

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 on Children, Youth and Families in the Administration for Children and Families of the U.S. Department of Health and Human Services collects national child abuse and neglect statistics through the National Child Abuse and Neglect Data System (NCANDS). NCANDS was established in response to the 1988 amendment (P.L. 100–294) to the Child Abuse Prevention and Treatment Act (CAPTA) (42 U.S.C. 5101 et seq.), which called for the creation of a coordinated national data collection and analysis program, both universal and case specific in scope, to examine standardized data on false, unfounded, or unsubstantiated reports.

The 1996 CAPTA amendment (42 U.S.C. 5106a(d)) required all States that receive Basic State Grant funds to provide specific data elements, to the extent practicable, to the Federal Government. These data items were incorporated into NCANDS. Since that time, other CAPTA revisions that pertain to child welfare have been included in NCANDS. This application is related to the most recent reauthorization of CAPTA during 2010 (P.L. 113–320) (see Attachment A, CAPTA Excerpt or the Children's Bureau website at http://www.acf.hhs.gov/programs/cb/laws_policies/).

This Supporting Statement proposes to continue to collect NCANDS data using two files of the Detailed Case Data Component (DCDC): (1) Child File, the case-level component of NCANDS and (2) Agency File, the aggregate data component. The Children's Bureau is not proposing to continue to collect NCANDS data via the Summary Data Component (SDC), as States will no longer be using this file to submit data.

The Children's Bureau is seeking reapproval of these instruments with modifications. Modifications are being proposed to meet requirements of the amendments in the CAPTA Reauthorization Act of 2010 (P.L.111–320) passed on December 20, 2010 and to clarify existing reporting. The proposed modifications are discussed below. The current approval of the DCDC expires on November 30, 2012.

Modifications to the Child File

The Children's Bureau proposes to modify the Child File as follows:

- **Field 147, Report Time:** The Report Time field will collect the exact time (hour and minute) that a report was received by the hotline or other intake unit. CAPTA requires that each State submits the time from the report of abuse or neglect to the start of the initial child protective services (CPS) agency's response (42 U.S.C. 5106a (d)(8)). Currently, NCANDS only collects the date a report was received. Adding the

time field will improve reporting for the Child and Family Services reviews and the GPRA Modernization Act of 2010 (P.L. 111–352).

- **Field 148, Investigation Start Time:** The Investigation Start Time field will collect the exact time (hour and minute) that the CPS agency’s response was initiated. CAPTA requires that each State report the time from the report of abuse or neglect to the start of the CPS agency response (42 U.S.C. 5106a (d)(8)). Currently, NCANDS collects the CPS response start date. Adding the time field will enable a more accurate computation of the time between receipt of the report and the start of the CPS response. This addition will improve reporting for the Child and Family Services Reviews and GPRA.
- **Field 149, Maltreatment Death Date:** The Maltreatment Death Date field will collect the exact date (day, month, and year) that a child died due to child abuse or neglect. CAPTA requires that each State report the number of deaths in the State during the year resulting from child abuse or neglect (42 U.S.C. 5106a (d)(5)). Currently, NCANDS collects that the child was determined to have died due to maltreatment, but does not collect the date of death. Because determinations of the cause of death can take several months, adding the date of death will ensure a more accurate reporting of child fatality data.
- **Field 150, Foster Care Discharge Date:** The Foster Care Discharge Date field will collect the exact date (day, month, and year) that a child exits from foster care. This field will be completed for those children who were removed from their homes and have entries in the removal date and foster care services fields. Currently, NCANDS collects the exact date (day, month, and year) that a child entered foster care, but not the exact date (day, month, and year) when the child exited foster care. This addition will improve reporting for the Child and Family Services Reviews.

Modifications to the Agency File

The reauthorization of CAPTA asks for the number of children who are eligible for referral and the number of children referred to Part C agencies (42 U.S.C. 5106a (d)(16)). The Children’s Bureau proposes to modify the Agency File by adding two new fields to meet these requirements:

- **Field 5.1, Number of Children Eligible for Referral to Agencies Providing Early Intervention Services Under Part C of the Individuals With Disabilities Education Act:** This field will collect the number of children who were the subject of a CPS response, received a disposition, and were considered by the State to be eligible for referral to Part C agencies during the reporting period.
- **Field 5.2, Number of Children Referred to Agencies Providing Early Intervention Services Under Part C of the Individuals With Disabilities Education Act:** This field will collect the number of children who were considered eligible and actually were referred to Part C agencies during the reporting period.

2. Purpose and Use of the Information Collection

A major product of NCANDS is the annual *Child Maltreatment* report (see http://www.acf.hhs.gov/programs/cb/stats_research/index.htm#can). These national reports have been published annually for 21 years and are the primary source of information about children who were known to child protective services agencies. The NCANDS data also are a critical source of information for many publications, reports, and activities of the Federal

Government, child welfare personnel, members of Congress, and researchers. Some examples of programs and reports that use these data are provided below.

