Permanency Innovations Initiative: Phase 2

OMB Information Collection Request

0970 - 0408

Supporting Statement

Part A

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Submitted By:

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**A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for data collection as part of the Permanency Innovations Initiative (PII) Evaluation. PII is a 5-year initiative funded by the Children’s Bureau (CB) within the Administration for Children and Families (ACF). The overall goal of PII is to build the evidence base for innovative interventions that enhance the well-being and improve permanency outcomes for children and youth who are at the highest risk for long-term foster care and who experience the most serious barriers to permanency. ACF’s Office of Planning, Research and Evaluation is overseeing the evaluation component of the PII.

The proposed PII Evaluation includes multiple components:

* Cross-site implementation study;
* Site-specific impact evaluations;
* Cross-site administrative data study; and
* Cost study.

OMB approved information collection activities for the cross-site implementation study and two of six site-specific impact evaluations. This current request is for activities related to two additional site-specific impact evaluations. ACF will submit an additional request in the future to cover remaining information collection activities.

#### *Study Background*

The Adoption and Safe Families Act of 1997 included provisions focused on moving children and youth quickly into permanent families while maintaining their safety. However, many jurisdictions continue to experience growing populations of children who age out of foster care without achieving permanency. Consequently, the CB released a grant announcement for a Permanency Innovations Initiative (HHS-2010-ACF-ACYF-CT-0022, CFDA No. 93.648) to “...fund demonstration projects that support the implementation and test the effectiveness of innovative intervention strategies to improve permanency outcomes of subgroups of children that have the most serious barriers to permanency....” Six grantees were funded under this initiative.

The PII grantees are developing and implementing innovative interventions to address site-specific barriers in order to achieve timely permanency for more children and youth. Overall, PII was designed and structured to address the scarcity of evidence-based programs and practices in the field of child welfare. Despite knowledge about the numerous barriers to permanency, the effectiveness of programs and strategies for achieving permanency has not been established. Using a mix of research methods, the various evaluation components will inform the federal government about the effectiveness of the PII interventions and provide information to help other child welfare agencies develop, implement, and strengthen interventions in the future.

#### *Legal or Administrative Requirements that Necessitate the Collection*

The legislative authority is Section 426 of the Social Security Act (42 U.S.C. Section 626). The PII grantees are required to engage in rigorous site-specific evaluations that will help improve services and demonstrate linkages between their interventions and outcomes. They are also required to participate in a cross-site evaluation of the initiative.

**A2. Purpose of Survey and Data Collection Procedures**

***Overview of Purpose and Approach***

PII grantees have been funded to identify local barriers to permanent placement and to develop and implement innovative strategies that mitigate or eliminate those barriers and reduce the likelihood that children will linger in foster care. The proposed PII Evaluation includes multiple components:

* Cross-site implementation study;
* Site-specific impact evaluations;
* Cross-site administrative data study; and
* Cost study.

**Cross-site implementation study**. The implementation study will document the status of grantees’ implementation of their planned interventions and address questions related to whether implementation status mediates or moderates the achievement of proximal outcomes and/or a reduction in long-term foster care, and whether grantees’ implementation capacity improves over the course of the grant period. A package for this study was approved in August 2012 by OMB (OMB #0970-0408).

**Site-specific impact evaluations.** Grantees have been funded to implement different interventions with different target populations. Due to the diversity in each site’s sample, as well as across interventions being implemented, each study has unique research questions and data collection tools. Interventions are also being implemented and evaluated on different timelines. Therefore, multiple OMB packages are being submitted to obtain approval for individual sites’ data collection tools.

OMB approved data collection instruments for two site-specific impact evaluations (Washoe County, Nevada and State of Kansas) in August 2012 (OMB #0970-0408). The current package is seeking approval for data collection related to site-specific impact evaluations in two additional sites:

* Illinois Department of Children and Family Services (DCFS), and
* One component of the Los Angeles Gay and Lesbian Center’s RISE project (see below for additional information on each of these sites).

A future information collection request will include data collection for remaining components of the RISE intervention as well as remaining PII sites.

