

Permanency Innovations Initiative

**Pretesting of Evaluation Surveys
(OMB 0970-0355)**

Supporting Statement Part A

September 2011

A. JUSTIFICATION

The Permanency Innovations Initiative (PII), funded by the Children's Bureau, Administration for Children and Families, is building the evidence base for innovative interventions that improve permanency outcomes for children and youth who are in or at risk for long-term foster care. Six grantees were funded during an initial planning year to select, design, or develop interventions and work with an evaluation contractor to develop site-specific evaluation plans for the subsequent four years. A major emphasis of the PII is the design of rigorous evaluations that will provide credible evidence and replicable interventions for achieving faster permanency for children and youth in foster care.

One grantee, the University of Kansas, will be ready to begin pretesting its data collection instruments and procedures in December 2011. ACF requests permission to conduct pretesting with the purpose of evaluating the family assessment measures and procedures; although existing standardized instruments will be used, the entire battery and procedures need to be tested for acceptability to respondents and sensitivity to change. The information collected will be used for internal purposes only and will not be released to the public; it will be used for adjusting the evaluation plan and instrumentation if needed based on pretest findings.

A.1. Circumstances Making the Collection of Information Necessary

Although the Adoption and Safe Families Act of 1997 included provisions focused on moving children and youth quickly into permanent families while maintaining their safety, many jurisdictions continue to experience growing populations of children who age out of foster care without achieving permanency. The PII grantees are implementing innovative interventions to address site-specific issues and help achieve timely permanency for more children and youth. A key component of the PII is the collection of data that will demonstrate linkages between interventions and outcomes.

A.2. Purpose and Use of the Information Collection

The University of Kansas is implementing an intervention that will provide services to children with Serious Emotional Disturbance (SED) who are in foster care and to their birth parents to prepare the families for reunification. The evaluation will follow a randomized design. The pretest will assess the procedures and instruments for collecting data on child, youth, and family functioning. Ultimately, after the pretest is complete, the data collected through the evaluation will provide information on the extent to which the intervention achieved its goal of improving parenting skills and enhancing readiness for permanency among the families who received the services.

The University of Kansas's pretest will include 60 families with children with SED who are in foster care; half will be randomly assigned to receive the intervention and the other half will receive services as usual. Trained data collectors will conduct assessments using a battery of instruments. The assessments include direct interviews with and observations of parents, as well as interviews with the families' caseworkers and review of their case files. The data from the

pretest will be used to understand the time required to administer the total battery, respondents' receptivity to the instruments, and the instruments' sensitivity to change, as well as any special challenges that arise during the administration.

A.3. Use of Improved Information Technology and Burden Reduction

To reduce burden on the families, University of Kansas plans to offer to administer the instruments in the families' homes and at times convenient to them.

A.4. Efforts to Identify Duplication and Use of Similar Information

The proposed instrument battery is not currently used in its entirety by all four private foster care agencies that will participate in the project. However, components of it are used in some of the agencies for certain families.

A.5. Impact on Small Businesses or Other Small Entities

No small businesses are impacted by the data collection in this project.

A.6. Consequences of Collecting the Information Less Frequently

Not applicable.

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

There are no special circumstances requiring deviation from these guidelines.

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

The first Federal Register notice for ACF's generic clearance for pretesting was published in the Federal Register, Volume 73, no. 39, p. 21957) on April 23, 2008.

The second Federal Register notice was published in the Federal Register, Volume 73, no. 137, p. 44271) on July 30, 2008.

A.9. Explanation of Any Payment or Gift to Respondents

Not applicable.

A.10. Assurance of Privacy Provided to Respondents

The University of Kansas has a full range of assurances for privacy, which were included in their submission to the University of Kansas IRB. These include:

- Respondents will receive a written informed consent form that will explain the evaluation process and assure them that their information will be private and securely stored.
- Strict policies and procedures for respondents' confidentiality will be followed by all project staff.
- All hard copies of documents will be secured behind two locks (e.g., locked file cabinet in locked room).
- All electronic content will be stored on secure servers. The server will be set with privileges that allow access only by specific individuals who have a username and password.
- All project data will be reported and presented at the aggregate level in order to prevent the identification of any individual respondent.

After the grantee receives IRB approval, it also will apply for a Certificate of Confidentiality from the National Institute for Health.

A.11. Justification for Sensitive Questions

The data collection battery does include sensitive questions. The information is required for monitoring changes in the families, eventually as part of the evaluation. For example, one question to the parent that might be considered sensitive is: In your home, how often does your child see bad behavior that you do not want him/her to copy? And another part of the battery includes a comprehensive assessment of multiple domains of family functioning. The assessments identify, gather, and weigh information from caseworkers and case files to understand the significant factors affecting a child's safety, permanency, and well-being; parental protective capacities; and the family's ability to assure the safety of their children. A number of items could involve sensitive information, including the status of parents' physical health, mental health, and disabilities; parental use of alcohol and/or drugs; disciplinary practices; intimate relationships with other adults who live in or come into the home; potential for physical or verbal violence in the home; anything that could affect a child's safety and well-being in this family; and family's income and employment status. Information gathered through the battery will be used in monitoring critical issues related to safely returning a child to his or her family.

A.12. Estimates of Annualized Burden Hours and Costs

Table A.1 contains the estimated burden hours for each type of respondent. To compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage for each adult participant, according to the Bureau of Labor Statistics, Current Employment Statistics Survey, 2011. The total annual burden for this pretest activity is expected to be 270 hours.

TABLE A.1
ESTIMATED ANNUAL RESPONSE BURDEN AND ANNUAL COST

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Family Assessment Battery	60	2.0	1.75	210.0	22.88	4,804.80
Caseworker interviews	60	2.0	0.5	60.0	22.88	1,372.80
Estimated Total	--	--	--	270.0		\$6,177.60

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

There are no direct monetary costs to respondents; they spend only their time to participate in the study.

A.14. Annualized Cost to Federal Government

The annualized cost to the federal government for the pretesting activities is \$31,789.86.

A.15. Explanations for Program Changes or Adjustments

This will be a new data collection effort in the Kansas regions, although part of the battery has been used in some of the regions for certain children and families. Pretesting is needed to assess the timing and flow of the battery of instruments and the acceptability to families, as well as to identify areas of importance for training of data collection staff.

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

There are no plans for tabulating and publishing the information gathered from this pretest process. The information that is collected will be for internal use only. The pretest will be conducted from December 2011 through August 2012.

A.17. Display of Expiration Date for OMB Approval

The OMB number and expiration date will be displayed on the parent consent form.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this data collection.