

PAPERWORK REDUCTION ACT SUBMISSION

SUPPORTING STATEMENT

Agency: Office of Juvenile Justice and Delinquency Prevention (OJJDP)
Title: Census of Juveniles in Residential Placement (CJRP)
Form: CJ-14
OMB No.: 1121-0218 (approval expired 1/31/2009)

A. JUSTIFICATION

1. Circumstances of the Collection.

OJJDP is seeking reinstatement without change of the Census of Juveniles in Residential Placement data collection form (CJ-14). This census will be sent to facilities that hold juvenile delinquent and/or juvenile status offenders. It requests information on juvenile offender characteristics (age, sex, race), and state of origin. It is a biennial survey conducted in odd numbered years. It complements the Juvenile Residential Facility Census (JRFC), a census of the same facilities which requests information on the operations and services of the facilities and is administered in alternate years. The CJRP has been collected in 1997, 1999, 2001, 2003, 2006,¹ and 2007.

Since 1971, the Department of Justice has taken a strong interest in juveniles in custody, the operation of the facilities in which they are located and the services available to them while in custody. In 1971, the Department began a census of juveniles in custody known as the Children in Custody Census (more formally: *The Census of Public and Private Juvenile Detention, Correctional, and Shelter Facilities.*) In 1974, the Office of Juvenile Justice and Delinquency Prevention (OJJDP) took over that census. In 1993, OJJDP began a broad, long-term examination and revision of its data collection efforts covering juveniles in custody. This effort included extensive consultation with experts interested in the data produced, discussions with respondents, and extensive testing of questions and methodologies. In 1997, OJJDP conducted the first Census of Juveniles in Residential Placement (CJRP), the end-product of this long-term effort.

¹ A delay in submitting the OMB Package for the 2005 collection meant that OJJDP had to reschedule the collection until after approval was received. Approval was received in December 2005, and the collection occurred in February 2006. The collection returned to the regular schedule (October) for 2007 and is scheduled to occur in February again for 2010.

OJJDP is authorized to conduct this data collection under the Juvenile Justice and Delinquency Prevention Act of 1974, as amended (the JJDP Act). The JJDP Act was Reauthorized in November 2002 as part of Public Law No: 107-273 and took effect in October 2003. For purposes of this PRA request, the relevant part of the reauthorization language reads as follows:

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

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

A(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.

B42 U.S.C. 5661

The JJDP Act also includes a requirement that OJJDP's Administrator submit to Congress and the President an annual report on juveniles in custody. The specific language which describes this report follows:

(1) A detailed summary and analysis of the most recent data available regarding the number of juveniles taken into custody, the rate at which juveniles are taken into custody, and the trends demonstrated by the data required by subparagraphs (A), (B), and (C). Such summary and analysis shall set out the information required by subparagraphs (A), (B), (C), and (D) separately for juvenile nonoffenders, juvenile status offenders, and other juvenile offenders. Such summary and analysis shall separately address with respect to each category of juveniles specified in the preceding sentence—

(A) the types of offenses with which the juveniles are charged;

(B) the race and gender of the juveniles;

(C) the ages of the juveniles;

(D) the types of facilities used to hold the juveniles (including juveniles treated as adults for purposes of prosecution) in

custody, including secure detention facilities, secure correctional facilities, jails, and lockups;

(E) the number of juveniles who died while in custody and the circumstances under which they died; and

(F) the educational status of juveniles, including information relating to learning disabilities, failing performance, grade retention, and dropping out of school.

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--42 U.S.C. 5617

Copies of the relevant sections of the JJDP Reauthorization are included under Section 7 of this PRA package.

2. Purpose of the Information

The data collected from the CJRP has and will continue to inform the nation's understanding of youth placed out of the home due to some contact with the justice system. These youth may be held in shelter facilities, detention centers, alternative placements, or more traditional secure training schools. No other single data collection, national or State-level, collects the quality or volume of information gathered by this census. Specifically, the CJRP collects information on the following:

- The offense characteristics of youth in custody,
- The racial breakdowns of these youth,
- The youth's State of origin,
- The age and gender distribution of these youth,
- The placing agencies for these youth and the government level, and
- The legal status of this population including detention and commitment.