**Cross-site administrative data study.** State administrative data will serve as the key source of common information on the long-term outcomes of importance to PII (e.g., permanency-related outcomes). These data will be used to determine whether or not interventions help improve permanency-related outcomes for youth in PII treatment groups as compared to youth in the control conditions. The administrative data study does not require new instruments for measurement and will make use of data currently reported by States under separate OMB clearances for the Adoption and Foster Care Analysis and Reporting System (AFCARS) (OMB Control # 0980-0267) and the National Child Abuse and Neglect Data System (NCANDS) (OMB Control # 0980-0229), as well as data maintained in State Automated Child Welfare Information Systems (SACWIS). A future information collection request will include any burden associated with preparing or delivering administrative data to the PII evaluators.

**Cost study.** The cost study will involve grantee submission of common programmatic cost data, using a spreadsheet to disaggregate, record, and automatically tally program expenditures. Grantees will be asked to submit spreadsheets semi-annually. The first categorization of program costs will correspond roughly to budget line items, including personnel, space, utilities, travel, and supplies. The second will comprise the components of personnel (labor) costs, typically represent the largest proportion. For these components, we will distinguish various types of program staff activities, such as direct client services and administrative activities.

ACF will submit a future information collection request for these activities.

This information collection request is the second of three total information collection clearance packages ACF plans to submit to cover different phases and components of the PII project.

***Research Questions***

The overarching research question for the Permanency Innovations Initiative is whether various interventions can improve permanency outcomes (e.g., increase rates of permanency, or decrease time to permanency) for children in the foster-care system. However, there is considerable variability across the PII grantees, both in terms of their specific target populations and the interventions being implemented. Thus, each site has a unique research question and set of proximal outcomes hypothesized to lead to the common permanency outcome(s). Data collection instruments for each site-specific evaluation are therefore tailored to the research questions and proximal outcomes being measured (see below for more details).

Illinois Department of Children and Family Services (DCFS)

The DCFS evaluation will examine the impact of the Illinois PII intervention, known as TARGET, an intervention designed to address problems resulting from exposure to trauma. The main research question for the DCFS evaluation is: Do foster youth (ages 11-16) who, upon reaching the 2-year anniversary of entering care are experiencing mental health symptoms and/or have had at least one placement change, experience increased permanency rates if they receive the TARGET intervention compared with similar youth who receive services as usual? The evaluation will examine the impact of the intervention on a set of proximal outcomes as well: youth placement instability, youth trauma-related and mental health symptoms, biological parents’ skills in regulating their emotions, and foster parent skills in understanding and addressing the needs and disruptive behaviors of the children in their care with trauma histories. It is hypothesized that improvements in the identified proximal outcomes will lead to treatment group youth achieving permanency more quickly and at greater frequency than youth who do not receive the intervention.

Los Angeles Gay and Lesbian Center RISE

The Los Angeles Gay and Lesbian Center is implementing an intervention that will address barriers to permanency and well-being for lesbian, gay, bisexual, transgender, and questioning (LGBTQ) and gender-variant children and youth, ages 7-16, who are in foster care. RISE comprises two components: (1) outreach and relationship building (ORB) aimed at creating LGBTQ competency and supportive strategies in Los Angeles Department of Children and Family Services (DCFS) offices and private foster care agencies; and (2) care coordination teams (CCTs) to provide wraparound services addressing the particular permanency needs of LGBTQ and gender-nonconforming children and youth and their families. The ORB component, subject of the information collection request in this package, includes staff training to enhance the cultural competence of the DCFS office or private agency. For caseworkers who have received RISE ORB training, proximal outcomes include the impact of training on their competence in addressing issues of sexual orientation and gender nonconformity. An information request for instruments associated with evaluation of the CCT component will be submitted at a later date. Ultimately, data collected through the full evaluation will provide information on the extent to which the RISE achieved its goal of faster permanency for LGBTQ and gender-nonconforming children and youth.

