal code.
8. The CJP online applications will stay open for respondents to view and work on for a sixty day period after the reference date.
9. Training is available for respondents at the February 2009 APPA meetings, and at the meetings of the Academy of Criminal Justice Sciences and the National Council of Family and Juvenile Court Judges.
  - a. Webinars and help sessions will be available in the 60 day period surrounding the collection.
  - b. Where necessary, in-person assistance will be offered to respondents with high population counts.
  - c. Respondents are asked whether they would like to participate in a “peer-pal” program that will match them to respondents in like offices around the country. This program will be facilitated by the research staff. Following consultation with the Office of Justice Programs’ Office of General Counsel and OJP’s Human

Subjects Officers, we have limited the scope of the “peer-pal” waiver of confidentiality to cover only the name and contact information of the participant in the Peer Pal program. Attached is a copy of the Informed Consent for Participation in the CJP Peer Pal Program. OJJDP does not plan to share any individual jurisdictional juvenile population data nor any operational/policy information from the CJP censuses. The Peer Pal Program will facilitate networking and discussions of problems of mutual interest, but not the sharing of CJP data.

10. Aggregated results will be available much more quickly to respondents and will be available electronically through the resource portals.
11. Programming at GMU will create masked comparisons of respondent’s populations to those in areas that similar on external data points.
12. Data from the CJP will be merged with the CJPSO data. Aggregated summaries will be available through the web portals.

### **The importance of the CJP collection**

OJJDP anticipates that the CJP and CJPSO collections will become the backbone of the Office’s information collection efforts with regard to juvenile probation. This data collection collects information related to the most important data elements concerning juvenile probation including number and characteristics of juveniles on probation (CJP) and the activities of juvenile probation offices around the country (CJPSO). This is the only collection that collects comprehensive, national-level information about this population. While we have a source of information on yearly delinquency cases resulting in probation as a court disposition (from the National Juvenile Court Data Archive), we have no individual-level accounting for the size of the population and its characteristics. It represents the largest population under juvenile justice supervision and potentially subject to increased sanctions, and as such, is a critical population for OJJDP. Lessons from the Census of Juveniles in Residential Facilities (CJRP – the CJP counterpart for the facility population) reveal that this individual-level information is the most requested from the field.

### **OJJDP Legislative Authorization**

OJJDP is authorized to conduct this data collection under the Juvenile Justice and Delinquency Prevention Act of 2002 (the JJDP Act). For purposes of this PRA request, the relevant part of the JJDP language reads as follows:

*(b) Statistical Analyses.--The Administrator may--*

*(1) plan and identify the purposes and goals of all agreements carried out with funds provided under this subsection; and*

*(2) undertake statistical work in juvenile justice matters, for the purpose of providing for the collection, analysis, and dissemination of statistical data and information relating to juvenile delinquency and serious crimes committed by juveniles, to the juvenile justice system, to*



*juvenile violence, and to other purposes consistent with the purposes of this title and title I.*

--42 U.S.C. 5661

Copies of the relevant sections of the JJDP Act are included in this package.

## 2. Purpose and Use of the Information

Combined, the two questionnaires comprising the National Juvenile Probation Census Project allow for a national description of the population of youth supervised and the types of services and sanctions used by probation offices.

The CJPSO collects information about:

- the aggregate count of juveniles on both formal and informal probation;
- processing options utilized by juvenile probation offices;
- monitoring, sanction and treatment options used by probation offices; and
- the operation of juvenile probation offices (partnerships and contracts, prevention programming, representation of juveniles, and administrative issues).

The CJP (the subject of this package) collects information about:

- The offense characteristics of youth on probation,
- The racial breakdowns of these youth, and
- The age and gender distribution of these youth.

The specific content of these two forms was developed in tandem through a rigorous process in which OJJDP, the US Census Bureau, and George Mason University determined precisely what data are required to routinely monitor the population of youth on probation and in what format these data are needed. This process included discussions and consultations with many prominent researchers, policy analysts, and practitioners in the field of juvenile corrections. [See the section below on outside consultations. The list includes the many participants in these discussions.]

