

## THE SUPPORTING STATEMENT

The Office of Management and Budget (OMB) requires that for approval under the Paperwork Reduction Act a Supporting Statement must be prepared in the format specified below. Information in the Supporting Statement should be provided in a manner that is responsive to the OMB instructions, and each item must be identified using the numbering system given by OMB. If the Supporting Statement exceeds 10 single-spaced pages in length, there should be a summary not exceeding one page in length which precedes it.

Every effort should be made to keep the Supporting Statement to a length of 10-12 pages. When possible, detailed information should be placed in an attachment, which is then referenced in an appropriate place in the Supporting Statement so that interested reviewers can peruse it. Each attachment should be referenced in the text, so that a reviewer knows why it has been included and which portions may be of particular interest. Brevity and clarity with respect to both the text of the Supporting Statement and any attachments are highly desirable; only the information requested by the OMB outline and needed to understand the project should be included.

This annotated electronic version of the OMB outline for a Supporting Statement has been prepared by the ACF, Office of Planning, Research and Evaluation (OPRE), to assist in the preparation of a request for clearance of an information collection. This template can be downloaded from the PRA E-Office information collection web site.

### **General Instructions**

**A Supporting Statement, including the text of the notice to the public required by 5 CFR 1320.5(a)(i)(iv) and its actual or estimated date of publication in the Federal Register, must be entered in worksheet I. The Supporting Statement must be prepared in the format described below, and must contain the information specified in Section A below. If an item is not applicable, provide a brief explanation. OMB reserves the right to require the submission of additional information with respect to any request for approval.**

## THE SUPPORTING STATEMENT

### Specific Instructions

#### A. Justification

##### 1. Circumstances Making the Collection of Information Necessary

Public Law 106-169, enacted December 14, 1999, established the John H. Chafee Foster Care Independence Program (CFCIP) at section 477 of the Social Security Act (the Act). The law provides states with flexible funding to carry out programs that assist young people in making the transition from foster care to self-sufficiency. The law requires the Administration for Children and Families (ACF) to develop a data collection system to track the independent living services states provide to youth and develop outcome measures that may be used to assess states' performance in operating their independent living programs. We implemented this requirement by creating a collection of information entitled the National Youth in Transition Database (NYTD). The regulations for the NYTD are found at 45 CFR 1356.80. Pursuant to the regulation, states began collecting NYTD information on October 1, 2010 and submit data to ACF on a semiannual basis. There are two information collection instruments associated with this request: the **Data File** and the **Youth Outcome Survey**.

##### 2. Purpose and Use of the Information Collection

For NYTD, states report information about certain youth both in and out of foster care and the services that are traditionally offered to young adults in preparation for emancipation. States use the information to improve their independent living programs to assist youth transition to independence. We use this information to track independent living services, to assess the collective outcomes of youth, and to evaluate state performance with regard to those outcomes consistent with the law's mandate. The Fostering Connections to Success and Increasing Adoptions Act of 2008 (P.L. 110-351) allowed states to opt to extend title IV-E foster care assistance to youth ages 18 to 21. Consequently, NYTD data also are used to assess the impact of extending foster care supports to youth over age 18. Finally, we make available our raw NYTD data sets to researchers for analysis in our National Data Archive on Child Abuse

and Neglect (NDACAN).

### 3. Use of Improved Information Technology and Burden Reduction

States submit the NYTD Data File to ACF in an electronic format. We decided to use Extensible Markup Language (XML) for file transmission consistent with the E-Government Act of 2002 (Public Law 107-347) based, in part, on public responses we received during the NYTD rule-making process. ACF released its final technical specifications for the transmission of NYTD data files in [NYTD Technical Bulletin #1](#). For the NYTD Youth Outcome Survey, many states have opted to collect these data using web-based technologies designed to ease the burden related to collecting and reporting outcomes data on young people. We believe that web-based technologies have great potential to assist states in locating and engaging youth and young adults in the NYTD Youth Outcome Survey in an efficient and cost-effective way. While we have not required a specific method states must use to collect the survey data or track youth that leave foster care, we continue to provide technical assistance and other guidance to states on appropriate and allowable methods for locating youth and administering the survey using technology.