***Study Design***

DCFS

The sample for the DCFS evaluation includes 684 youth. The youth must fit the following criteria:

* Be between the ages of 11-16;
* Be placed in traditional, relative, and specialized foster homes throughout the state of Illinois;
* Be experiencing mental health symptoms and/or have had at least one placement change upon reaching the 2-year anniversary of placement in foster care.

On a rolling basis, DCFS will project cases that will soon meet the established eligibility criteria based on age and time in foster care. DCFS will confirm the youth’s eligibility by examining administrative data on the youth’s current mental health and trauma-related symptoms and previous placement changes. DCFS will then consult the caseworker to verify the appropriateness of the youth to participate in the study and will obtain consent from the DCFS Guardian, who has legal authority over all children in foster care in Illinois, for each individual youth to participate in the intervention and the data collection. Biological parents eligible to participate in the study include those: (1) who are the parent of a program-eligible youth and (2) for whom DCFS is still pursuing reunification of the youth and parent. DCFS will make the determination as to the viability of reunification between the youth and the parent. In the rare event that it is not the biological parent but a legal guardian or an adoptive parent who DCFS is seeking to reunify with a study youth, this parent will be eligible to participate in the intervention and data collection. Foster parents are eligible to participate in the study if they are the current caregiver of a program-eligible youth.

DCFS will use a computer program to randomly assign youth to treatment or services-as-usual groups, half in each group. DCFS will assign the foster and biological parents to a condition based on the youth’s assignment. If the youth is assigned to the treatment group, they will receive the 4-month TARGET intervention. Youth in the control group will receive services as usual.

All youth and foster and biological parents will be asked to assent/consent to data collection. Participants (youth, foster parent, and biological parent) will be asked to complete two interviews: one at the start of their enrollment in the study and a second one 6 months later. The interviews include questions that examine the youth’s ability to regulate their emotions and behaviors from their perspective as well as from the foster parent’s perspective, parenting skills of the foster parent in responding to youth’s emotions and behaviors, the biological parent’s ability to regulate their emotions and behaviors, youth’s trauma-related and mental health symptoms, youth’s capacity to form and maintain relationships, and the quality of the youth’s, biological parent’s, and foster parent’s support system. Trained data collectors will conduct interviews using a battery of instruments.

RISE

The evaluation of the RISE ORB component will follow a randomized design. Sixteen DCFS offices and approximately 60 private foster care agencies that will participate in 8-hour RISE caseworker training will be randomly ordered to receive the training. Then, from the resulting schedule of training sessions for these offices and agencies (with approximately 4700 staff to be trained), the study team will randomly select 10% of the staff participating in training (N=470) to receive a pretest and posttest to assess gains in LGBTQ competency. Trained data collectors will administer the pretest immediately before the training, and the posttest will be self-administered 1 month after RISE caseworker training is complete. Random ordering of offices to receive the caseworker training ensures the most diverse sample possible for the target population of trainees. Random selection for caseworker data collection reduces overall burden by using a representative sample rather than surveying the entire population of trained staff, while increasing generalizability.

***Universe of Data Collection Efforts:***

***Previously Approved Data Collection Instruments***

OMB approval for data collection for the Kansas and Washoe grantee impact studies and the cross-site implementation study has already been received. See Attachment A1 for the Research Matrix for Implementation, Kansas, and Washoe Studies, showing a summary of their research designs, instruments, burden hours, and research questions.

***Current Request for Data Collection Instruments***

DCFS

The data collection activities for the DCFS evaluation include interviews with youth and their foster and biological parents.

Biological parents will be interviewed over the telephone (see Attachment C4, DCFS Biological Parent Interview). This interview is designed to assess emotion regulation, parenting practices, and skills. Information obtained from the biological parent interview will be used to assess for proximal outcomes of interest for the DCFS site.

A data collector will conduct in-person interviews with foster parents (see Attachment C7, DCFS Foster Parent Interview). This interview includes questions related to emotion regulation, social skills, and parenting practices. The information will be used to assess the proximal outcomes of interest for the DCFS site. The foster parent interviews will be conducted using Computer-Assisted Self-Interview (CASI) methodology (See Attachment C10, DCFS CASI Measures and Instructions Screens).