The questionnaire design process been research-based. Cognitive-interviewing, unstructured interviews and focus groups have been conducted by researchers trained in survey methods research and knowledgeable about juvenile justice and data systems processes. As described in the previous section, the CJP has undergone additional scrutiny and its success will depend on respondent outreach and burden reduction.

OJJDP will utilize the information from the CJP in the following way:

- To learn more about how states and localities use juvenile probation as a sanction and monitoring tool;
- To identify differences and similarities in how states and localities utilize juvenile probation;
- To compare the number and characteristics of juveniles on probation with juveniles in court, and juveniles in residential placement;
- To compare the rates of probation among the States;
- To compare the types of offenses for which juveniles receive probation and the characteristics of these youth;

- To identify the unique issues of minorities and females in the juvenile justice system.

In addition, OJJDP expects to produce some publications that summarize the data findings (as either Fact Sheets or OJJDP Bulletins) for the juvenile justice field. The data will be archived and available to the field through an agreement with ICPSR.

### **3. Use of Automated, Electronic, Mechanical or Other Technological Collection Techniques**

OJJDP considers automated data collection and submission an important, crucial element for any quality collection. As described in the prior section, the CJP has undergone an automation redesign in which the data collection is fully automated, flexible, and accessible to respondents. Respondent burden has been significantly reduced through customized, automated forms which tie area-specific geographic and offense code information to the form. Respondent burden has also been reduced through a substantial investment in respondent support. See Attachment B for screen shots of the registration and data submission system.

### **4. Efforts to Identify Duplication**

Data collections from OJJDP and other federal agencies have served to inform the office on juvenile probation. However, these efforts do not fully address the needs of OJJDP in developing a more comprehensive data collection on juvenile probation. Briefly, the sources of information include the following:

- The **1991 Census of Probation and Parole Agencies** conducted by the Bureau of Justice Statistics covered juvenile probation. Unfortunately, this project suffered from numerous technical problems including difficulties with updating the mailing list and problems in receiving timely and complete responses. BJS intended this project as a one-time effort to collect information on all persons on probation. It was never certain that this effort would be reproduced. Given the past difficulties and expense of this first census, it seems unlikely that BJS will be able to provide OJJDP with necessary information on juveniles on probation.
- The **National Juvenile Court Data Archive** collects *aggregated* yearly information on the disposition of delinquency cases in juvenile courts throughout the nation. From automated data and published reports submitted by court jurisdictions covering about 70% of the juvenile population, this project produces national annual estimates of court activity. These estimates include the number of cases receiving probation as their ultimate and most serious disposition. This project has produced these estimates for OJJDP since 1974 when the Office was created through the JJDP Act.

While this project can provide aggregated information on the juveniles entering probation, it does not allow for more complex and standardized analyses on the types of

youth and the services they receive. The NJCDA is an important project, but cannot replace the data collection activities in this request.

- Through the **Juvenile Probation Officer Initiative** funded by OJJDP, the office had established a routine and continuous contact to juvenile probation administrators and officers. For many years, this project served as a mechanism for training probation officers, informing these professionals of changes in the field, and keeping the Office apprised of emerging issues. The JPOI project used to maintain a list of all probation officers in the country. Due to budget constraints this aspect of the project was discontinued in Fiscal Year 1996.

The CJP and CJPSO were determined to be necessary after an exhaustive search and analysis of existing Federal and state data sources on juvenile probation. Such a search was conducted as part of OJJDP's Statistics and Systems Development Project (SSD) which aimed to improve the national and State level collection of information on juvenile justice. One task of this project was to gather information on all national data systems that could serve to inform policy makers on juvenile delinquency and juvenile justice. No similar information exists, nor can any existing information be modified to serve the purposes described above. The CJP is critical because without these individual-level data, OJJDP will not be able to answer critical policy and practice question or provide appropriate leadership on probation matters.

In addition to the activities discussed above, OJJDP has continued to consult and network with juvenile justice researchers and individuals involved directly in juvenile probation matters around the country and has found no duplication of this data collection effort.