The specific content of this data collection was developed through a rigorous process in which OJJDP determined precisely what data are required to routinely monitor the population of youth in custody 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.

OJJDP continues to consult with the data providers and others in the juvenile justice and corrections field to ensure that the information being collected is relevant and useful. See item 8 of the Supporting Statement for more information regarding consultation with experts and others. OJJDP also works diligently to ensure that CJRP findings are made available to practitioners in the field and the general public as soon as possible. See item 16 for more information about dissemination of results.

3. Use of automated, electronic, mechanical or other technological collection techniques

OJJDP and the Census Bureau are committed to decreasing the burden of the data collection on respondents. The Census Bureau has taken advantage of all available electronic means of data submission in the past, as this option typically reduces the burden and costs on both the respondent and the data collectors, the Census Bureau. Along with these savings, the data are cleaner

and less prone to error when taken directly from the respondents' own systems.

Plans for electronic submission of data for the CJRP began during the design phase in 1996. Since the first CJRP collection in 1997, OJJDP and the Census Bureau have encouraged submission of electronic data. To date, with each initial mailout, OJJDP has provided all respondents with an automated submission guide at which offers specific guidance and instructions on who to submit data to Census Bureau. The Census Bureau has been committed to accepting all formats of data submission, including:

- Respondents' own spreadsheet packages;
- Respondents' own management information systems; and
- Data in ASCII text.

As part of the collection process, the Census Bureau also encourages respondents with questions to call an 800 number to determine whether other electronic submission methods will work.

For the 2010 CJRP collection, the Census Bureau will provide an online web reporting form option. The purpose of this option is to reduce the burden on respondents. The Census Bureau has maintained a focus on the sensitivity of CJRP data when developing the new web form. The Census Bureau's secure servers use "HTTPS", Hypertext Transfer Protocol over Secure Socket Layer, to ensure the encrypted transmission of data between the respondents' browser and the U.S. Census Bureau. This means that instead of sending readable text over the Internet, both the respondents' and the Census Bureau's server encode (scramble) all text using a security key. That way, personal data sent to the respondents' browser or data the respondent sends back is extremely difficult to decode in the unlikely event it was intercepted by an unauthorized party. All browsers connecting to the Census Bureau's secure server must use a minimum encryption key size of 128 bits.

All respondents who use the web reporting form option will be required to create a unique password containing a minimum of the following: 12 characters in length, 1 uppercase character, 1 lowercase character, 1 number, and 1 special character from the following: ! # \$ * \$? ~. Passwords will be valid for a period of sixty days. All respondents will be locked out of the website upon submission of their data and accounts that have been inactive for a period of 45 days will be disabled.

Prior to beginning data entry, respondents will be required to acknowledge having been provided with the statement of statutory and policy protections of confidentiality, as well as the burden statement information offered in the paper cover letter that accompanies the mailed (paper) CJRP form.

4. Efforts to identify duplication

OJJDP takes numerous steps to uncover all sources of information on youth involved in the juvenile justice system. Through the Juvenile Justice Clearinghouse, an information clearinghouse on issues and resources regarding youth programs, research and datafiles, OJJDP has learned that national information on the conditions of confinement, availability of services and the safety and security of juveniles in facilities is not available through any other national data collection. Similarly, conversations with staff from other Federal agencies have revealed that no data collection exists in any other Federal agency that could supply this data routinely and completely. Indeed, other Federal agencies tend to turn to OJJDP for information on juveniles in correctional facilities.

Both the Census Bureau and OJJDP conducted extensive literature reviews during the development of this census, and have continued to monitor the research literature as the CJRP has been administered. All such reviews have indicated that this information is not independently available through other means. Some States or localities maintain similar information, yet it can be far from complete. In any event, such localized information sources do not cover the entire country, which is the intent of the CJRP.