A data collector will conduct in-person interviews with youth (see Attachment C9, DCFS Youth Interview). This interview includes information related to social support, emotion regulation, trauma, and emotional permanency. The child’s interview contains information needed to assess proximal outcomes of interest for the DCFS site. The youth interviews will be conducted using Audio-CASI (See Attachment C10, DCFS ACASI Measures and Instructions Screens).

See Attachment C1 for the DCFS Research Matrix, a crosswalk of DCFS research design, instruments, burden hours, and research questions.

RISE

The data collection activities for this component of the RISE evaluation includes administration of a pre- and post-test with foster care staff enrolled in ORB training. Staff who have been randomly selected to participate in the study will complete the RISE Staff Pre-Test (see Attachment D3). A month after completing the training, staff will be sent a packet containing the RISE Staff Post-Test to complete (see Attachment D5).

See Attachment D1 for the RISE Research Matrix, a crosswalk of RISE research design, instruments, burden hours, and research questions.

***Future Information Collection Requests***

Data collection for the cross-site cost study is planned for fiscal year 2014. An OMB information collection request will be developed for that study after clearance is received for the present request. That information collection request will also include burden associated with submission of state-level data for the administrative data study. Additionally, the RISE project is planning on adding data collection to evaluate proximal outcomes for the CCT intervention component, and data collection for the California Partnership for Permanency (CAPP) site (which was included in the 60-day notice for the present request) will also be included in the next OMB submission.

**A3. Improved Information Technology to Reduce Burden**

To reduce burden on the biological parents for the DCFS evaluation, the study team plans to administer the instruments by telephone at times convenient to them. In addition, the DCFS foster parent interviews will be conducted via Computer-Assisted Self-Interview (CASI) methodology, and the DCFS youth interviews will be conducted via Audio-CASI (ACASI) to make the interviews easier and more efficient. A Westat data collector will set up the CASI and ACASI and be available to assist the parent and youth as needed throughout the interview sessions.

**A4. Efforts to Identify Duplication**

None of the proposed instruments are currently being used on the target populations in the child welfare systems. In order to streamline the data collection process and reduce duplicative efforts, we reviewed all measures to confirm that no questions are repeated and the instruments are not redundant. Many of the measures are standardized and are being used in accordance with manuals, but when possible and appropriate for our research purposes we selected brief or shortened versions of the measures. Additionally we reviewed all measures to ensure that they measured discrete concepts of interest for this research study. No two measures target the exact same concept. In addition, we will be using extant administrative data to measure distal outcomes such as achievement of permanency.

**A5. Involvement of Small Organizations**

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

**A6. Consequences of Less Frequent Data Collection**

The data collection schedules were developed to produce the information necessary for tracking families’ progress on the key outcomes of interest. In order to track the progress of the families in both treatment and control/comparison groups, the data need to be collected on the specified schedules.

**A7. Special Circumstances**

There are no special circumstances for the proposed data collection efforts.

**A8. Federal Register Notice and Consultation**

***Federal Register Notice and Comments***

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice was published on November 13, 2012, Volume 77, Number 219, page 67651-67653, and provided a sixty-day period for public comment. A copy of Federal Register notices is attached (see Attachment B). During the notice and comment period, no comments were received.

#### *Consultation with Experts Outside of the Study*

The following experts were consulted on methodological issues concerning evaluation issues:

* Patti Chamberlain, Ph.D. – expert on implementation and efficacy research, particularly implementation of parent-mediated interventions and scaling up best practices models.
* John Landsverk, Ph.D. – expert in cost calculation and implementation research in child welfare and mental health interventions.
* Andrew Barclay, M.S. – expert in database design, data analysis, and statistics, particularly as applied to child welfare.
* Linda Collins, Ph.D. – expert on optimization of behavioral interventions, particularly on adaptive designs for prevention.

**A9. Incentives for Respondents**

We plan to provide a token of appreciation to respondents for participating. These amounts are based past experience in conducting interviews with child welfare populations and on local experience with providing respondents with small monetary gifts and gift cards.

