# Application for Renewal of the *Runaway and Homeless Youth*

## *Management Information System* (RHYMIS)

## Version 3.0

## OMB # 0970-0123

**Supporting Statement**

**Office of Data, Analysis, Research and Evaluation**

**Administration on Children, Youth and Families**

**Administration for Children and Families**

**U.S. Department of Health and Human Services**

**August 22, 2014**

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# A. Justification

1. **Circumstances Making the Collection of Information Necessary:**

The Runaway and Homeless Youth Act (RHYA), as reauthorized by the Reconnecting Homeless Youth Act of 2008 (P.L.110-378 ) (42 U.S.C. 5601), mandates that the Department of Health and Human Services (HHS) report regularly to Congress on the status of HHS-funded programs serving runaway and homeless youth. Organizations funded under the Runaway and Homeless Youth (RHY) program are required by Section 312 (b) (7, 8, 11 and 12) and Section 322 (a) (9, 12, 13 and 14) of the Statute to meet several data collection and reporting requirements. These requirements include maintenance of client statistical records and submission of annual program reports regarding the characteristics of the youth and families served and the services provided to them. (Attached as Exhibit 1 are the relevant sections of the statute and regulation mandating the collection of information) The October, 2008, reauthorization of the Act maintained the longstanding requirements as described in the legislation.

The Reauthorization also requires that HHS (1) report on promising practices in preventing youth homelessness and (2) evaluate the homelessness prevention and intervention effectiveness of the Transitional Living Program (Part B of the Act). RHYMIS data is central and critical to both mandates. The report was issued in May, 2007. RHYMIS data also assisted in assessing grantee service volumes in order to identify potential participants for the Transitional Living Program Evaluation. The report for this evaluation, which is being conducted by an independent research organization, will be available in FY2018. .

The data from the Runaway and Homeless Youth Management Information System (RHYMIS) support the grantee organizations as they carry out a variety of integrated, ongoing responsibilities and projects.

**2. Purpose and Use of the Information Collection:**

RHYMIS data collection instruments will be used by Federal and grantee staff responsible for planning, funding and implementing projects that assist runaway and homeless youth. Specific organizations include: ACYF Family and Youth Services Bureau (FYSB) along with its Regional outstations; the ACFY Office of Data, Analysis, Research and Evaluation (ODARE); the ACF Office of Planning, Research and Evaluation (OPRE), Assistant Secretary for Planning and Evaluation (ASPE); Department of Justice (DOJ); Children’s Bureau (CB); Basic Center Program (BCP), Transitional Living Program (TLP), and Street Outreach Program (SOP) grantees; academics, HHS research, evaluation and support contractors; and RHY Training and Technical Assistance providers. Additionally, NEORHYMIS is the source for the data contained in the *Biannual Report to Congress on the Youth Programs of the Family and Youth Services Bureau* (mandated by RHYA) and the ACF Annual Performance Plan and Performance Reports for the President’s Performance Budget. The data is requested from time to time by Congressional staff, officials from State and local levels of government, researchers, and practitioners, within and beyond the RHY community of grantees.

RHYMIS data supports several integrated, ongoing responsibilities and projects, including legislative reporting requirements, planning and public policy development for runaway and homeless youth programs, accountability, monitoring, program management, research, and evaluation. The information collected through RHYMIS has a significant role in supporting the requirements and needs of the RHY projects, including reporting requirements, research and evaluation, monitoring, program management, and providing documentation in support of applications for funding.

1. **Use of Improved Information Technology and Burden Reduction:**

It is important to note that this request for approval pertains to the RHYMIS data collection instruments and not the data collection system itself.

For well over a decade, the designated data collection system for the Runaway and Homeless Youth program has been known as the National Extranet Optimized Runaway and Homeless Youth Management Information System (NEORHYMIS). NEORHYMIS is operated pursuant to the Runaway, Homeless Youth and Missing Children’s Assistant Act (P.L. 108-96), which in 2008 reauthorized the Runaway and Homeless Youth Act (RHYA, P.L. 107-33).