- The Children's Bureau uses NCANDS data in the annual report *Child Welfare Outcomes: Report to Congress* to provide information regarding States' performance on national child welfare outcomes as per the Adoption and Safe Families Act of 1997 (P.L. 105–89). The most recent report is the *Child Welfare Outcomes 2006–2009* (available at http://www.acf.hhs.gov/programs/cb/stats_research/index.htm#cw).
- NCANDS data were incorporated into the Child and Family Services Reviews, which ensures conformity with State Plan requirements in titles IV–B, and IV–E of the Social Security Act. NCANDS data are the basis for two of the national data indicators. Data also are used by the States when developing their Performance Improvement Plans and by the Children's Bureau in monitoring States' performance (see <http://www.acf.hhs.gov/programs/cb/cwmonitoring/index.htm#cfsr>).
- Another use of NCANDS data is to assess States' performance in the Community-Based Child Abuse Prevention Grants program. The program performance assessment is targeted to the prevention efforts designed to reduce the rates of first-time victims of maltreatment and of adults who are first-time perpetrators of child abuse and neglect. The measure is based on analyses conducted using Child File data (see <http://friendsnrc.org/cbcap>).

According to site administrators, the annual *Child Maltreatment* reports are the most downloaded documents on the Children's Bureau website. A version of the report was downloaded an average of 640,000 times each month during 2011. NCANDS data also have been cited in articles in such academic journals as *Pediatrics*, *Child Abuse and Neglect*, *Children and Youth Services Review*, and *Journal of Adolescent Health* and in publications by such organizations and agencies as the Federal Interagency Forum on Child and Family Statistics, Child Trends, and the Centers for Disease Control.

3. Use of Improved Information Technology and Burden Reduction

The NCANDS supports the use of electronic submission as a method to reduce the burden on the States. States also are provided with a runtime version of a validation program to enable them to validate their data prior to submission.

The Child File records are transmitted electronically in the American Standard Code for Information Interchange (ASCII) format. Each record contains standardized data pertaining to a child who has received a CPS response 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 after passing through quality control programs. 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, thus minimizing or reducing reporting burden.

The Agency File data are submitted to NCANDS via the same secure portal. Agency data are aggregated data submitted via tabbed data entry screens designed similarly to a questionnaire. Helpful instructions are provided for each question or data item. Data can be saved in multiple sessions and submitted when all data are collected. For archival purposes, a State may download the data in MS Word format. The NCANDS Portal also provides the feature to compare submissions to previous years and—again for archival purposes—the comparison template may 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 may track the status of its data submission from the time data are first saved until the data are accepted.

4. Efforts to Identify Duplication and Use of Similar Information

The NCANDS data collection effort is 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. Other studies, with the approval of the Children’s Bureau and the States, have incorporated already submitted NCANDS data in their research to avoid duplication in their studies.

For example, 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 most recent wave of data collection received copies of the Child Files, which States already had submitted to NCANDS, to supplement the NSCAW survey data. Therefore, State burden to participate in NSCAW was reduced.

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.

NCANDS and AFCARS are distinct in term of the populations that they address, but there is some overlap. In support of the goal of integration, the data collection period for NCANDS was changed in 2003 from calendar year to Federal fiscal year, the same as AFCARS. The AFCARS ID field also was added to NCANDS as a means of linking the two data sets in the future, as per the CAPTA requirement mentioned above.

One area of overlap between AFCARS and NCANDS pertains to a child’s removal from the home. The NCANDS requests information as to whether a child was removed as an immediate consequence of a report related to abuse or neglect. This request is in conformity with the 1996 amendments to CAPTA. The removal data collected through NCANDS are likely to be a subset of the more detailed placement data required by AFCARS. The collection of removal data 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.

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 to acquire national data (42 U.S.C. 5106a(d)).

6. Consequences of Collecting the Information Less Frequently

Annual data collection is the minimal frequency that permits 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: Report to Congress* mandated by section 203 of the Adoption and Safe Families Act, depend upon NCANDS data. Furthermore, CAPTA requires an annual report of the listed data (42 U.S.C. 5106a(d)). 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 January 31. States have approximately 120 days from the completion of the Federal fiscal year to submit data.
- *Requiring Respondents to Submit More than One Original and Two Copies.* States are required to submit only one electronic Child File and one Agency File to NCANDS.
- *Requiring Respondents to Maintain Records for More than 3 Years.* Only data for a given data collection year are required. Because States extract data submissions 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 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 at Cornell University, 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

The Children’s Bureau engaged States and other interested parties in discussing improvements to the NCANDS through many venues. The proposed modifications to the Child File and Agency File are the result of discussions with NCANDS State contact persons via webinars, working groups, and the November 2011 NCANDS annual national meeting.. During this meeting, the proposed modifications were discussed in detail. Furthermore, all States reviewed documents that discussed various changes and many NCANDS State contact persons participated in various working groups that discussed the merits of possible changes.