5. Impact on small businesses and small entities

Small businesses are not involved in this data collection.

6. Consequences of not conducting the data collection

If this data collection does not proceed, it is expected that OJJDP would not have the capacity to respond to Congressional and Presidential reporting mandates for the Office; that larger, more burdensome data collections would be needed to address the issues covered in this collection; and that Federal, State, and local policy makers would need to rely more on anecdotes and assertion rather than solid data in developing juvenile justice policy. Without this data collection, comparable national and State level data would not be available. Without these data OJJDP, Federal, State and local agencies would not have the necessary foundation to develop programs for youth in residential placement.

In the past (prior to the CJRP), OJJDP relied on the *Census of Public and Private Juvenile Detention, Correctional, and Shelter Facilities* to provide information on all aspects of juvenile residential facilities. As an explicit decision, the Office separated the new data collection effort into two separate censuses: the Census of Juveniles in Residential Placement (CJRP) collects population information on juveniles in residential facilities, and the Juvenile

Residential Facility Census (JRFC) is designed to collect facility level information.

7. Special circumstances

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

- The data collection is biennial (not quarterly or more frequently);
- Respondents will have more than 30 days to respond;
- Only one copy of the document will be requested;
- The collection does not require respondents to maintain records beyond the data collection itself;
- The collection is designed to be a census of juveniles in custody on the reference date 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 Attachment A for *42 U.S.C. 3789g*);
- The collection does not request proprietary information.

8. Outside consultation

- a. The data collection was announced in the Federal Register by the Department of Justice in accordance with 5 CFR 1320.8(d). As a result of Federal Register notification, One public comment was received regarding the Census of Juveniles in Residential Placement (CJRP) data collection. Judith Storandt of the National Disability Rights Network (NDRN) submitted a letter requesting that OJJDP revise the Census of Juveniles in Residential Placement (CJ-14) form—and the companion Juvenile Residential Facility Census (CJ-15) form—to provide “appropriate definitions for each of the facility-type categories” under the relevant question for each form. Ms. Storandt’s letter stated that the lack of definitions “reduces the significance and usefulness of the data.” Ms. Storandt also offered to “serve on a work group to assist in drafting definitions for this purpose.”

Response:

The issue of how best to address juvenile facility classification in OJJDP’s corrections data collections is an ongoing challenge. Facility classifications (without specific definitions) were first developed by the U.S. Census Bureau and the Bureau of Justice Statistics (BJS) in the initial 1971 Children in Custody (CIC) Census, formally known as the Census of Public Juvenile Detention and Correctional Facilities. (Private facilities were later added to this collection.) In these collections, facilities classified themselves.

To address the lack of specificity in definitions, and the variability of facilities within self-defined facility types, an attempt was made to address this problem initially, analytically, through the creation of complex algorithms to reclassify all facilities into short-term/long-term, open/institutional environments using a number of descriptive and analytical variables from the data set. This process provided somewhat greater clarity in terms of a more consistent, uniform grouping, but the feedback received from the juvenile justice field was that they did not recognize themselves, or other facilities, with this new construct. So, OJJDP discontinued this classification process.

Later, an effort to resolve the classification problem was undertaken by the Census Bureau in the mid-1990s as part of the redesign of OJJDP's correctional statistics program. OJJDP worked with the Census Bureau to conduct cognitive testing of the facility classification structure in the development of the Juvenile Residential Facility Census (JRFC) and the Census of Juveniles in Residential Placement (CJRP). The results from this effort found even more variability in classification as facilities had begun taking on multiple functions within a single residential campus/building (such as a single facility serving both pre-adjudicatory and post-adjudicatory placement functions, either of which could include both detained and committed youth in either functional unit). As a result of this research and testing, a decision was made to allow facilities to check all of the functions that they performed (per the self-classification criteria).