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

Congress specifically mandated that we collect data on independent living services and youth outcomes. Prior to our rule-making, we analyzed the sources and reporting instruments already in use in the collection of independent living services information and concluded that the type of data in the NYTD is not collected elsewhere. Specifically, we examined both federal and non-federal data sources such as:

- Federal data collection systems such as the Adoption and Foster Care Analysis and Reporting System (AFCARS), and the Runaway and Homeless Youth Management Information System (RHYMIS);
- State, county, and local governments with integrated and/or complementary data systems such as Statewide Automated Child Welfare Information Systems (SACWIS); and
- Data collection efforts of non-governmental organizations such as Casey Family Programs, United Way, Lutheran Social Services, Catholic Social Services, Child Welfare League of America, and Public/Private Ventures.

AFCARS collects data on youth who are in foster care or who were adopted under the auspices of state child welfare agencies. Many youth that will be reported by states to the NYTD are also going to be reported to AFCARS. However, youth receiving independent living services may not be in foster care. Most youth in the follow-up population will not be in foster care at ages 19 and 21. Finally, there are separate and different authorizing statutes and penalty structures for NYTD and AFCARS that do not lend themselves to combining the databases.

## 5. Impact on Small Businesses or Other Small Entities

This information collection is required of state agencies only and does not impact small businesses or other small entities.

## 6. Consequences of Collecting the Information Less Frequently

This data collection is mandated by law, therefore we would be out of compliance with the statutory requirements if we did not collect independent living service and youth outcome information. In the regulation, we require that states submit NYTD data to ACF every six months, which is the same reporting frequency as AFCARS. We believe that any less frequent reporting may increase the risk of states reporting inaccurate or missing data. Further, we chose a semi-annual reporting period to preserve our ability to analyze NYTD data along with AFCARS data for the same youth. The six-month report period for AFCARS is integral to a number of ACF priorities and legislative requirements.

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

There are no special circumstances required in the collection of this information in a manner other than that required by OMB.

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

In response to the Proposed Information Collection Activity Comment Request, published in the Federal Register on June 10, 2015 (80 FR 32956), we received three public comments. Two commenters expressed concern that NYTD data collection alone cannot provide a full and accurate picture of the transition experiences of youth and the services states provide to aid in the transition from foster care. One of these commenters suggested comparing or integrating NYTD data with other administrative data collections on this population of youth such as information gathered on foster care placements in AFCARS, information on other public benefit programs such as Medicaid, and criminal justice information collected by courts. We agree that there are other data sources that can be used to measure youth outcomes and the performance of states in improving these outcomes. However, we believe NYTD provides an important new tool to benchmark and monitor states' performance operating the primary program (CFCIP) providing supports to youth transitioning out of foster care. We also have encouraged and demonstrated for states the many ways NYTD data can be analyzed in conjunction with what else is known about services provided to youth (e.g., state workforce data, education data, and juvenile justice data) to determine which services (type/dosage) really lead to improved outcomes.

Regarding the Youth Outcome Survey instrument, two commenters suggested that specific survey questions be revised for clarity or include additional response options. One of these commenters also expressed concern that youth would not self-report accurate information about their experiences. Because the Youth Outcome Survey questions were drafted as part of our rule-making, changing or adding survey questions is beyond the scope of consideration for this information collection activity comment request. The regulation does provide explanatory definitions of key terms used in the survey questions, however. We have encouraged states to create a youth-friendly survey methodology in which a supportive adult uses our explanatory definitions to help clarify any items that a youth does not understand. States also are permitted to ask additional survey questions of their own. Finally, while we understand the commenter's concern regarding the reliability of self-reported outcomes data, the NYTD Youth Outcome Survey was intended to capture information on the youth's understanding of their own outcomes. It is our expectation that states administer the survey appropriately to collect accurate information on youth outcomes from the youth's point of view. Instances in which the youth does not know the answer to a question (e.g., whether or not she has Medicaid), for example, can be important opportunities for the state to discuss the youth's experiences and her access to important public benefit programs such as Medicaid.

Regarding our burden estimates, two commenters questioned whether our estimates took into account all efforts a state must undertake to collect and report outcomes data on young people, including the time spent locating youth who have left foster care, explaining the purpose of the survey, administering the survey and inputting that data into the state's child welfare information system. As explained in Item #12, we included burden estimates for all of these activities based on our consideration of previous studies involving locating hard to reach youth populations (Meyers, 2002) and estimates from the Multisite Evaluation of Foster Youth Programs. We acknowledge that states will vary in their approach to administering the NYTD Youth Outcome Survey. However, in 11 different state site visits conducted to evaluate state implementation of the NYTD survey since FY 2012, we have determined that our burden estimates are realistic and reflective of the level of effort states typically devote to NYTD outcomes data collection. Consequently, we are not changing our burden estimates for the Youth Outcome Survey or the related estimates for tracking young adults allocated to the Data File instrument burden.