A Federal Register announcement soliciting comments on renewing approval for the collection of NCANDS data was published on March 5, 2012, (Volume 77, Number 43, pp. 13129–13131). All States were informed of the announcement and provided with instructions for submitting comments. Seven States provided comments about the proposed modifications.

With the exception of a proposal to include a field indicating a child maltreatment resulted in a near fatality, only one State said it could not implement the proposed modifications. Due to the concerns expressed by States of the ability to capture and report consistent near fatality data to NCANDS, the Children’s Bureau decided not to add the data field. This change is reflected in proposed modifications to the Child File, as the Near Fatality field is no longer listed (see section A. Justification, 1. Circumstances Making the Collection of Information Necessary, Modifications to the Child File).

Some States expressed additional concerns related to the time needed for implementing changes and training staff about the new fields. The Children’s Bureau will address these concerns by releasing the new record layouts and instructions for the Child File and the Agency File in January 2013. However, States would not be expected to report data using the new record layouts until January 2014 and the Children’s Bureau would not expect full implementation until January 2015. In addition, the proposed modifications will be discussed during the NCANDS annual meetings and technical assistance will be made available to all States upon request.

NCANDS is a voluntary data collection system and there are no penalties or fines associated with not reporting. If a State were not able to report data in one or more of the proposed fields, the State would leave the field blank.

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 States in support of 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 |
|--|-----------------------|------------------------------------|-----------------------------------|--------------------|
| Detailed Case Data Component: (Child File and Agency File) | 52 | 1 | 112.3 | 5,841 |
| Estimated Total Annual Burden Hours: | | | | 5,841 |

These estimates are based on the experience of States, who have provided data in the past, and their estimates for implementing the modifications. It is premised on the expectation that 52 States will submit the Child File and the Agency File. While the estimates for the Agency File 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. The estimates are based upon those States that invest considerable attention to submitting a comprehensive file.

The annual burden is based upon an average hourly salary of \$44.00 for State programmatic staff and \$66.00 for State information technology (IT) staff. Across all respondents, for the Child File, the programmatic staff burden is estimated at 763 hours (or 15 hours per respondent) at \$44.00 per hour for a total of \$33,557; the IT staff burden is estimated at 1,751 hours (or 34 hours per respondent) at \$66 per hour for a total of \$115,544. Across all respondents, for the Agency File, the programmatic staff burden is estimated at 2,141 hours (or 41 hours per respondent) at \$44.00 per hour for a total of \$94,189; the IT staff burden is estimated at 1,187 hours (or 23 hours per respondent) at \$66.00 per hour for a total of \$78,364. These totals result in an estimated annual cost of \$321,655.

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 collection 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.

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 | \$ 180,000 | \$ 185,000 | \$ 190,000 | \$ 185,000 |
| Contractor Staff | \$1,585,700 | \$1,631,900 | \$1,678,100 | \$1,631,900 |
| Total | \$1,765,700 | \$1,816,900 | \$1,868,100 | \$1,816,900 |

The above costs are based upon the use of contractor staff to collect, validate, process, and analyze the Child File and Agency File data, as well as provide briefings and prepare the annual *Child Maltreatment* report. Contractor staff provide technical assistance during validation of the files to correct any errors and hold one annual national meeting of all States with the objective of improving the data quality. In addition, contractor staff provide support to such other Federal data reporting initiatives as the Child and Family Services Reviews and the *Child Welfare Outcomes: Report to Congress*. Federal staff direct and monitor all efforts.

15. Explanation for Program Changes or Adjustments

The annual burden estimate for 2009–2012 was 5,264 hours. The annual burden estimate for 2013–2015 is 5,841 hours. This increase adjustments is due to the addition of the new fields to the Child File and the Agency File and increased hourly rates.

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

The highlights of the annual data collection schedule are as follows:

- September 30–Federal fiscal year closes
- December 1–Data request letter sent to all States
- January 31–Data submissions due from all States
- March 31–Data validation cycle completed, including any data resubmissions
- December 15–annual *Child Maltreatment* 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

The Children's Bureau discussed the proposed modifications with NCANDS State contact persons, Federal staff, and others during meetings, conferences, webinars, and working groups since CAPTA was reauthorized during December 2010. These discussions results in the request for the modifications included in this application.

Nine NCANDS State contact persons volunteered on behalf of their State to pilot the proposed modifications to the NCANDS Child File and Agency File. These States then provided burden estimates for implementing the changes. The NCANDS State contact persons from the following States volunteered to pilot and provide burden estimates: Alaska, Connecticut, Florida, Illinois, Louisiana, Massachusetts, Minnesota, Nebraska, and Oklahoma.

5. Contact Individuals

The person in the Children's Bureau responsible for NCANDS is:

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