*Opening Doors*, the Federal Strategic Plan to Prevent and End Homelessness, is a roadmap for Federal agencies working with homeless populations to reach the shared goals of ending Veterans and chronic homelessness by 2015; and ending homelessness among children, families, and youth by 2020. To achieve this goal, the plan sets an objective of strengthening capacity and knowledge about homelessness, and one strategy for doing so is to facilitate increased use of HUD’s Homeless Management Information System (HMIS) in communities as a resource for coordinated services and accurate counting of the homeless.

HMIS is the administrative data and reporting system for all local Continuums of Care (CoC). CoCs were established by HUD to promote the efficient coordination and support of local programs targeting homeless populations, and to improve data collection and performance measurement on the homeless. Almost half of FYSB’s RHY grantees are already members of their local CoC. FYSB fully supports the Opening Doors initiative, and in FY15 will require all RHY grantees to join their local CoC and to use its HMIS data system for all RHYMIS reporting. Each grantee’s data will be exported from HMIS and into a redesigned RHYMIS data transfer and reporting system.

HUD and its federal partners, including FYSB, have developed a new set of data standards for all HMIS data systems, which fully incorporate the measures to be reported under RHYMIS. The great majority of the measures collected previously in RHYMIS have been incorporated into the new standards, with some new measures added, while others have been modified to improve quality and/or standardize the measure across programs using HMIS. The RHY program questions referenced in this supporting statement and request for approval were included in the draft HMIS Data Standards Notice published for public comment in April 2013 (Notice CPD-13-017). The final data standards and accompanying data dictionary were published in May 1, 2014 and can be found at <https://www.hudexchange.info/news/federal-partners-release-final-2014-hmis-data-standards/> .

Independent software venders incorporate these standards into the HMIS administrative data software used by CoCs. There are currently over 20 different HMIS software packages in use by local CoCs around the country. These changes are expected to be implemented over the course of FY 2015 and fully incorporated into all software packages by October 1, 2016. All will share identical data standards regarding the core measures identified in the HMIS data dictionary.

HUD approved vendors must maintain a standard of compliance, efficiency and security as outlined in the technical data standards. These standards require that all federal partner data measures be present, all HHS security and privacy protocols be met, and that program data for each federal partner will be easily accessible to respective program offices.

For the Runaway and Homeless Youth Program, once data are collected in the various HMIS interfaces, de-identified individual youth level data from all RHY funded grantees, will be uploaded into the RHYMIS transfer database where it will be received and validated by the designated RHY Technical Assistance Contractor.

1. **Efforts to Identify Duplication and Use of Similar Information:**

There are no other sources of information available to be reported to HHS on unaccompanied runaway and homeless youth and therefore, the RHYMIS data collection effort does not duplicate any existing data. In fact, RHYMIS is the only uniform collection process that results in accurate, timely and consistent information that can be reported to HHS regarding the number, composition and characteristics of runaway and homeless youth served by the RHY programs as mandated by Congress in the RHY Act.

Currently, there are a variety of youth services information management systems operating at the regional, state, and local levels. These systems are not fully compatible throughout grantee or federal collection efforts and cannot be compiled into one national database. The RHYMIS transfer database will continue to be able to accept properly formatted and defined national RHY data from individual systems that are already in place.

RHYMIS addresses the issue of data duplication on a number of levels:

1. Almost half of all RHY grantees currently receive HUD funding and therefore are already connected to their Continuum of Care and have a designated HMIS interface already in place. This significantly reduces the burden of reporting duplicate data to multiple funding sources.
2. RHYMIS collects information about programs and youth only once. Only changes in the status of the grantee program or in the status of a youth require new information. Each HMIS data system utilizing the RHYMIS data measures is designed to allow the grantee to edit and integrate new information with existing information. These edit and integration features minimize data collection, data entry, and reporting burden.
3. Since RHYMIS supports the BCP, TLP, and SOP in the same HMIS software package, a community agency that receives funding under more than one of these RHY programs will have to complete universal data information on its agency only once.
4. RHYMIS data collection is designed to assist the RHY grantees in meeting other reporting requirements and information needs. These include reporting RHYMIS data to other funding sources and documenting services for licensing requirements. A grantee will be able to indicate that a particular caseload record, utilizing all or some of the RHYMIS elements, is a “non-FYSB” youth, and RHYMIS treats that record as such, and does not include it with the FYSB records during data transfer. However, grantees will be able to create reports around those records to report to other funding entities.

