

Permanency Innovations Initiative

**Pre-Testing of Evaluation Surveys
(OMB 0970-0355)**

Supporting Statement Part A

August 2012

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 Los Angeles Gay and Lesbian Center's project RISE (Recognize Intervene Support Empower), will be ready to begin pilot testing its data collection instrument and procedures in August 2012. ACF requests permission to conduct pilot testing of the staff assessment instrument and procedure. 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 so that the data collection is acceptable to workers and achieves a high response rate.

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 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 5-16, 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 includes staff training to enhance the cultural competence of the DCFS office or private agency. The pilot test will assess the procedures and instrument for collecting data on how worker LGBTQ competence changes from before the training to after. (The CCT component will be pilot tested on nine or fewer children, so this information collection request is just for testing the staff survey.) Ultimately, after the pilot test is complete, the data collected through the full evaluation will provide information on the extent to which the intervention achieved its goal of faster permanency for LGBTQ and gender-nonconforming children and youth. The plan for the full evaluation will be submitted for OMB review in the future.

RISE's pilot test will include workers from two DCFS offices and five private foster care agencies, who receive the competency training. The data from the pretest will be used to understand the time

required to administer the instrument, workers' receptivity to their assessment, and the instrument's 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 workers, we plan to offer to administer the pretest in the training location, immediately before the first training begins. The posttest will be conducted three months later at a location convenient for the workers and the DCFS offices/private agencies.

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

The proposed instruments are not currently in use in Los Angeles County, so there is no duplication or similar information collected in another way.

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 to renew ACF's generic clearance for pretesting was published in the Federal Register on June 10, 2011 (vol. 76, no. 112, p. 34077), inviting public comment on our plans to submit this request. ACF received no comments or questions in response to this notice.

The second Federal Register notice was published in the Federal Register on August 29, 2011 (vol.76, no. 167, p. 53682).

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

We will not provide any payment or gift to respondents.

A.10. Assurance of Privacy Provided to Respondents

The RISE pilot test will have a full range of assurances for privacy, which will be submitted to the Westat IRB by July 31, 2012 and reviewed on August 14. 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' privacy will be followed by all project staff. RISE will maintain a crosswalk of worker names and ID numbers, so that we can match a worker's pretest with their posttest without the worker's name appearing on the instrument.
- 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.

The evaluation has received a Certificate of Confidentiality from the National Institute for Health.

A.11. Justification for Sensitive Questions

The worker instrument does not include any sensitive questions. It asks about various behaviors and attitudes that indicate LGBTQ competence. See Attachment A for the consent forms and instrument.

A.12. Estimates of Annualized Burden Hours and Costs

Table A.1 contains the estimated burden hours for each respondent. The total annual burden for this pretest activity is expected to be 300.0 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
Worker Survey (pre/post)	500 ¹	2.0	0.3	300.0	29.48 ²	8,844.00
Estimated Total	--	--	--	300.0	--	\$8,844.00

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

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

A.14. Annualized Cost to Federal Government

¹ We will administer the pretest and posttest to a convenience sample of the first 250 (at most) private agency staff and 250 (at most) DCFS county staff that receive training. RISE plans to deliver the training sessions to a maximum of 25 workers per session. We will go to the first 10 trainings at private agencies and the first 10 trainings at DCFS offices and deliver the pretest, then go back 3 months after the training sessions to administer the posttest to the same workers.

² RISE provided hourly wage information for private agency and county workers. Average hourly wage for the 400 private agency workers is \$20.00. Average hourly wage for the 400 DCFS county workers is \$38.96. Overall average for all 800 workers is \$29.48.

The annualized cost to the federal government for the piloting activities is \$82,423.

A.15. Explanations for Program Changes or Adjustments

This will be a new data collection effort in Los Angeles. Pilot testing is needed to assess the timing of the instrument and the acceptability to workers, 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 pilot test process. The information that is collected will be for internal use only. The pilot test will be conducted from August 2012 through May 2013.

A.17. Display of Expiration Date for OMB Approval

The OMB number and expiration date will be displayed on the instrument and consent forms, as shown in Attachment A.

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

No exceptions are necessary for this data collection.