OJJDP has also taken efforts to clarify the facility classification of "residential treatment center." This classification was in the original CIC collection, but was later removed as a facility type because response analysis indicated that respondents were selecting this category because it appeared more positive than other options (e.g., "training school"). It also became evident that many facilities were selecting it, even when no treatment services were being provided. Following the cognitive testing that accompanied the collection redesign in the mid-1990s, the "residential treatment center" category was put back in to the new CJRP in 1997, with additional options (with and without on-site mental health care). To provide further clarity, in 1999, "residential treatment center" was removed as a category in the self-classification list and instead there was a set of lead in items added to the data collection: "does this facility provide on-site residential treatment?" and if so, "what kind of treatment is provided?" with a list of types. In 2003, the "residential treatment center" option was added back to the self-classification list (and the lead-in questions remained). Since then, no additional changes have been made to this part of the forms.

Proposed Resolution

While OJJDP does not provide definitions in the CJRP for respondents, OJJDP's Statistical Briefing Book glossary does include general definitions for users (see <http://ojjdp.ncjrs.gov/ojstatbb/ezacjrp/asp/glossary.asp#FacilitySelf>). To provide guidance to respondents, OJJDP will provide a link to these definitions in the CJRP 2010 form; these definitions provide general characteristics for the different facility types. Providing more definitive definitions would require a more in-depth analysis and would not be possible in time for the 2010 collection. OJJDP has not recently conducted a detailed assessment of what specific characteristic(s) would be used to categorize facilities, or, recategorize a detention center into a residential treatment center and vice versa. However, the development of an improved facility classification scheme could be put on OJJDP's corrections research agenda. In addition, since OJJDP recently announced the desire to have practitioner feedback through a juvenile custody advisory board, Ms. Storandt's offer to provide guidance through this process would be welcomed. OJJDP would anticipate that the results of a detailed assessment and feedback from the field would be conducted over the next 12-18 months and be available for implementation by the next (post 2010) CJRP data collection.

b. Consultations outside the Office

During the development phases of this project, OJJDP consulted extensively with several experts in the field. These consultants provided expert advice on the operations and population of the specific facilities. Additionally, OJJDP revisits the form after each collection to determine the value of the information being collected, the phrasing and content of questions, and the form structure. OJJDP also relies on experts in the field of juvenile corrections to advise the agency regarding needed changes, deletions or additions to the form. This information is gathered through periodic phone calls of the "OJJDP Corrections Data Working Group," as well as through conferences, regional meetings with State Juvenile Justice Specialists, and internal agency meetings. A list of the individuals directly involved in advising OJJDP on an ongoing basis regarding the CJRP and other data collection activities is included in Attachment B.

OJJDP conducted an Institutional Review Board (IRB) meeting in 2007 to review the human subjects implications of the CJRP. The materials from that meeting are in Attachment C. The IRB is doing another review for the February 2010 CJRP collection. Materials associated with that review are also included in Attachment C. OJJDP anticipates the results of that review will be available in early January 2010.

In 2010, OJJDP intends to initiate a Juvenile Corrections Data Collection Advisory Board to inform the agency=s various data collection efforts, including the CJRP. It is expected that the membership of this Board will be multidisciplinary and will include experts from the fields of juvenile facility operations, corrections administration, research and data collection, as well as juvenile service needs (mental health, physical health, education, etc.).

c. Consultations with data providers

From 1993 through 1998, OJJDP and the Center for Survey Methods (CSMR) at the Census Bureau worked to develop and improve the CJRP questionnaire. During this time, staff at CSMR visited over 50 individual facilities asking very specific questions about the operation of the facility, the format of the questionnaire, and the facility=s ability to complete the form. Important also during the testing was the burden placed on the respondents because both OJJDP and CSMR understood fully that an overburdensome form would result in high nonresponse rates.