**5. Impact on Small Businesses or Other Small Entities:**

The labor and one-time hardware costs for collecting this information is paid for by the grant to the community-based organizations funded by the RHY Act and through the HUD funded Continuum of Care funding stream. The software and technical support is available to all licensed users The time required for staff to enter the data for the various subset reports is small and organizations will already have collected the data on each youth for many of the data elements. Data can be entered from existing hard copy records or grantees can opt to enter data directly into the data system at the time that the youth appears for intake and exit or while services are being administered to the youth. Although at the discretion of the individual agency’s protocol, the latter option would result in the smallest impact.

**6. Consequences of Collecting the Information Less Frequently:**

HHS cannot fulfill its obligation to effectively serve the runaway and homeless youth population in the United States, nor report meaningful and reliable information to Congress about the extent of this problem or the effectiveness of various methodologies designed to provide assistance to this population, without access to timely and accurate information. To be of any value, this information must include specific data elements that are defined in a consistent manner and collected and reported using standard procedures. RHYMIS defines the required data and provides required procedures and reports. Grantees currently use the data in justifying applications for grants, not only when they re-compete for FYSB funding, but for other programs serving at risk youth as well.

Since FYSB uses the data as mandated in annual reporting to Congress under GPRA and bi-annual reporting under RHYA, the data must be collected on an annualized basis. Prior to 2000, grantees reported quarterly. The newer versions called for semi-annual reporting, which reduced the workload on grantees. However, as a result of the HMIS integration effort, semi-annual reporting will continue to allow for data analysis and quality programmatic review. Grantees are better off entering the data as they obtain it or soon after, to ensure accuracy. They can access RHYMIS for data entry, review and editing at any time. The annual submission is a mostly automated process that requires little labor. Most of the users' work in operating their RHYMIS integrated data system will involve case data entry on an ongoing basis. Aggregating this youth information on less than a semi-annual or basis will delay the grantees' ability to benefit from the information contained in the national database, to identify how closely their own clients reflect the national RHY profile or for FYSB to develop programs that most effectively meet their clients’ needs.

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

There are no special circumstances regarding the collection of this data. No individually-identifying information enters the report when it is transmitted to Washington for integration in the national database. Youth are tracked using anonymized, system-generated IDs. Standard and mandated security features and confidentiality protections are built in and fully implemented.

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

On May 16, 2014 we initiated the regular clearance process with a 60 day notice in the Federal Register, (Volume 79, Number 96, Page 28731). A copy of the first Federal Register notice is provided in Exhibit 2.

To date, we have only received requests for copies of the data collection tools, we have not received any public comments that offer a critique or suggestions for the revised RHYMIS data elements.

**9. Explanation of Any Payment or Gifts to Respondents:** There is no remuneration, of any kind, to RHYMIS users. Participation in data collection is mandated for all RHY grantees.

**10. Assurance of Confidentiality Provided to Respondents:** The RHYMIS integrated HMIS system will maintain HHS required built-in, structured security mechanisms that assure the confidentiality of the clients. These mechanisms include:

* Unique Identifiers **-** The HMIS data collection system assigns unique agency identification numbers to BCP, TLP, and SOP grantees. The youth identification number is generated by the automated system according to a secure, programmed algorithm. Once a youth is added into the database, only his/her identification number appears on data entry screens and storage files. Individual client files are accessible only to authorized grantee staff and are never transferred to the Federal RHY program, HUD, its federal partners or its contractors.
* Informed Consent - Youth and families are informed about the data collection process, and are asked to sign an informed consent form documenting their awareness and understanding of the data collection process before any data elements are entered into the system. Refusal to participate in the data collection process does not preclude a youth or family from receiving services.
* System Security/User Identification - Access to each data file within RHYMIS is limited by the use of an authorized user identification number, password, and other security procedures. The grantee's management controls all access to data. The terms and conditions of their grant requires security and confidentiality protection. As a condition of funding, each grantee is required to provide a detailed summary of all agency privacy protocols that govern the security of data, files and youth identity.

