

**NATIONAL CHILD ABUSE AND NEGLECT
DATA SYSTEM (NCANDS)
SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT
SUBMISSIONS**

A. Justification

1. Circumstances Making the Collection of Information Necessary

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 December 31, 2009.

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. 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, 2003, and 2006, both instruments were re-approved in one action (Control Number 0980–0229). Since 2000, fewer and fewer States have used the SDC, and the DCDC has included both the case-level data record (the Child File) and the Agency File (additional aggregated data). This Supporting Statement addresses the request to use three information collection instruments—the Child File (see **Attachments II-1-A Child File Instructions** and **II-1-B Child File Record Layout**), the Agency File (see **Attachments II-2-A Agency File Instructions** and **II-2-B Agency File Record Layout**), and the SDC (see **Attachments II-3-A SDC Instructions** and **II-3-B SDC Record Layout**). For Federal fiscal year 2007, 48 States reported using the Child File, of which 45 also reported additional data through the Agency File. Two States were unable to report using the Child File and therefore reported using the SDC. Additionally, two States were unable to report data that year.

The Child Abuse Prevention and Treatment Act (CAPTA), as amended [42 U.S.C. 5101 et seq., 42 U.S.C 5116 et seq.] has two sections related to NCANDS. (See **Attachment I-A CAPTA Excerpt** 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 practicable, 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. These data were incorporated into reporting specifications of NCANDS by the Children’s Bureau.

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 NCANDS at this time.

2. Purpose and Use of the Information Collection

Data reported to NCANDS are central to many of the Children’s Bureau functions. Under the Children’s Bureau—and its predecessor the National Center on Child Abuse and Neglect—18 annual reports have been released. The Child File, the Agency File, and the SDC are used to provide information for the annual report. In April 2009, a news release announced the availability of *Child Maltreatment 2007* in conjunction with Child Abuse Prevention Month. (See **Attachment I-B ACF Press Release** or http://www.acf.hhs.gov/news/press/2009/child_maltreatment_report_07.html.) Approximately 6,000 copies of *Child Maltreatment* have been distributed each year. Nearly 150,000 hits are made annually to the Children’s Bureau Web site, which provides the public with vital national statistics related to child welfare. (See **Attachment I-C Child Maltreatment 2007 Summary** or http://www.acf.hhs.gov/programs/cb/stats_research/index.htm#can.)

Since its inception, NCANDS has been the primary source of national statistics on child maltreatment and is widely used by the Federal government. Some examples are given below.

- Data from the Child File, the Agency File, and the SDC are used in the Child and Family Services Reviews, conducted by the Children’s Bureau, as required by the Adoption and Safe Families Act. Data also are used by the States used when designing their Performance Improvement Plans (PIPs) and by the Children’s Bureau in monitoring their performance. (See **Attachment I-D National Safety Profile 2005–2007** or <http://www.acf.hhs.gov/programs/cb/cwmonitoring/index.htm#cfsr>.)
- The Children’s Bureau uses data from the Child File and the Agency File 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). Data are used for PART reporting on the Child Abuse and Neglect State Grant and the Community-Based Grants for the Prevention of Child Abuse and Neglect (CBCAP), both funded under CAPTA. (See <http://www.whitehouse.gov/omb/expectmore/detail/10002142.2004.html> for more information on the PART measures for the CBCAP.)
- The Department of Health and Human Services uses data from all three files in the annual child welfare outcomes report to address the context of child abuse and neglect as well as document performance on two outcome measures. The most recent report to the Congress is the *Child Welfare Outcomes 2002–2005*. (See http://www.acf.hhs.gov/programs/cb/stats_research/index.htm#cw.)
- The U.S. Bureau of the Census includes data from the Child File and the SDC in its annual compilation of national statistics, *Statistical Abstract of the United States*. (Available at <http://www.census.gov/compendia/statab/>.)