Since the first collection in 1997, OJJDP and the Census Bureau have developed a broad range of formal and informal relationships with the data providers. These data providers serve as a network of support for the project by providing updates on facility lists, comments on publications, information on juvenile corrections, and reviewers for questionnaire drafts. Since its first administration in 1997, the Census Bureau has worked with several data providers to help them set up reporting systems that fit with the CJRP reporting mechanisms, thereby decreasing the burden on a number of the data providers.

In Summer 2009, OJJDP sponsored a workshop at the National Archive of Criminal Justice Data (University of Michigan). The workshop, entitled, "Using National Juvenile Corrections Data Files, 1997-2006," provided attendees with an opportunity to learn how to analyze these multiyear files using a secure online data analysis tool. (See Attachment E.)

9. Justification of compensation

OJJDP does not compensate respondents who participate in this data collection. Participation is 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 A. Regulations implementing this legislation require that OJJDP staff and contractors maintain the confidentiality of the information and specify necessary procedures for guarding this confidentiality. These regulations (28 CFR Part 22) are also included at Attachment A. The cover letter that accompanies the CJRP notifies 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 6 of this package, along with the CJRP form itself.

11. Justification for sensitive questions.

This data collection does not contain sensitive questions.

12. Estimates of hour burden

Based on the national field test and the previous administrations of the CJRP, OJJDP estimates the average time to complete the form to be three hours. Due to differences in facility characteristics, staffing and population housed, not all facilities will have the same hour burden. For example, some facilities will submit their data electronically while others will submit it manually. In addition, approximately 65% of the CJRP facilities are private facilities, and 35% are public facilities. However, most juveniles are housed in public facilities (about 70% of juveniles are residing in public facilities on the reference date). This means that public facilities, on average, house more juveniles. Therefore, the burden for a public facility to submit data manually is likely to be greater than the burden for a private manual provider. The following table provides an overview of the hour burden estimates by type of data provider (manual or electronic) and facility type:

Estimated Hour Burden for the CJRP

Data/Facility Type	Number of facilities	Hour burden per facility	Total hours
Manual Data Providers			
Public Facilities	700	8 hours	5600
Private Facilities	2,000	2 hours	4000
Electronic Data Providers			
Public Facilities	500	3 hours	1500
Private Facilities	300	1.5 hours	450
Total Response Burden (Hrs)			11,550
Estimated Average Response Burden	3,500		3 hours

Note: These estimates are based on the average population in each facility and an estimated time to report for each individual in that facility. For manual reporters, we have used an estimate of 10 minutes to report on each juvenile. For electronic reporters, we have used an estimate of 3 minutes for each juvenile. These estimates include the time needed to read and understand the directions, to collect the information, and to respond.

13. Estimates of cost burden

The form was 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 CJRP from 1997 through 2007, the following table provides an overview of the costs of implementing the JRFC. Please note that although the data collection for CJRP occurs every other year, for Aoff@ years there are still costs incurred due to data processing and completing data collection closeout.

Fiscal Year	Cost
1997	\$630,000
1998	\$200,000
1999	\$672,500
2000	\$200,000
2001	\$673,000
2002	\$200,000
2003	\$685,000
2004	\$200,000
2005	\$757,000
2006	\$243,000
2007	\$811,000

On average, the annual cost of the CJRP to the Federal government is \$479,227. The costs of the survey fluctuate from year to year, peaking in the years the census is conducted and declining in the off years.

15. Reasons for program changes

This application includes no new changes to the previously approved questions.

16. Plans for tabulation and publication

OJJDP has developed a comprehensive system for analysis and distribution of the information collected. Under this plan, OJJDP funds a grant with the National Center for Juvenile Justice (NCJJ) for the National Juvenile Justice Data Analysis Project (NJJDAP). The NJJDAP analyzes the CJRP data and produces standard fact sheets, bulletins, and reports for publication by OJJDP. A primary way that the data are released are via OJJDP's online Statistical Briefing Book, located at <http://ojjdp.ncjrs.org/ojstatbb/index.html>

OJJDP is making the CJRP datafiles available for use by other researchers through the National Archive of Criminal Justice Data (part of the Inter-university Consortium for Political and Social Research at the University of Michigan). This effort is designed to promote the publication of research findings from the CJRP, and increase its utility to the field. As part of this effort, OJJDP sponsored a workshop in Summer 2009 to introduce researchers to the data files and the types of questions to be answered (see Attachment E).

