

THE SUPPORTING STATEMENT

Title: Regional Partnership Grant (RPG) Program
Data Collection

OMB No.: 0970-0353

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

On September 30, 2007, the Administration for Children and Families (ACF) Children's Bureau awarded multi-year grants to 53 regional partnerships grantees to improve the well-being, permanency and safety of children affected by methamphetamine or other substance abuse who have been removed or are at-risk of removal from their home. The Child and Family Services Improvement Act of 2006 (P.L. 109-288), the authorizing legislation establishing Targeted Grants to Increase the Well-Being Of, And to improve the Permanency Outcomes For, Children Affected by Methamphetamine Or Other Substance Abuse, referred to herein as the Regional Partnership Grantee Program (RPG), required that a set of performance indicators be established to periodically assess the grantees' outcomes. Section 4(b)(2)(A)(9)(B) requires the Secretary of the Department of Health and Human Services (DHHS) to submit annually a Report to Congress that includes the performance indicators established under this program. The legislation mandated that these performance indicators be developed through a consultative process involving ACF, the Substance Abuse and Mental Health Services Administration (SAMHSA), and representatives of the State or Tribal agencies who are members of the regional partnerships. Concurrent with the grant awards, the Children's Bureau awarded a support contract to the Center for Children and Family Futures to support a grantee performance management system. This scope of work includes defining the final set of performance indicators, developing an RPG data collection and reporting system, providing technical assistance to grantees, and providing an analysis of the data submitted on the performance indicators. With the assistance of the support contract, ACF is implementing this requirement by creating a collection of information entitled the Regional Partnership Grant Data System.

The final set of RPG performance indicators was approved by ACF and disseminated to the funded grantees in January 2008 for their comment and input. It includes 23 indicators across four outcome domains: child/youth (9 indicators), adult (7 indicators), family/relationship (5 indicators), and regional partnership/service capacity (2 indicators). These domains include child welfare system and substance abuse treatment system indicators. It also includes a

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

The purpose of this request is to obtain Office of Management and Budget(OMB) approval for an extension of the original three year request that was approved on March 31, 2009. OMB approval is required to continue collection of the legislatively required performance and outcome data for the fifth year of the grant period and for up to one additional year to accommodate grantee extensions, should they be granted. Data collection will be concluded no later than January 2014.

2. Purpose and Use of the Information Collection

The first submission of RPG grantee data was uploaded to the RPG Data System in December, 2008. Grantees have been uploading their data twice annually, in June and December. The data are used to meet the statutory requirement for the Secretary of the Department Health and Human Services (DHHS) to submit annually a Report to Congress that includes the services provided and activities conducted with these funds, performance indicators established under this grant program, and the progress that has been made in addressing the needs of families with substance use disorders who come to the attention of the child welfare system. The first Report to Congress was submitted by DHHS in June 2010. The second Report to Congress is currently under review. Two additional Reports to Congress will be submitted to reflect the final two years of the grant program.

The data are also used to monitor grantee performance with respect to their selected performance indicators. Data analysis reports from these data have been provided by the contractor to the Children's Bureau in April 2010 and 2011. They will be provided annually for the remainder of the grant period.

3. Use of Improved Information Technology and Burden Reduction

To minimize grantee data collection and reporting burden, many of the data elements are already being collected by counties and states in order to report Federally-mandated data to the Adoption and Foster Care Analysis and Reporting System (AFCARS), the Treatment Episode Data Set (TEDS) and the National Outcome Measures (NOMs). In addition, all States voluntarily submit data for the Federal National Child Abuse and Neglect Data System (NCANDS). Therefore, most child welfare data elements included in the RPG performance measures are found in a State's automated case management system, which is often a Federally-funded Statewide Automated Child Welfare Information System (SACWIS). If a State elects to implement a SACWIS, the system is expected to be a comprehensive automated case management tool that meets the needs of all staff involved in foster care and adoption case management. A SACWIS is required to support reporting of data to AFCARS semi-annually and annually to NCANDS. AFCARS reports information on all children in foster care, while NCANDS reports information on State child maltreatment reports. TEDS admission and discharge data are collected by State substance abuse agencies according to their own information systems for monitoring substance abuse treatment admissions and transmitted monthly or quarterly to the SAMHSA contractor. Data for the 23 performance indicators have been collected by grantees via (a) extraction from established State data systems (e.g., SACWIS, and State or local substance abuse information systems) and (b) new data collection.

The RPGs submit data to the RPG Data System in an electronic format. The contractor has developed an individualized data plan with each grantee that supports the submission of performance data using Extensible Markup Language (XML), consistent with the E-Government Act of 2002 (Public Law 107-347). The data plan instructs the RPG Data System on which indicators and data elements each grantee is submitting. A data plan sample is a part of the request package.

4. Efforts to Identify Duplication and Use of Similar Information

The Department has analyzed the sources and reporting instruments already in use by ACF and SAMHSA and concluded there is no single automated system that collects the information required for the Report to Congress. As a result

of prior Federal government reporting requirements as described in number three above, RPGs have been able to use existing data for seven performance indicators.

The RPGs have been coordinating with State or county data/information systems administrators to download information from these existing State child welfare and substance abuse treatment data systems to obtain data on the RPG children and families served (and comparison groups, if applicable). This reduces the amount of primary data collection needed and eliminates any possibility of duplication at the grantee level. Since there are no existing reporting systems that collect the data required by this grant program, this data collection plan does not duplicate any current efforts.

5. Impact on Small Businesses or Other Small Entities

The proposed information collection has not impacted small businesses and the information being collected is the absolute minimum required for the intended use.