Data from the Child File are used to support other Federal research efforts. The ongoing National Study of Child and Adolescent Well-Being used Child File data to design its sampling strategy and to confirm its weighting design. The Fourth National Incidence Study (NIS-4) also relied upon the Child File data in developing its sampling framework. On April 4, 2008, the Children’s Bureau and the Centers for Disease Control issued a joint article in the *Morbidity and Mortality Weekly Report (MMWR)* on nonfatal child maltreatment cases of infants. (Available at <http://www.cdc.gov/mmwr/preview/mmwrhtml/mm5713a2.htm>.)

If the term “National Child Abuse and Neglect Data System” is entered into an Internet search engine, such as Google, more than 1,500,000 citations are found. NCANDS data 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 Web site are from NCANDS.

3. Use of Improved Information Technology and Burden Reduction

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

The main information collection instruments are the case-level Child File, and the aggregate-level Agency File. (These two instruments have been referred to as comprising the Detailed Case Data Component, but this terminology is no longer used.) States that are unable to submit a case-level data file, submit the Summary Data Component (SDC).

The Child File records are transmitted electronically in American Standard Code for Information Interchange (ASCII) format. Each record contains standardized data pertaining to a child who has received an investigation pertaining to a specific report alleging maltreatment. States submit these data in one file via a portal (NCANDS Portal) that was established for secure transmission of State data. A State can only navigate to its own State-specific site; and access to other State sites is blocked. The submitted data files are processed through NCANDS edit and quality control programs. Nearly 400 validation rule applications are performed as 145 base validation rules are tested against the data in the file. The results of these rule applications are captured and errors and inconsistencies in the data transmission are communicated to each State via the NCANDS Portal and usually resolved with minimal effort. If necessary, a State resubmits its data. Communication with each State is conducted via e-mail, NCANDS Portal, and telephone. The NCANDS Portal is used to archive data for the use by the States, as well as by NCANDS. Documentation on each submission also is maintained. States have found that the NCANDS Portal decreases their time spent in managing their data files and their documentation. States are provided with annual updates of the validation program, so that they can validate their Child File data prior to submission. The latest validation program and instructions can also be obtained from the NCANDS Portal.

The Agency File data are submitted to NCANDS via the same portal. Agency data are aggregated data submitted via tabbed data entry screens designed similarly to a questionnaire. Helpful instructions are provided as callouts for each question or data item. Data can be saved in multiple sessions and submitted when all data are collected. A State can download the data entered in MS Word format. The NCANDS Portal also provides the feature to compare to previous years data and the comparison template can be downloaded in MS Excel format. The State has the ability to resubmit the data file in this same manner, if needed. Furthermore, a State can track the status of its data submission from the time data are first saved until it is finally accepted. The SDC data, also aggregated data pertaining to child maltreatment, are submitted in a manner similar to the Agency File data.

4. Efforts to Identify Duplication and Use of Similar Information

The Children's Bureau data collection efforts are recognized as being the primary source of national child protective services statistics and trends on child maltreatment at the State level. There are no other comparable national efforts in the United States. Indeed, other studies, with the approval of the Children's Bureau and the States, are incorporating already submitted NCANDS data in their research to avoid duplication in their studies.

Two other major national studies have used NCANDS Child File data in this manner.

- The National Study of Child and Adolescent Well-Being (NSCAW) is a longitudinal study of a national sample of children who have been involved with the child welfare system. The study surveys the children and their parents about their outcomes and services received. A minimum of child protective services data are collected from the families. The current wave of data collection receives copies of the Child Files, which States already have submitted to NCANDS, to supplement the NSCAW survey data. State burden to participate in NSCAW is therefore reduced.
- The Fourth National Incidence Study (NIS-4) develops estimates of child maltreatment based on a sample of sentinels who may or may not have reported the maltreatment to child protective services. The recent design and analysis of NIS-4 included using NCANDS data to construct the sampling frames and the sampling weights. In addition, a study was conducted to compare national estimates based on NIS-4 methods and NCANDS methods in order to identify any future means of strengthening either approach. Data already submitted to NCANDS by the States were used in both studies. No additional burden or duplication of effort occurred.