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.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This data collection will be a census of juveniles in custody on the reference data. In the best of all possible scenarios, statistical estimation would not be required. However, given the inevitable facility non-response and item non-response, OJJDP (as in previous years) will work with the Census Bureau to ensure valid and reliable procedures to estimate the population characteristics.

1. Respondent Universe and Sampling Methods

For this census, OJJDP has defined the universe to include all facilities that hold juvenile offenders as offenders. An offender is defined as a youth who has committed a crime or status offense² and who is being held because of that offense. It is important that the juvenile be held for the offense and not for some other problem behavior such as alcohol or drug abuse. Also, it is important that the facility specifically be holding the youth for the offense. OJJDP has defined juveniles to be any person under 18 years of age although many States define the age of majority differently (e.g., 16 in New York, 17 in Wisconsin).

OJJDP intends to survey all public and private facilities in the United States that fulfill these requirements. The 2007 CJRP included a total of 2,911 facilities: 1,173 public and 1,738 private residential facilities. These facilities run the gamut of environments from open facilities in which the youth reside in a home environment to the high security training schools that house upwards of 400 youth.

OJJDP has determined that a census will serve the government's interest better than a sample survey. Based on the input from OJJDP's outside consultants, the Office determined that a nationally representative sample of facilities would not suffice. States wish to make comparisons among themselves, and given that juvenile justice policy is made at the State level, a national sample would not serve their purposes. Most States have only a few facilities (some with one or two). In order to create a sample that would suffice for making adequate State level estimates, OJJDP would in effect conduct a census in many States. Thus, to create the State level estimates of residential placement would almost require a national census.

²Status offenses are those offenses which are illegal for minor but not for adults. For example truancy or running away may be a status offense depending on the State in which the juvenile resides. Other status offenses include incorrigibility, underage drinking, or curfew violations.

2. Information Collection Procedures

To maintain an accurate and complete list of all facilities that are of interest, OJJDP annually funds a broad agreement with the Census Bureau to maintain a list of facilities that includes the name, address, location, phone numbers, email addresses and classification information. To maintain this list, the Census Bureau examines resource materials from professional organizations and State organizations, as well as periodically contacting agency personnel in the States able to provide information on new facilities, facility closings, and changes in facility characteristics.

As for the actual collection of the information, through the Census Bureau, OJJDP will pursue the following schedule:

Time frame	Action
4 weeks prior to reference date	mailout advance notice letter
2 weeks prior to reference date	mailout survey forms
1 week following reference date	mailout reminder letters (non-respondents only)
4 weeks following reference date	mailout a second-notice survey form (non-respondents only)
6 weeks following reference date	begin telephone follow-up

This schedule was developed based on experience with other censuses and experience in testing and administering the CJRP in previous years. Should circumstances require changes (most likely to move forward the telephone follow-ups), the schedule will be changed accordingly.

Typically, OJJDP has been able to achieve a high response rate (85-95 percent) for its facility based censuses. Such a level of response has proven sufficient for the designated analysis purposes. The Office expects to continue such a high response rate in future administrations of the CJRP.