6. Consequences of Collecting the Information Less Frequently

This collection of data on performance indicators is mandated by law; therefore, the Department would be out of compliance with the statutory requirements if performance indicator data were not collected from the grantees. The Department would lack the data necessary to submit congressionally mandated reports to Congress.

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

There are no special circumstances for this data collection.

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

The 60 day notice was published on July 6, 2011. No comments were received as a result of that notice. The agency's contractor consulted with three evaluation staff responsible for submitting data during the prior collection period.

9. Explanation of Any Payment or Gift to Respondents

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

10. Assurance of Confidentiality Provided to Respondents

All grantees have had their evaluation and data collection protocols reviewed by their local or State Institutional Review Boards (IRB). Depending on the IRB, grantees have either been required to submit full IRB applications or have been granted IRB exemptions. The IRB exemptions have resulted from the perspective that the grant programs are not conducting research. When exemptions are not granted and IRB approval has been obtained, the grantees are following the HHS Protection of Human Subjects regulations (45 CFR Part 46) including providing participants with full disclosure of the study methods and purpose, the voluntary nature of their participation, and their right to withdraw from the study without prejudice. In addition, all grantees are taking precautions to protect the privacy and confidentiality of their data through measures such as password protected files.

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

11. Justification for Sensitive Questions

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

12. Estimates of Annualized Burden Hours and Costs

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

INFORMATION COLLECTION	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
Private Sector	17	2	175.5	5,967
State, local, or Tribal Government	26	2	175.5	9,126

Estimated Total Annual Burden Hours: 15,093

The annualized cost of the response burden is the product of the average hourly wage (unburdened) for RPG staff times the total burden estimate: \$41/hour x 15,093 hours = \$618,813.00. This average hourly wage was derived from wage information

collected from a sample of funded grantees.

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

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

Total Capital and Start-up	\$3426 x 43 = \$147,318.00
Total operation, maintenance and purchase of services	

14. Annualized Cost to the Federal Government

Annualized Cost to Respondents (12)	618,813.00
Annual cost burden to respondents or record keepers (13)	147,318.00
Annualized cost to Federal Government (14)	184,052.00
Total Average Annual Cost	950,183.00

15. Explanation for Program Changes or Adjustments

There are no program changes.

The only adjustment reported in Items 13 and 14 reflects the reduction from 53 to 43 in the number of grantees (respondents) who will submit data on their grants, due to the expiration of the grant period for 10 grantees. Therefore, the annual response burden will be reduced from 106 responses to 86 responses.

16. Plans for Tabulation and Publication and Project Time Schedule

The Secretary of the Department of Health and Human Services is required to submit annually a Report to Congress that includes the performance data indicators. Reports include aggregated demographic information and frequency tabulations of persons served by grantees, and the computation of performance indicators based on data submitted by grantees. Statistical analyses of the relationship between program services and performance indicators will be conducted by the contractor in the fifth and sixth year of the program. Additional analysis and reporting of RPG services, activities, and performance will be conducted in the sixth year of the support contract. The schedule for the final data submission by grantees is no later than January 2013, to reflect grant activity through September 2012, the final year of the grant period. Data collection may be extended for one year until January 2014 should grantees request and be granted no-cost extensions.

The Administration for Children and Families (ACF) will ensure that all disseminated information will be prepared in accordance with professional and ethical standards. They will be appropriate for dissemination by ACF and will undergo appropriate review and approval prior to release. ACF adheres to the laws and regulations applying to publications, including OMB Information Quality Guidelines, the HHS Printing Handbook, and relevant ACF policy issuances. ACF efforts to ensure and maximize information quality begin at the preparation stage and continue through the review and approval stages. When published electronically, existing ACF policies developed in concert with Federal computer security laws will provide appropriate security safeguards to ensure integrity of ACF documents, i.e., that the information is protected from unauthorized access, revisions, corruption, or falsification. Each publication will be accurate, both in specific details and in general impressions, and meet accepted standards of high quality. ACF documents and presentations containing text and summary data will be objective and scientifically sound. Sources will be referenced for the convenience and further

information of the reader. Supporting data will have full, accurate, and transparent documentation.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.

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

1. Respondent Universe and Sampling Methods

The respondent universe for this extended data collection is the remaining 43 RPG grantees. The grant periods for 10 grantees will have ended prior to this data collection time frame. Grantees are required to submit performance data as a condition of their grant award. All grantees are submitting data; no sampling methods are being employed. One hundred percent of grantees (N=53) reported data during the previous collection period. The expected response rate for this data collection is 100 percent.

2. Procedures for the Collection of Information

This project has not employed any statistical methodology for stratification and sample selection, nor has it used estimation procedures.

The RPG grantees are required to participate in the collection of these data elements as a stipulation of receiving funding from ACF. All RPG grantees are required to obtain approval from Institutional Review Boards prior reporting of the data elements. Informed consent is necessary to for using the

client's personal data as part of the evaluation/monitoring of the RPG program.

3. Methods to Maximize Response Rates and Deal with Nonresponse

Each grantee is assigned a Performance Management Liaison (PML) through the support contract with ACF, who provides technical assistance on evaluation and programmatic issues. On-site visits of every grantee were conducted during the first data collection period. PMLs have been conducting regular calls with grantees, and provided technical assistance on their data collection efforts. PMLs also follow up with sites after their data submission. Automated data edits have been implemented to improve data validity during the data upload process.

4. Test of Procedures or Methods to be Undertaken

There will not be any tests of procedures or methods during this collection period. As noted above, the majority of the data performance indicators currently exist in Federal child welfare and substance abuse treatment data sets to which grantees are reporting as part of their normal operations.

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

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