11. Justification for Sensitive Questions:

There are some RHYMIS data elements that are designed to collect information that may be considered sensitive. This information pertains to the youth and their family's socio-economic status, mental health, alcohol and other drug involvement, legal status, gender identity, sexual orientation, and family and social relationships. There are some of the more newly collected data measures includes information about commercial sex exploitation, overall health and disability status. It must be noted that, prior to participating in a project, all youth and families are informed that information about them and the services they receive, will be collected, recorded, and submitted anonymously to FYSB/ODARE for statistical analysis. As stated above, youth and families are assured that all information is strictly confidential and that their identities are protected. Additionally, program participants are required to sign a statement of agreement that acknowledges that this information as well as their rights have been explained to them.

The RHY program routinely captures data regarding youth gender identity and sexual orientation. Research suggests that LGBT youth make up an overwhelming share of all youth who are homeless or living on the street. Many of these youth are rejected by their families or experience other trauma that may result in increased risk taking behaviors. It is important that we capture this data in order to get a more accurate count of this population and learn what services are needed.

In support of agency wide anti-trafficking initiatives, RHYMIS will now capture data on commercial sex exploitation statistics. With this new data measure, we will be able to learn exactly how pervasive sexual exploitation and trafficking is in the RHY community. Homeless youth are especially vulnerable to domestic trafficking because they are likely to engage in survival sex in order to have a place to sleep or for other basic needs.

This information is extremely critical for FYSB to ensure the effective delivery of services, use of appropriate interventions and the development of individualized youth and family service plans. It is also essential to assess the attainment of long term programmatic goals and outcomes and for the early identification of trends and problems in the field of RHY.

**12. Estimates of Annualized Burden Hours and Costs:**

Changes in the burden normally result from varying numbers of grantees in each year and fluctuating youth caseloads. The increased burden this year is based purely on a more realistic calculation. Instead of counting the BCP and TLP “Youth Entry” and “Youth Exit” records as separate and single responses (one of each for each youth), we have since adopted an open record format. This means that each youth per program have a finite number of questions required per youth record. Rather than designate them as entry or exit, we have opted to label each record as a youth profile. Once the universal or demographic data are entered for each youth profile, records can be updated as new information becomes apparent or as services are delivered. This includes the ability to update program completion or exits without having to complete an entire exit record, which ultimately reduces burden for grantees.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Instrument | Number of Respondents\* | Number of Responses per Respondent | Average Burden Hours per Response | Total Burden Hours |
| Youth Profile: Basic Center Program (one for each youth) | 321 | 115 | 0.20 | 7383 |
| Youth Profile: Transitional Living Program (one for each youth) | 205 | 19 | 0.250 | 974 |
| Youth Profile: Street Outreach Program (one for each youth) | 138 | 524 | 0.073 | 5279 |
| Brief Agency Contacts Report \*\* (3 data elements per youth) | 664 | 865 | 0.05 | 28718 |
| Data Transfer | 664 | 2 | 0.50 | 664 |

**Estimated Total Annual Burden Hours:** **43, 018**

\* Number of respondents and response estimates are based on FY 2013 grantee award and annual youth service volumes (the number of grantees awarded and their service volumes change from year to year but not greatly.)

\*\* Brief Agency Contacts Report is a new report that combines the elements of the Street Outreach Contacts, Turnaway/Waitlist and Brief Contacts reports that were previously in place.