3. Methods to Maximize Response Rates

OJJDP and the Census Bureau are committed to very high response rates and high quality data. For many years, the CJRP collection resulted in high response rates. In 2007, there were a total of 2,911 “in scope” facilities in the universe. For the 2007 CJRP, the response rate was 76% (full response), representing 2,215 respondent facilities. An additional 687 facilities provided “critical item information” and 9 facilities did not respond. Over the past few collection periods, the CJRP has experienced a reduction in the percentage of full responders, and an increase in the percent of “critical item” responders, necessitating that we need to impute for an increasing proportion of the universe on several key variables. Specifically, this means imputation rates have increased significantly over the past few survey cycles for juvenile facilities that hold persons under age 21 that are charged with or court-adjudicated for an offense. The gradual trend has become a source of concern for subsequent survey cycles. If the trend continues, imputed data will make up such high percentage of the final data file that the quality will be compromised. As a result of these concerns, OJJDP is in the process of launching a new “client development” effort to enhance retention and increase full respondent rates. This client development effort will utilize staff from OJJDP’s corrections data advisory group in exploring and possibly utilizing the following techniques:

- Electronic reporting in a manner acceptable to the respondent (Census Bureau is currently exploring a more user friend online reporting mechanism)
- Streamlined forms and clear response instructions
- Continued support at the Census Bureau through a toll free number to answer any questions that arise
- Continuous contact with respondents through email and paper mail (see the schedule for mailout and reminder notices above)
- Call-back procedures that continue until data close-out in April/May of the following year.

Many of these respondent development activities have been used successfully in engaging the respondent universe for another OJJDP data collection – the Census of Juveniles on Probation (1121-0291). OJJDP anticipates a renewed effort at respondent engagement through these methods will yield positive outcomes.

4. Tests of Procedures

The development of the CJRP followed a solid development design. The Center for Survey Methods Research at the Census Bureau began with semi-structured exploratory interviews of 20 respondents. The respondents were varied based on size and type of facility. These interviews were designed to learn how respondents think about the population in their facilities and how they understand

various important concepts OJJDP wishes to report on (for example, delinquent versus status offense).

Results of these interviews informed the development of a test instrument which was reviewed and refined by OJJDP staff and a group of consultants. CSMR used the refined draft instrument to conduct multiple rounds cognitive interviews with respondents. Based on these interviews, CSMR and OJJDP produced an instrument for pre-testing. Using a reference date of October 30, 1996, the Governments Division of the Census Bureau conducted a pre-test of 400 facilities. This test included a small sample of facilities (96) that would receive the CIC form so that CSMR could compare the results of these two tests to more accurately judge how the CJRP form performed compared to the CIC. Statisticians at the Center for Survey Methods Research (CSMR) at the Census Bureau analyzed the data and provided a report to OJJDP.

Since the first full administration of the CJRP in 1997, OJJDP has worked with the Census Bureau to establish and maintain appropriate statistical procedures for the data files. As part of the normal procedures for each CJRP file, the Economic Statistical Methods and Programming Division (ESMPD) of the Census Bureau analyze the quality of the data and develop methods for imputing for facility non-response and item non-response. ESMPD provides a detailed report for each file. This report demonstrates the quality of the data collection efforts and the procedures the Governments Division uses to collect the CJRP data. The Imputation Report for the 2007 collection is included in Attachment D.

5. Statistical Consultants

Presently, OJJDP funds an Interagency Agreement with the Governments Division at the Census Bureau to perform data collection, and to maintain the data file and address lists. This IAA also funds the imputation activity (ESMPD) related to the CJRP file.

OJJDP also funds an IAA with George Mason University for field testing of questions and form design issues, as well as a grant with the National Center for Juvenile Justice to perform initial analysis of the CJRP data file, and to produce summary findings for publication and online dissemination.

Relevant Contacts:

Stephen Simoncini
Governments Division
U.S. Census Bureau
Washington, DC 20233
(301) 763-1549

Suzanne M. Dorinski and Carma Hogue
ESMPD
U.S. Census Bureau
Washington, DC 20233
(301) 763-4869

Catherine Gallagher
Assistant Professor
Department of Public and International Affairs
George Mason University
Fairfax, VA
(703) 993-8480

Melissa Sickmund and Charles Puzzanchera
National Center for Juvenile Justice
Pittsburgh, PA
(412) 227-6950