Two commenters provided feedback regarding the amount of CFCIP funds provided to support youth services and the amount of CFCIP funds subject to penalty for non-compliance with NYTD requirements. One commenter, for example, suggested ACF should provide additional funding to support the provision of monetary incentives to encourage youth to participate in the NYTD survey. While we recognize the utility of incentives to maximize participation in a survey effort with this population, we do not have the authority to provide more than the annually appropriated funding for the CFCIP. However, as we have stated in prior guidance, states may use their own CFCIP funds to provide small incentives to youth provided that the state follows OMB's "Guidance on Agency Survey and

Statistical Information Collections.” While this guidance is directed to federal agencies, the same general principles should guide state agencies, as well.

Finally, one commenter recommended that ACF not penalize states for non-compliance as these financial penalties impact the funds that could be used for youth services. The statute that authorized NYTD requires us to assess a penalty against states that fail to comply with our data collection requirements. The funds subject to penalty are the CFCIP funds allocated or reallocated to the state agency under section 477(c)(1) of the Social Security Act for the federal fiscal year that corresponds with the reporting period for which the state agency was required originally to submit data. We crafted the penalty structure carefully within the statutory parameters with the goal of obtaining quality data that can be used to understand services and improve youth outcomes. Because the penalty structure is based in statute and implemented in regulation, it is beyond the scope of consideration for this information collection activity comment request.

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

No payments, other than CFCIP funds and federal financial participation for the maintenance and development of child welfare information systems are made to states for NYTD data collection efforts. As noted in Item #8, states are permitted and encouraged to use CFCIP funds to provide small incentives to youth to encourage participation in the NYTD Youth Outcome Survey.

#### 10. Assurance of Confidentiality Provided to Respondents

The NYTD regulation requires states to use an encrypted personal identification number so the identity of the individual youth remains confidential to anyone other than the state. We also encourage states to implement an informed consent protocol that assures survey participants that their personal data is protected and kept confidential (see (NYTD Technical Assistance Brief #5: Designing an Informed Consent Form for Use with the Youth Outcome Survey”).

#### 11. Justification for Sensitive Questions

Congress specifically required in law that states collect outcome information on issues of a sensitive nature including rates of non-marital childbirth, incarceration and high risk behaviors. Therefore, we require states to pose questions in the youth survey that ask about these areas of a youth’s life. The survey is voluntary and, as noted in Item #10, we expect states to obtain youth or parental consent, as appropriate. We also have provided technical assistance to states regarding the design and implementation of an appropriate survey methodology such as in the attached document “Practical Strategies for Planning and Conducting the National Youth in Transition Database (NYTD) Youth Outcome Survey.”

## 12. Estimates of Annualized Burden Hours and Costs

This information collection will be comprised of:

- 1) **Data File:** The state’s submission to ACF of two (2) semi-annual data files that contain information on all data elements regarding youth services, demographics, characteristics and outcomes; and,
- 2) **Youth Outcome Survey.** A survey composed of 22 questions on youth outcomes (that correspond with 22 data elements in the first instrument) to be completed by youth in the baseline (17-year-olds in foster care) and follow-up populations (19- and 21-year-old youth who participated in the survey at age 17).

### Annual Burden Hour Estimates for the NYTD, FY 2016 – FY 2018

The following are burden hour estimates for FY2016, FY2017, and FY2018. Please note that the average annualized burden estimates (covering all three years of this information collection request) are detailed in the table labeled “Annualized burden estimates for the NYTD for the three-year period corresponding to this ICR, FY 2016 – FY 2018” on page 9 of this document.