Over the past several years, study designs, which 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 via the NCANDS Agency File, Child File, or SDC.
- 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 child abuse and neglect. The pilot system parallels NCANDS to the extent appropriate for the tribes. Four tribes participated in this project. Currently, tribes are discussing whether they will participate directly with NCANDS and thus reduce burden and any possibility of future duplication.
- The Centers for Disease Control and Prevention (CDC) has conducted 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.

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 foster care and adoption data reference are collected through 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 or 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.

The two data collection efforts are distinct in term of the populations that they address, but there is some overlap. NCANDS collects data on children who receive an investigation or assessment response from the State or local child protective services agency due to an alleged maltreatment. AFCARS collects data on children who have been in foster care under the care and supervision of the State title IV–B/IV–E agency. The overlap occurs if a child who receives an investigation also is removed from his home. Therefore terms that are in both data collection systems are commonly defined. For example, both AFCARS and 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 Federal fiscal year, 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. These 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 by NCANDS 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. States do not consider these data or the additional field pertaining to the AFCARS ID as burdensome or duplicative. Indeed they are useful in some current analyses already underway by the Children’s Bureau.

5. Impact upon Small Businesses or 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. No difference is made according to the population of the State in order to acquire national data.

6. Consequences of Collecting the Information Less Frequently

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 *Child Welfare Outcomes* mandated by section 203 of the Adoption and Safe Families Act, 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. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Special circumstances are discussed below.

- *Report Information 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 extract their data submission from their administrative databases, their source data are maintained for State purposes. NCANDS archives each State's submission and can provide the State with a specific prior data submission, if needed. States do not need to retain their submissions.
- *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 identifying data, such as name, address, or Social Security

number, are collected. Each State ensures 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.

A Privacy Act "system of records" is defined as "a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual" (The Privacy Act of 1974, 5 U.S.C. § 552a). NCANDS does not fall under Privacy Act system of records requirements. No identifiable data are collected or maintained.

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

A Federal Register announcement soliciting comments on renewing approval for the collection of NCANDS data was published on May 1, 2009, (Volume 74, Number 83, pp 20319–20320). All States were informed of the announcement. Only one State provided comments. Kansas reported as follows.

- (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. Response: *Kansas does use the information reported through NCANDS and especially information on child fatalities and data pertaining to CFSR outcomes for safety.*
- (b) The accuracy of the agency's estimate of the burden of the proposed collection of information. Response: *Approximately 160 hours per year with programming, file runs, data quality checks, etc.*
- (c) The quality, utility, and clarity of the information to be collected. Response: *No comments.*
- (d) Ways to minimize the burden of the collection of information. Response: *No additional data elements or changes to the existing data/file.*

This request takes into consideration all points made by Kansas. The burden estimates under item #12 have taken into consideration their feedback, as well as other feedback.

States have continued to be supportive of NCANDS. By June 30, 2009, 48 States had submitted the Child File, 46 had submitted the Agency File, and 2 had submitted the SDC. This is an improvement in timeliness from past years and serves as an indication of the State voluntary support for NCANDS.

The Children's Bureau has engaged States and other interested parties in discussing improvements to the NCANDS through many venues. Each year a NCANDS State Technical Assistance Meeting of all State representatives is held

in the fall or winter and a State Advisory Group Meeting of approximately 20 States is held in the summer. At a 2008 State Advisory Group Meeting and at the most recent Technical Assistance Meeting, potential changes were discussed in detail. Furthermore, all States reviewed documents that discussed various changes and many State representatives participated in various workshops that discussed the merits of possible changes. (See **Attachment I-E Consultation List.**) At this time no changes are being recommended.