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

|  |  |  |  |
| --- | --- | --- | --- |
| **Task / Item** | **Annual Number** | **Annual Cost** | **Estimated Annual Cost** |
|  |  |  |  |
|
|
|
|  |  |  |  |
| **Total** |  |  | **0** |

**NOTES:**

1. There are no direct out of pocket costs to grantees to collect data. System licensing includes training, ongoing technical support, software and receipt of any system specific instructional documentation. In addition to the technical assistance provided by the vendor, additional training will be provided by HMIS administrators, RHYTTAC, RHY program officers and grantees will also have access to online tutorials that provide instructional support for RHYMIS data collection through HMIS.
2. The annual number listed represents grantees awarded for all RHY programs. Many grantees receive multiple awards and therefore, do not necessarily purchase system licensing for each separate grant awarded. It is also important to note that it is estimated that system licensing costs will potentially impact about half of our RHY grantees, only those who are not also funded by HUD. Agencies are allowed to include costs for computers and internet for data entry purposes and system licensing as part of their competitive proposals.
3. **Annualized Cost to Federal Government:**

|  |  |
| --- | --- |
| **Task / Item** | **Estimated Annual Cost** |
|
|
| 1.      Technical Assistance and Training | **$265, 600** |
|
|
|
|
| 2.      System Maintenance and Upgrades | **$88,570** |
|
|
|
|
| 3.      Data Analysis and Reporting | **$89, 826** |
|
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|
|
| 4.      National Data Transfer Coordination | **$361, 815** |
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|
|
|
| 6.      Federal Gov’t Staff\* | **$9,400** |
| 7.      Federal Gov’t Travel | **$2,000** |
| **Total** | **$817, 211** |

\* GS 13-2 project officer @ .1 FTE

Note: Activities 1 through 5 are provided under a contract with Computer Sciences Corporation (CSC). Costs allocations among tasks 1-5 are approximations.

**15. Explanation for Program Changes or Adjustments:**

The burden change is primarily due to a few reasons. On reason is that the additional agencies being funded changes the numbers of youth being served and the number of grantees expected to respond, both of which fluctuate from year to year. For example, in 2013 the number of grantees had decreased somewhat from the 2010 count in the previous application and the number of youth had decreased. Additionally, we have reduced the number of collection instruments because of the way that we capture data in the new HMIS data system.

Instead of collecting the BCP and TLP “Youth Entry” and “Youth Exit” records on separate collection instruments, we have since adopted an open record format. This means that each youth per program have a finite number of questions required per youth record. Rather than designate them as entry or exit, we have opted to label each record and instrument as a “Youth Profile”. Once the universal or demographic data are entered for each youth profile, records can be updated as new information becomes apparent or as services are delivered. This alleviates the need to delay data entry until a youth exit has occurred.

In addition to this ease of use, the overall burden to federal homeless providers are significantly reduced as they will now only use one data system to enter data about clients served.

There are slight increases in burden as it pertains to specific reports. For example, in past versions of RHYMIS, SOP grantees were only required to report aggregate data regarding hygiene, outreach, food and shelter provisions. The challenge with this method is that we could not record the number and duration of contacts that outreach workers had with individual youth before they were willing to accept shelter. Additionally, we were unable to determine the volume and characteristics of this very vulnerable population. In this newest version of RHYMIS, the Street Outreach Program (SOP) Youth Profile requires grantees to develop individual youth level records of the street youth who are contacted and the serviced by the program. Street youth are an especially vulnerable population who are often victimized through sexual trafficking and are exposed to other dangers of living on the street. By getting a more accurate and unduplicated count we can better understand the volume, characteristics and service needs of this population.

In order to preserve our ability to capture aggregate data, we have combined the former Street Outreach, Brief Contacts and Turnaway/Waitlist collection tools into one Brief Agency Contacts Report. This report will allow us to capture data regarding the youth who contact the agency for assistance or who are encountered by street outreach teams, but for whom a formal youth profile will not be created in RHYMIS.

The Data Transfer report is a report that is received by the program office twice annually. During the National Data Transfer period, grantees will be required to submit a system generated report that compiles all of their youth records completed during the requested period. Grantees will only have to push a button to create the report and send it online through a secure server.

**16. Plans for Tabulation and Publication and Project Time Schedule:**

The RHYMIS data that will be collected in HMIS will be analyzed to determine the characteristics of runaway and homeless youth, their problems, and services provided to them. As exemplified under “Use of Data”, ODARE/FYSB also will conduct statistical analyses on information about runaway and homeless youth and program activities in order to develop management improvement strategies suggested by statistical trends and patterns.