- 1) **FY 2016:** With regard to the **Data File** instrument, we estimate that there will be approximately 1,924 youth who receive services annually per state. Each state will expend on average 30 minutes (0.5 hours) to collect the services, demographics and characteristics information from those youth resulting in an hour burden of 962 per state each report period. In FY 2016, states will collect outcomes information on the follow-up population of 19-year-olds in NYTD Cohort 2. The age 19 follow-up population is a subset of the NYTD baseline population as it includes only youth who participated timely in the survey at age 17. Pursuant to the NYTD regulation, some States may also opt to collect outcomes information on a sample of 19-year-olds instead of the complete follow-up population. For these reasons, our estimate for the age 19 follow-up population (16,000 nationally or 208 per state; with states surveying about half of this number each report period during FY 2016) will be much smaller than our estimate for the original age 17 baseline population. We are estimating 45 minutes (0.75 hours) for states to explain the purpose of the survey to the youth and to record the outcomes information that will be reported in the data file. This results in a burden estimate of 116 hours per state per report period (“per response”). In addition, we are estimating tracking burden during this year as we expect most 19-year-olds to have exited foster care. Based on previous studies involving locating hard to reach youth populations (Meyers, 2002) and estimates from the Multisite Evaluation of Foster Youth Programs, we are estimating states making up to 12 contacts in FY 2016 to locate and engage a 19-year-old youth in the NYTD survey. Estimating 10 minutes per contact, we anticipate two burden hours for tracking 19-

year-old youth in FY 2016 or 308 burden hours per state per report period. That total burden hour estimate for the Data File instrument is 1,386 hours per response. With regard to the **Youth Outcome Survey** instrument, we are estimating 0.5 burden hours for each youth to listen to the state’s survey instructions and to provide responses to the survey questions, resulting in a total of 8,000 burden hours.

FY2016

<i>Instruments</i>	<i>Number of respondents</i>	<i>Number of responses per respondent</i>	<i>Average burden per response (hrs)</i>	<i>Total burden hours (hrs)</i>
<b>1. Data File</b>	<b>52</b>	<b>2</b>	<b>1,386</b>	<b>144,144</b>
<i>Services</i>			962	100,048
<i>Outcomes</i>			116	12,064
<i>Tracking</i>			308	32,302
<b>2. Youth Outcome Survey</b>	<b>16,000</b>	<b>1</b>	<b>0.5</b>	<b>8,000</b>
<b>TOTAL burden for both</b>				<b>152,414</b>
<b>collections</b>				

- 2) FY 2017: With regard to the **Data File** instrument, we have estimated the same 962 hour burden per state per report period associated with collecting and reporting youth independent living services, demographics and characteristics information. In FY 2017, states will begin surveying a new cohort of youth starting with outcomes data collection for on another baseline population of 17-year-olds in foster care (Cohort 3). We are estimating 45 minutes (0.75 hours) for states to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. We estimate that there will be on average 577 17-year-old youth in foster care per state in FY 2017, resulting in approximately 216 burden hours to record this information each report period (assuming that states survey half of the baseline population of 17-year-olds in each of the two semi-annual reporting periods in FY 2017). We are not estimating tracking burden during this year for the baseline population as we expect states to know the whereabouts of the 17-years-olds still in foster care. However, we are estimating tracking burden during FY 2017 for the follow-up population as we expect states to maintain contact with this population between survey rounds at ages 19 and 21. In the intervening year between survey rounds, we estimate that states will make three contacts in FY 2017 to maintain a current address and contact information for such youth in each state’s NYTD follow-up population or follow-up population sample (308 youth per state on average). Estimating 10 minutes per contact, we anticipate 0.5 burden hours for tracking 19-year-old youth in FY 2017 or 77 burden hours per state per report period. The burden estimate for the Data File instrument is 1,255 hours per response. With regard to the **Youth Outcome Survey** instrument, we are estimating that it will take the estimated 30,000 youth nationwide approximately 30 minutes (0.5 hours) to complete the survey, resulting in a total of 15,000 burden hours.

FFY 2017



<i>Instruments</i>	<i>Number of respondents</i>	<i>Number of responses per respondent</i>	<i>Average burden per response (hrs)</i>	<i>Total burden hours (hrs)</i>
<b>1. Data File</b>	<b>52</b>	<b>2</b>	<b>1,255</b>	<b>130,520</b>
<i>Services</i>			962	100,048
<i>Outcomes</i>			216	22,464
<i>Tracking</i>			77	8,008
<b>2. Youth Outcome Survey</b>	<b>30,000</b>	<b>1</b>	<b>0.5</b>	<b>15,000</b>
<b>TOTAL burden for both collections</b>				<b>145,520</b>