9. Explanation of Any Payment or Gift to Respondents

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

10. Assurance of Confidentiality Provided to Respondents

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. Justification for Sensitive Questions

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

12. Estimates of Annualized Burden Hours and Costs

The annual burden estimate is shown below.

| INSTRUMENT | NUMBER OF RESPONDENTS | NUMBER OF RESPONSES PER RESPONDENT | AVERAGE BURDEN HOURS PER RESPONSE | TOTAL BURDEN HOURS |
|--------------------------------|-----------------------|------------------------------------|-----------------------------------|--------------------|
| Child File (Part of the DCDC) | 50 | 1 | 80 | 4,000 |
| Agency File (Part of the DCDC) | 50 | 1 | 24 | 1,200 |
| Summary Data Component | 2 | 1 | 32 | 64 |

Estimated Total Annual Burden Hours: 5,264

These estimates are based on experience of States who have provided data in the past. It is premised on the expectation that 50 States will submit the Child File and the Agency File and 2 States will submit the SDC at least for 2 more years. While the estimates for the Agency File and the SDC are quite consistent across States, the estimates for the Child File vary greatly. This is because States expend varying amounts of time completing their data submissions. Some States are more conscientious than others; some add additional data each year. The estimates are based upon those States which invest considerable attention to submitting a comprehensive file.

The annual burden is based upon an average hourly salary of \$40.00 for State programmatic staff and \$60.00 for State information technology (IT) staff. Across

all respondents, for the Child File, the programmatic staff burden is estimated at 1,500 hours (or 30 hours per respondent) at \$40.00 per hour for a total of \$60,000; the IT staff burden is estimated at 2,500 hours (or 50 hours per respondent) at \$60 per hour for a total of \$150,000. Across all respondents, for the Agency File, the programmatic staff burden is estimated at 960 hours (or 19.2 hours per respondent) at \$40.00 per hour for a total of \$38,400; the IT staff burden is estimated at 240 hours (or 4.8 hours per respondent) at \$60.00 per hour for a total of \$14,400. Across all respondents for the SDC, the programmatic staff burden is estimated at 32 hours (or 16 hours per respondent) at \$40.00 per hour for a total of \$1,280; the IT staff burden is estimated at 32 hours (or 16 hours per respondent) at \$60 per hour for a total of \$1,920. The grand total estimated annual cost is \$266,000.

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

Because the NCANDS data collection effort depends upon the State administrative information systems, most States do not incur many 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.

All States will incur slight additional programming hours in order to modify their programs for their changing IT environment, to add additional information to their databases, or to revise their extract programs. These would be one-time costs for the Child File. It is estimated that each State may incur approximately 3.2 hours of programming time at \$72 an hour. The total costs incurred by the States would be \$138,240.

14. Annualized 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 | \$ 175,000 | \$ 180,000 | \$ 185,000 | \$ 180,000 |
| Contractor Staff | \$1,435,320 | \$1,486,495 | \$1,539,508 | \$ 1,487,108 |
| Total | \$1,610, 320 | \$1,666,495 | \$1,724,508 | \$1,667,108 |

The above costs are based upon the use of contractor staff to collect, validate, process, and analyze the Child File, Agency File, and SDC data, as well as provide briefings and prepare the annual report. Contractor staff 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. In addition, contractor staff provide support to other Departmental data reporting initiatives, including the Child and Family Services Reviews and the annual report on child welfare outcomes. Federal staff direct and monitor all efforts.

15. Explanation for Program Changes or Adjustments

The annual burden estimate for 2006–2009 was 6,068 hours. The annual burden estimate for 2009–2012 is 5,264 hours. The adjustment is due to the increased familiarity with the data files.

The annual costs estimate for 2006–2009 was \$106,000. The annual average cost estimate for contractor costs especially for this effort for 2009–2012 is \$138,240. This adjustment is due to the need for States to update their extract programs, as their systems change and as they are able to provide better data to NCANDS.

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

The highlights of the annual data collection schedule are as follows: December 31—send out requests for data; March 31—all data submissions due; August 31—validation cycle completed including any data resubmissions; and April 1—annual report released.

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

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions to the above certification are being sought.

B. Statistical Methods (used for collection of information employing statistical methods)

1. Respondent Universe and Sampling Methods

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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