The data collected through RHYMIS will be published by FYSB, as required by Federal law (RHYA), in a report to Congress on the BCP, TLP, and SOP programs. The data will also support FYSB's annual performance plans under the Government Performance and Results Act and appear in Congressional testimony and briefings. Brochures, fact sheets, and other publications periodically produced by FYSB also will include information gathered by RHYMIS. These publications will inform potential grantees and the general public about the breadth and scope of the runaway and homeless youth programs, and will support the identification of trends and problems among runaway and homeless youth served in RHY programs. RHYMIS data may also appear in reports and evaluations on the prevention of youth homelessness which have been mandated by the authorizing legislation. Currently, our RHY national database allows end users to access RHY administrative data in aggregate and provides ad hoc reports can be generated by region, state and individual grantee. <https://extranet.acf.hhs.gov/rhymis> is where the database is located. .

In addition to the current reporting streams for program data, Runaway and Homeless Youth will now be included in the HUD Annual Homeless Assessment Report (AHAR) which provides a national profile of all homeless individuals, families and now, unaccompanied youth who reside in homeless shelters across the country.

**Project Time Schedule (Occurs each FY):**

|  |  |
| --- | --- |
| Contractor identifies Continuum of Care lead and distributes RHYMIS instruction and definition manual | October FY2015 |
| Live or self-directed online tutorial is made available to new/current grantees | October FY2015 – February FY2015 |
| Contractor Receives, Cleans and Validates 1st Semi Annual Data Transfer  (Covering October 1 – March 30) | April FY2015 |
| Contractor Receives, Cleans and Validates Data 2nd Semi Annual Data Transfer (Covering April 1 – September 30) | October FY2016 |
| FYSB provides FY 15data to GPRA performance report to Congress | December FY2016 |

**17. Reason(s) Display of OMB Expiration Date is Inappropriate:**  Not applicable: Dates and notice are displayed on most RHYMIS forms and literature.

# 18. Exceptions to Certification for Paperwork Reduction Act Submissions: This issue is not applicable. There are no exceptions to the certification statement identified on Form OMB 83-I.

# Statistical Methods:

1. **Respondent Universe and Sampling Methods:**

This is not applicable as data will not be collected by statistical methods. Instead, each grantee is required to submit data on all FYSB-funded RHY youth on a semi-annual basis.

1. **Procedures for the Collection of Information:**
2. Upon receipt of funding award, each new RHY grantee is assigned to the Continuum of Care that presides over their jurisdiction.
3. Each grantee is required to identify two data entry points of contact so that a direct line of communication can be established.
4. Grantees will gain access to the HMIS data entry system and will receive a RHYMIS instruction and definitions manual.
5. Each grantee will have access to both online self-directed and webinar-based tutorials for training on the use of the HMIS System itself and the RHYMIS data measures as required by FYSB.
6. Grantees will begin to be notified of the upcoming data collection period 90 days before the required date of submission.
7. On the assigned day of submission, grantees will electronically forward their de-identified, individual level to the Technical Assistance contractor.
8. Data will be received and validated by the Technical Assistance contractor who will also work directly with grantees in the event that their data is problematic.
9. A final compilation of RHYMIS data is submitted to the program office for use in reporting GPRA and other reports to congress.
10. Each year, new grantees will follow the same process. All currently funded grantees will repeat steps 4 – 8 each year.
11. **Methods to Maximize Response Rates and Deal with Non Response:**

The ease of use and favorable reception from grantees regarding the RHYMIS data collection system has resulted in a 99% response rate. It is our expectation that after all grantees have been sufficiently migrated to and trained in HMIS, that our response rates will remain high. Almost half of our grantees are currently using HMIS to report homeless services data to HUD in addition to using NEORHYMIS to submit data to FYSB. Not only does this mean that many grantees are already well versed on using the data system, but with the integration of RHYMIS data into the collection system, the burden of data collection will have been significantly reduced. The procedures for notification will continue to include:

1. Grantee receipt of periodic reminders of upcoming transfer dates via email from the Technical Assistance providers, from the grantee’s Continuum of Care lead and through HMIS system updates.