3) FY 2018: With regard to the **Data File** instrument, we have estimated the same 962 hour burden per state per report period associated with collecting and reporting youth independent living services, demographics and characteristics information. In FY 2018, states will collect outcomes information on the Cohort 2 follow-up population of 21-year-olds. We are using the same estimate we used for this same population at age 19 (16,000 nationally or 308 per state; with states surveying about half of this number each report period during FY 2018). We are estimating 45 minutes (0.75 hours) for states to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. This results in a burden estimate of 116 hours per state per report period. In addition, we are estimating tracking burden during this year as we expect most 21-year-olds in Cohort 2 to have exited foster care. We are estimating states making 10-12 contacts in FY 2018 to locate and engage 21-year-old youth in the NYTD survey. Estimating 10 minutes per contact, we anticipate two burden hours for tracking 21-year-old youth in FY 2018 or 308 burden hours per state per report period. Similarly, we are estimating tracking burden during FY 2018 for Cohort 3 youth (surveyed in FY 2017 at age 17) as we expect states to maintain contact with this population between survey rounds at ages 17 and 19. In the intervening year between survey rounds, we estimate that states will make three contacts in FY 2018 to maintain a current address and contact information for such youth (once again, using 308 youth per state as an estimate). Estimating 10 minutes per contact, we anticipate 0.5 burden hours for tracking 18-year-old youth in FY 2018 or 77 burden hours per state per report period. The total burden hour estimate for the Data File instrument is 1,463 per response. With regard to the **Youth Outcome Survey** instrument, we are estimating 0.5 burden hours for each youth to listen to the state’s survey instructions and to provide responses to the survey questions, resulting in a total of 8,000 burden hours.

**FFY 2018**

<i>Instruments</i>	<i>Number of respondents</i>	<i>Number of responses per respondent</i>	<i>Average burden per response (hrs)</i>	<i>Total burden hours (hrs)</i>
<b>1. Data File</b>	<b>52</b>	<b>2</b>	<b>1,463</b>	<b>152,152</b>
<i>Services</i>			962	100,048
<i>Outcomes</i>			116	12,064
<i>Tracking</i>			385	40,040
<b>2. Youth Outcome Survey</b>	<b>16,000</b>	<b>1</b>	<b>0.5</b>	<b>8,000</b>

<b>TOTAL burden for both collections</b>	<b>160,152</b>
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**Annualized burden estimates for the NYTD for the three-year period corresponding to this ICR, FY 2016 – 2018**

<i>Instruments</i>	<i>Number of respondents</i>	<i>Number of responses per respondent</i>	<i>Average burden per response (hrs)</i>	<i>Total burden hours (hrs)</i>
<b>1. Data File</b>	<b>52</b>	<b>2</b>	<b>1,368</b>	<b>142,272</b>
<b>2. Youth Outcome Survey</b>	<b>20,667</b>	<b>1</b>	<b>0.5</b>	<b>10,334</b>
<b>TOTAL annualized burden estimate for both collections</b>				<b>152,606</b>

Annualized Cost Estimates for the NYTD, FY 2016 – FY 2018

Using \$34.00 per hour as an approximation for state worker hourly wages (Bureau of Labor Statistics, 2014) the costs associated with gathering the Youth Outcome Survey information and preparing and submitting the NYTD Data File would be \$94,248 per state in FY 2016 (1,386 burden hours per response x 2 responses per year x \$34.00 hourly wage), \$85,340 per state in FY 2017 (1,255 burden hours per response x 2 responses per year x \$34.00 hourly wage) and \$99,484 per state in FY 2018 (1,463 burden hours per response x 2 responses per year x \$34.00 hourly wage). We are not estimating any costs to the youth who participate voluntarily in the NYTD Youth Outcome Survey during FY 2016-2018.