DCFS

For each interview, the biological parent will receive a $15 gift card and the foster parent and youth each will receive a $20 gift card in appreciation for their participation.

RISE

RISE is working with the California child welfare system to select a token of appreciation that the state workers in Los Angeles County will be allowed to receive. Cash is not allowed, so it might be an item such as a mug or water bottle, worth approximately $10.

**A10. Privacy of Respondents**

All consent forms include assurances of privacy. These assurances, which are included in the IRB applications for all PII grantees, include:

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

**A11. Sensitive Questions**

The data collection batteries for the grantees’ evaluations include questions that might be perceived as sensitive. The information is required for monitoring changes in the families and measuring outcomes as part of the evaluations. These may include questions about behavior and mental and psychological problems potentially embarrassing to respondents. Information gathered through the batteries is necessary to monitor critical issues related to safely returning a child to his or her family. Respondents will be informed that there may be sensitive questions and that their participation in all aspects of data collection is voluntary.

**A12. Estimation of Information Collection Burden**

***Previously Approved Information Collections***

We have used 752 hours (26%) of the previously approved 2,922 hours, as shown in Table A1.

| Table A1. Previously Approved Information Collections Approved Hours and Hours Remaining | | | | | | |
| --- | --- | --- | --- | --- | --- | --- |
| Instrument | Previously Approved Annual Burden Hours | Hours Used | Annual Burden Hours Remaining | | | |
| **CROSS-SITE IMPLEMENTATION STUDY:** |  |  | | |  | | |
| Survey of Organization/System Readiness | 18 | 12 | | 6 | | |
| Implementation Drivers Web Survey | 240 | 10 | | 230 | | |
| Grantee Case Study Protocol | 240 | 40 | | 200 | | |
| Fidelity Data (Implementation Quotient Tracker) | 24 | 0 | | 24 | | |
| *Cross-Site Estimated Total* | *522* | *62* | | *460* | | |
| **KANSAS:** |  |  |  | | |
| Caregiver Initial Information Form | 30 | 10 | | 20 | | | |
| Family Assessment Battery | 900 | 297 | | 603 | | | |
| CAFAS/PECFAS | 630 | 196 | | 434 | | | |
| Caseworker discussions for NCFAS-G&R completion | 315 | 105 | | 210 | | | |
| *Kansas Estimated Total* | *1875* | *608* | | *1267* | | | |
| **WASHOE COUNTY:** |  |  | |  | | | |
| Family Assessment Battery | 525 | 69 | | 456 | | | |
| *Washoe Estimated Total* | *525* | *69* | | *456* | | | |
| **OVERALL TOTAL** | **2922** | 739 | | **2183** | | | |

***Newly Requested Information Collections***

Table A.2 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. The specific average hourly wages were as follows: $22.88[[1]](#footnote-1) for the parent/foster parent interviews; $20.00[[2]](#footnote-2) for DCFS caseworkers; and $29.96 for caseworkers responding to the RISE staff surveys.[[3]](#footnote-3) Children and youth do not have an hourly wage. The total annual burden for this information collection is expected to be 888 hours.

| Table A2. Total Burden Requested Under this Information Collection | | | | | | | |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Instrument | **TOTAL** Number of Respondents | Number of Responses Per Respondent | Average Burden Hours Per Response | Total Burden Hours | **ANNUAL**  Burden Hours | Average Hourly Wage | Total Annual Cost |
|  |  |  |  |  |  |  |  |
| **DCFS:** | | | | | | | |
| DCFS Biological Parent Study Contact Form | 1 | 518 | .1 | 52 | 17 | 20.00 | 346.00 |
| DCFS Biological Parent Interview | 518 | 2 | .25 | 259 | 86 | 22.88 | 1967.68 |
| DCFS Youth and Foster Parent Study Contact Form | 1 | 684 | .1 | 68 | 23 | 20.00 | 460.00 |
| DCFS Foster Parent Interview | 684 | 2 | .75 | 1026 | 342 | 22.88 | 7824.96 |
| DCFS Youth Interview | 684 | 2 | .75 | 1026 | 342 | -- | -- |
| DCFS burden total | | | | 2431 | 810 | -- | 10598.64 |
| **RISE:** | | | | | | | |
| RISE Staff Pre-Test | 470 | 1 | .25 | 117.5 | 39 | 29.96 | 1168.44 |
| RISE Staff Post-Test | 470 | 1 | .25 | 117.5 | 39 | 29.96 | 1168.44 |
| RISE burden total | | | | 235 | 78 | -- | 2336.88 |
|  | | | | | | | |
| **Estimated Annual Burden Total** | | | |  | **888** | **--** | **12935.44** |