1. RHYMIS Technical Assistance staff will work with grantees to resolve any technical issues
2. In the event that a grantee is consistently negligent in meeting their data submission obligations, Grantees who fail to submit on time will receive notification that they are obligated to submit data as a condition of funding and a corrective action plan may be put in place.

1. **Test of Procedures or Methods to be Undertaken:**

This is non-applicable.

1. **Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data:**

It is important to note that our data collection and technical assistance and support contract is currently under competition. Until new contractors are awarded, CSC, our long time technical assistance provider, will continue to provide quality technical assistance to grantees and remain responsible for coordinating the receipt and validation of data for the RHYMIS data collection effort. Additionally, we have had extensive discussions regarding the technical aspects of data system integration to ensure that a majority of our protocols will be preserved, Our principle contacts are:

AVI MARGOLIS, Senior Principal Michelle Budzek

CSC, Incorporated The Partnership Limited

15245 Shady Grove Road 2134 Alpine Place

Rockville, MD 20850 Cincinnati, OH 45206

301.921.3033 513-891-4016

**EXHIBIT 1: Legislative/Regulatory Authority**

Sections of legislation and regulations relevant to information collection

For RHY programs

**Legislative:**

The Runaway and Homeless Youth Act (Title III of the Juvenile Justice and Delinquency Prevention Act of 1974), as Last Amended by the Reconnecting Homeless Youth Act of 2008 (P.L.110-378) October 8, 2008

BASIC CENTER PROGRAM: Section 312 (b) PROVISIONS OF PLAN. In order to qualify for assistance under section 311(a), an applicant shall submit a plan to the Secretary including assurances that the applicant—

...

(7) shall keep adequate statistical records profiling the youth and family members whom it serves (including youth who are not referred to out-of-home shelter services), except that records maintained on individual runaway and homeless youth shall not be disclosed without the consent of the individual youth and parent or legal guardian to anyone other than another agency compiling statistical records or a government agency involved in the disposition of criminal charges against an individual runaway and homeless youth, and reports or other documents based on such statistical records shall not disclose the identity of individual runaway and homeless youth;

...

(8) shall submit annual reports to the Secretary detailing how the center has been able to meet the goals of its plans and reporting the statistical summaries required by paragraph (7);

...

(11) shall supply such other information as the Secretary reasonably deems necessary;

(12) shall submit to the Secretary an annual report that includes, with respect to

the year for which the report is submitted—

(A) information regarding the activities carried out under this part;

(B) the achievements of the project under this part carried out by the applicant; and

(C) statistical summaries describing—

(i) the number and the characteristics of the runaway and homeless

youth, and youth at risk of family separation, who participate in the

project; and

(ii) the services provided to such youth by the project;

...

TRANSITIONAL LIVING PROGRAM

Section 322 (a) ELIGIBILITY

(a) IN GENERAL. To be eligible for assistance under this part, an applicant shall propose to establish, strengthen, or fund a transitional living youth project for homeless youth and shall submit to the Secretary a plan in which such applicant agrees, as part of such project—

...

(9) to submit to the Secretary an annual report that includes information regarding the activities carried out with funds under this part, the achievements of the project under this part carried out by the applicant and statistical summaries describing the number and the characteristics of the homeless youth who participate in such project, and the services provided to such youth by such project, in the year for which the report is submitted;

...

(12) to keep adequate statistical records profiling homeless youth which it serves and not to disclose the identity of individual homeless youth in reports or other documents based on such statistical records;

(13) not to disclose records maintained on individual homeless youth without the informed consent of the individual youth to anyone other than an agency compiling statistical records;

(14) to provide to the Secretary such other information as the Secretary may reasonably require;

**Regulatory:**

**Code of Federal Regulations, 45 CFR, Chapter XIII, Part 1351: Runaway Youth Program, Sub part C, Section 1351.20 (c):**

"Grantees will also be required to submit statistical reports profiling the clients served. The statistical reporting requirements are mandated by the Act which states that "runaway youth projects shall keep adequate statistical records profiling the children and parents which it serves..." [FR Doc. 78-32473 Filed 11-27-78;]

**EXHIBIT 2: FIRST FEDERAL REGISTER NOTICE**