## **5. Impact on Small Businesses and Small Entities**

Small business are not involved in this data collection.

## **6. Consequences If Information Is Collected Less Frequently**

The Census of Juveniles on Probation (CJP) is designed to be collected every other year. The juvenile justice system is in a constant state of flux. An annual survey of Juvenile Probation Supervision Offices which collects information on both the operation of those offices (the CJPSO) *and* the juveniles on their probation caseload (the CJP) would be ideal. However, it would not be practical to expect respondents to answer so many questions on an annual basis. OJJDP decided instead to split the data collection effort into two distinct parts, with each to be administered annually on a specific reference date in late April.

## **7. Special Circumstances**

Most of the special circumstances listed in the instructions for OMB Form 83-I (10/95) do not apply to this data collection for the following reasons:

- The data collections are not quarterly or more frequently;
- The respondents will have more than 30 days to respond;
- Only one copy of the document will be requested;
- The collections do not require respondents to maintain records beyond the data collection itself.
- The collections are designed to be a census of juveniles probation supervision offices and a census of juveniles on probation and as such will produce valid and reliable results;
- OJJDP will not require reporting of statistical data classifications that have not been approved by OMB.
- The pledge of confidentiality provided with the data collection derives directly from statute (see attached *42 U.S.C. 3789g*);
- The collection does not request proprietary information.

#### 8. Outside consultation

The data collection will be submitted to the Federal Register by the Department of Justice in accordance with 5 CFR 1320.8(d). OJJDP will welcome and respond to all questions and comments on the CJP. All such questions or comments will be considered, and logical or necessary changes will be made to the instrument. Draft versions of the 60 day and 30 day Federal Register announcements are included later in this package.

#### 9. Consultations outside the Office

Throughout the development phases of this project, OJJDP consulted extensively with numerous experts in the field. These consultants provided expert advice on the operations and population of the specific facilities. Since this time, additional area experts have been consulted as necessary. The Juvenile Justice Center of the American Bar Association, and Parole and Probation leaders have provided guidance on their areas of expertise.

Perhaps more importantly, the entire development phase of this survey has stressed input from respondents. The first phase of the development included interviews with personnel from juvenile probation field offices, gathering substantive comments on the structure of the survey and how OJJDP might best structure the data collection to impose the least burden possible. The second phase included a pilot-test which resulted in the decision to further explore respondent burden and attitudes toward the collection. A third phase has included focus groups with respondents, and opportunities for respondent networking and training.

OJJDP also relies on experts in the field of juvenile probation to advise the agency regarding needed changes, deletions or additions to the form. This information is gathered through periodic phone calls of the “OJJDP Data Collections Advisory Board,” as well as through conferences, regional meetings with State Juvenile Justice Specialists, and internal agency meetings. A list of the many individuals involved in advising OJJDP regarding the CJPSO, CJP and other data collection activities is included in Attachment D.

OJJDP has entered into an agreement with George Mason University for review and testing of CJP questions, including developing proposed improvements to questions and survey structure. Through this process, the names of individuals who participate in pilot testing of questions or survey protocols are guaranteed confidentiality, so they are not included here. The individual who oversaw the pilot testing process (through an OJJDP interagency agreement) is:

Catherine Gallagher, PhD  
Associate Professor  
Department of Public and International Affairs  
George Mason University  
Fairfax, VA  
(703) 993-8480  
[Cgallag4@gmu.edu](mailto:Cgallag4@gmu.edu)

OJJDP has also engaged GMU to conduct the first online preregistration and data collection of the full universe of the CJP in April 2009.

## **9. Justification of Compensation**

OJJDP will not provide compensation to respondents who participate in this data collection. Participation will be purely voluntary.

## **10. Assurance of confidentiality**

All information tending to identify individuals (including entities legally considered individuals) will be held strictly confidential according to Title 42, United States Code Section 3789(g). A copy of this section is included with this submission as Attachment C. Regulations implementing this legislation require that OJJDP staff and contractors maintain the confidentiality of the information and specifies necessary procedures for guarding this confidentiality. This regulations (28 CFR Part 22) is also included at Attachment C. A letter from OJJDP will notify persons responsible for providing these data, that their response is voluntary and the data will be held confidential. A copy of this letter along with the necessary notification is included in Section 4 of this package.