**Annualized cost estimates for the NYTD for the 3-year period corresponding to this ICR, FY 2016 – 2018**

<i>Instruments (subcomponents)</i>	<i>Total cost</i>
<b>1. Data File</b>	<b>\$279,072</b>
<i>FY 2013</i>	\$94,248
<i>FY 2014</i>	\$85,340
<i>FY 2015</i>	\$99,484
<b>2. Youth Outcome Survey</b>	<b>\$0</b>
<i>FY 2013</i>	\$0
<i>FY 2014</i>	\$0
<i>FY 2015</i>	\$0

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

We expect that on average business process costs, travel and training, process development, information technology (IT) operational and maintenance costs will be approximately \$250,000 per state per year. Because many of these costs can be matched at 50% Federal financial participation for a state that has a SACWIS, we are estimating a cost burden of \$125,000 per state per year (or \$62,500 for each of the two responses per year). We do not expect that reporting for NYTD will require the purchase of additional hardware or other capital equipment. For IT system changes, the main costs are in software development and/or modification. We characterize these costs as minor, but we are aware of the impact

the cost of implementation has on states. During the rule-making process, we received comments from states regarding anticipated start-up and annual costs that indicated our estimates are accurate. We are not estimating any other cost burden associated with the Youth Outcome Survey instrument because we are not estimating any costs to respondent youth and because costs associated with a State collecting survey data is captured as part of other IT system development costs in the Data File instrument (as shown below).

**Estimates of other total annual cost burden for reporting for the 3-year period corresponding to this ICR, FY 2016 – FY 2018**

<i>Instruments</i>	<i>Cost per response</i>	<i>Responses per year</i>	<i>Number of respondents</i>	<i>Total cost burden for reporting</i>
<b>1. Data File</b>	<b>\$62,500*</b>	<b>2</b>	<b>52</b>	<b>\$6,500,000</b>
<b>2. Youth Outcome Survey</b>	<b>\$0</b>	<b>1</b>	<b>20,667</b>	<b>\$0</b>

We recognize that the reporting and recordkeeping burden is disproportionately higher for small states because they need to develop the same functionality as large states regardless of the number of youth reported. State costs are not affected by the number of youth in the reporting population or the number of reporting periods. We also recognize that county-administered states may face more challenges in implementation, but see no need to change our cost burden estimates. Each state will have different costs depending on their populations of youth and the changes required in their information systems and business procedures to meet the requirements in the regulation.

14. Annualized Cost to the Federal Government

A federal NYTD system was developed and implemented in 2011 to receive, process and store NYTD data submitted by states. The costs to operate, upgrade, maintain and secure the federal NYTD system in the ACF network environment is estimated at \$270,000 per year (\$250,000 to host and maintain the system and another \$20,000 to maintain the system’s cybersecurity posture necessary to maintain its federal authority to operate (ATO)). In addition, approximately \$180,000 is spent on contractor support to operate the NYTD help desk and provide technical support to the Children’s Bureau to resolve any technical problems with the NYTD system. In total, the annualized cost to the federal government is \$450,000.

15. Explanation for Program Changes or Adjustments

We are not proposing any material changes in the collection instruments, instructions, or the uses of the information collection currently approved by OMB. While we are making no changes to the amount of burden time per response, as we noted in Item 12 above there is an adjustment in our agency’s estimate related to the total **Data File** burden (to account for our new estimates in the number of youth states must track and locate for the NYTD survey) and

to the total **Youth Outcome Survey** burden (again, to account for new estimates to the size of our national reporting population). We did not account for these estimates in our initial approved collection because the required data collection schedule for NYTD is staggered and tracking and surveying youth in the second and third survey waves had not yet begun. Based on these adjustments, we are increasing the estimate of annual responses to the NYTD Youth Outcome Survey from 15,334 to 20,677 due to the increase in the size of the respondent pool and increasing our total annualized burden hour estimate from 132,571 hours to 152,606 hours.

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

We make annual NYTD data reports available on the Children's Bureau website at <http://www.acf.hhs.gov/programs/cb/resource/data-briefs>. We generally issue these reports in October following the fiscal year that is the subject of the data brief. The purpose for this lag time is to allow states the option to resubmit corrected/updated data from the prior year as allowed in 45 CFR 1356.85(e)(1). NYTD data sets also are publically available to researchers at our National Archive on Child Abuse and Neglect (NDACAN) at <http://www.ndacan.cornell.edu/>.

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

As in prior information collection requests, we are requesting that the OMB number and expiration date not be displayed for the NYTD Data File as these files will be transmitted electronically to ACF. (Please note that we do currently post the OMB number and expiration date on the web portal states use to submit the NYTD file). We also request that the OMB number and expiration date not be displayed on the NYTD Youth Outcome Survey. While we chose to regulate the survey questions and response options in the Youth Outcome Survey, there is no specified form or format in which states must administer the survey to youth.

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

There are no exceptions to the certification statement.