***Total Burden***

The total annual burden under OMB #0970-0408 will be 2,183 annual hours remaining for previously approved instruments (table A.1) in addition to 888 annual hours for instruments under review in this request. **This is a total of 3,071 hours under OMB #0970-0408.**

***Total Annual Cost***

The total annualized cost of this information collection will be $12935.44.

**A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be $1,127,497 for DCFS and RISE, and $2,367,057 remaining for Kansas, Washoe, and the cross-site implementation study, for a total of $4,074,813. Annual costs to the Federal government will be $1,358,271 for all proposed data collection activities under OMB #0970-0408*.*

**A15. Change in Burden**

This is an additional information collection request under OMB #0970-0408.

**A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

***Analysis Plan***

The primary outcome for all sites will be achievement of permanency and length of time needed to achieve permanency from entry into the child welfare system for the treatment and control groups of children. This type of data is censored, as at end of the follow-up time, there will be children in the study for whom permanency has not yet been achieved and thus complete information as to the length of time needed to achieve permanency is not available. For this type of data, survival analysis techniques will be used to take into account the censored nature of the data. All sites will have AFCARS administrative data and this will provide important covariates that can be used to adjust for variation in permanency outcomes or in the length of stay measure, so that the true effect of the treatment - our primary focus in the study - may be gauged. In particular, we may want to adjust for the sex, race, and age of the child, and for any disability that the child may have. These are likely to impact both exit to permanency and the length of stay in the system. Other secondary information available includes reason for removal, abuse, number of previous removals, etc., and if appropriate, these data items may also be used to adjust for possible differences in the outcome being analyzed. Additionally, every site will be collecting data on proximal outcomes that will differ from site to site. These will be examined within each site for additional insights into the permanency process but will not be generalizable across sites.

***Time Schedule and Publication***

Table A3 outlines the estimated time schedule for data collection, analysis, and publications.

| Table A3. PII Evaluation Timeline | | | | | |
| --- | --- | --- | --- | --- | --- |
| Task | Prior Package (PII1) | | | Current Package (PII2) | |
| Cross-Site | Kansas | Washoe | DCFS | RISE |
| Data Collection, Data Cleaning, and Quality Assurance | 9/1/12 – 5/31/15 | 9/1/12 – 3/31/15 | 9/1/12 – 3/31/15 | 8/1/13 – 3/31/15 | 8/1/13 – 3/31/15 |
| Create Analysis Files of Primary Data | 1/15 – 6/15 | 4/15 | | | |
| Receive Administrative Data | 3/1/14, 3/1/15 | | | | |
| Clean Administrative Data and Create Analysis Files | 3/1/14 – 4/30/14, 3/1/15 – 4/30/15 | | | | |
| Data Analysis | 2/15 – 7/15 | | | | |
| Draft Report | 7/30/15 | | | | |
| Final Report | 9/30/15 | | | | |

**A17. Reasons Not to Display OMB Expiration Date**

All instruments will display the expiration date for OMB approval.

**A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.

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1. Average hourly wage is from Bureau of Labor Statistics, Current Employment Statistics Survey, 2011. [↑](#footnote-ref-1)
2. Average caseworker hourly wage was supplied by DCFS via email on 10/22/2012. [↑](#footnote-ref-2)
3. Average caseworker hourly wage was supplied by RISE via email on 6/14/2012. [↑](#footnote-ref-3)