## **11. Justification for sensitive questions.**

The CJP data collection does not contain sensitive questions.

12. Estimates of hour burden

Based on the original national field test and focus groups, OJJDP established the estimates of burden, depending upon the type of responder (paper only, manual automated, partial automation and fully automated).. Estimates are based on the average time it takes to complete the respective forms, and the number that are anticipated to report in that format. The following table provides an overview of the estimate of the burden, for each respondent:

	No. of Respondents	Avg. Burden	Burden per collection
CJP	100 (paper)	8 hours	800
	100 (manual automated)	8 hours	800
	300 (partial automation)	3 hours	900
	500 (fully automated)	2 hours	1,000
	<b>Maximum Annual Burden Hours</b>		<b>3,500</b>

13. Estimates of cost burden

The forms were designed so as not to require any new systems or efforts on the part of respondents. Rather, respondents provide information that all need for their own operational functions. As such, this data collection requires no start-up costs or maintenance costs from respondents.

14. Estimate of annualized cost to the Federal Government

Based on our experience in implementing the two collections, the following table provides an overview of the costs of implementing the Juvenile Probation Census Project.

On average, the annual cost of the Census of Juveniles on Probation to the Federal government is \$372,000. Below are the funds expended by OJJDP for the CJP and CJPSO collections in 2007 and 2008. These costs, on an annual basis, come to about \$572,000. It is estimated that the CJP collection accounts for about 65% of the effort expended. Therefore, the average annual cost of the CJP is \$372,000.

<b>Organization</b>	<b>2007</b>	<b>2008</b>	<b>Total</b>
U.S. Census Bureau	\$94,000	\$150,000	
George Mason University	\$149,909	\$750,000	
Total	\$243,909	\$900,000	\$1,143,909

Annual Cost of both the CJP and CJPSO:  $\$1,143,909 \times .5 = \$571,955$   
CJP accounts for approximately 65% of effort:  $\$571,955 \times 65\% = \underline{\$371,771}$



## 15. Reasons for program changes

The change in burden hours reflected in the 83-I form (item 13.f.2) is the result of two factors. The first factor is a change in plans for administering this collection so that we will only be conducting one of these collections each year. In other words, the CJP will be conducted in alternating years, which lessens the burden on respondents. The second factor is an update on the size of the respondent universe. The original PRA request indicated a respondent universe of 1,715; based on our experience in administering this collection and updating our lists, the actual respondent universe size is about 1,000 (these 1,000 responders cover all Geographic Probation Supervision Areas (GPSAs), which total approximately 1,606). As is clear by these numbers, a proportion of responders cover more than one GPSA in their response. More information is under B.1., below.

OJJDP also requests a revision to Form CJ-17L (Census of Juveniles on Probation), p. 4, Q. 4. Race, to reflect the same language that is being used by the Census of Juveniles in Residential Placement (CJRP) OMB #1121-0218. The race question language in the CJRP was changed in 2006 as a result of the OMB PRA review of the CJRP in 2006. The new language reads as follows:

[See p. 4, Question 4. of the attached CJP form.]

4. What is this person's race?

Enter the code on the line

1. White, not of Hispanic origin.
2. Black or African American, not of Hispanic origin.
3. Hispanic or Latino (i.e., Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin), regardless of race.
4. American Indian or Alaska Native, not of Hispanic origin.
5. Asian, not of Hispanic origin.
6. Native Hawaiian or other Pacific Islander, not of Hispanic origin.
7. Two or More Races, not of Hispanic origin – *Specify*

For definitions of these categories, please refer to page 16.

*Page 16 of the CJP form includes the following information:*

The Federal Government uses the following definitions for the various racial categories.

White – A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

Black or African American – A person having origins in any of the black racial groups of Africa.

Hispanic or Latino – A person of Cuban, Mexican, Puerto Rican, South or Central American or other Spanish culture or origin, regardless of race.

American Indian or Alaska Native – A person having origins in any of the original peoples of North America and South America (including Central America) and who maintains tribal affiliations or community attachment.

Asian – A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

Native Hawaiian or other Pacific Islander – A person having origins in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islands.

Two or More Races, not of Hispanic origin – Refers to combinations of two or more of the following race categories: White, Black or African American, American Indian/Alaska Native, Asian, Native Hawaiian or other Pacific Islander. In cases of Hispanic origin, regardless of race(s), mark "Hispanic or Latino".

#### 16. Plans for tabulation and publication

OJJDP considers publication of the Juvenile Probation Census Project information important not only for Federal agencies, but also for enhancing the work of the probation offices themselves. OJJDP has developed a comprehensive system for analysis and distribution of the information collected. Under this plan, OJJDP funds an Interagency Agreement with George Mason University and a cooperative agreement to the National Center for Juvenile Justice (NCJJ) for the analysis and dissemination of statistical data relevant to the juvenile justice field.

Presentations on the preliminary findings (which are summarized in section 1) have been conducted at the Annual Meetings of the following organizations:

- American Correctional Association
- American Parole and Probation Association
- Academy of Criminal Justice Sciences
- American Society of Criminology

In addition, OJJDP has entered into an Interagency Agreement with the National Archive of Criminal Justice Data (NACJD), part of the Inter-university Consortium for Political and Social Research at the University of Michigan, to eventually make the CJP and CJPSO data files available as restricted files to researchers.

This effort would also promote the publication of research findings from the two collections.

In general, OJJDP produces summary data findings of our large data collections online through OJJDP's Statistical Briefing Book, through OJJDP publications (fact sheets, bulletins) which are written for the juvenile justice field; and through numerous conference presentations. OJJDP maintains an ongoing grant with the National Center for Juvenile Justice to produce summary statistics. The grant, called the National Juvenile Justice Data Analysis Program, is for the ongoing maintenance and updating of the Statistical Briefing Book, and the production of data-related Fact Sheets and Bulletins.

OJJDP's Statistical Briefing Book is located online at <http://ojjdp.ncjrs.gov/ojstatbb/>. As indicated under the left navigational bar, the briefing book provides statistical overviews of all key indicators and points in the system. Currently, the "Juveniles on Probation" section of the briefing book is rather sparse, but it is anticipated that the CJP data will enable OJJDP to provide Frequently Asked Questions and other resources under this category that will be similar to the type of information that is currently available under Juveniles in Corrections (<http://ojjdp.ncjrs.gov/ojstatbb/corrections/index.html>). With the CJP results, some of the FAQs we anticipate adding under Juveniles on Probation include:

- How many juveniles are on probation on a given day in the U.S.?
- What is the female proportion of juveniles on probation?
- How do probation rates vary by race?
- How old are most juveniles on probation?
- Does the race/ethnicity profile of juvenile offenders on probation vary by offense?
- Does the race/ethnicity profile of juveniles on probation vary by offense and gender?
- How do female probation rates vary by race/ethnicity and State?
- How do male probation rates vary by race/ethnicity and State?
- Does the offense profile of juveniles on probation vary by State?
- How does the type of offense resulting in probation vary by race/ethnicity?

Numerous other questions can be added; those listed above are an example only. In addition, OJJDP anticipates producing an overall "Juveniles on Probation" bulletin that would summarize the findings, as well as a series of online Fact Sheets that address some of the key issues outlined above. Regarding conference presentations, it is expected that OJJDP will present CJP findings at the next American Probation and Parole Annual Meeting, as well as at several juvenile justice related meetings and conferences (including a few sponsored by OJJDP) in 2010.

17. Request for approval to not display OMB approval expiration date.

The present request does not request such approval. The expiration date will be displayed along with the OMB approval number.

18. Exceptions to the certification statement in Item 19 of OMB Form 83-I

No exceptions to the certification statement are requested or required.