

Permanency Innovations Initiative: Phase 4

**OMB Information Collection Request
0970 - 0408**

Supporting Statement

Part A

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Submitted By:
Office of Planning, Research and Evaluation
Administration for Children and Families
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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 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 (OPRE) is overseeing the evaluation component of the PII.

The PII Evaluation includes multiple components:

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

OMB has approved information collection activities for the cross-site implementation study, cost study, and administrative data study and four site-specific impact evaluations. This current request is for another site-specific impact evaluation.

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

The 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;
- Cost study; and
- Administrative data study.

Cross-site implementation study. The implementation study is documenting the status of grantees' implementation of their planned interventions and addresses 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. Data collection 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). OMB approved data collection instruments for a third site-specific impact evaluation (Illinois DCFS) and the ORB component of the Los Angeles Gay and Lesbian Center's RISE project in August 2013 (OMB #0970-0408).

OMB approved data collection instruments for the second component of the care coordination team (CCT) and modifications to existing instruments and the addition of a new instrument for the outreach and relationship building (ORB) components of the RISE project in July 2014 (OMB #0970-0408).

The current package is seeking approval for data collection related to California Department of Social Services' (DSS) California Partnership for Permanency (CAPP) site-specific impact evaluation.

Cost study. The PII cost study involves the collection of program costs through staff activity logs, focus groups, and a review of existing documentation (such as grantee expenditure reports). The available information allows for categorization of the first-level of program costs, namely line-item expenditures, including personnel, space, utilities, travel, and supplies. Additional information is required for the second-level categorization, which will comprise the components of personnel (labor) costs, typically the largest proportion of program costs. For personnel costs, we will distinguish various types of program staff activities, such as direct client services and project management and administration activities. OMB approved data collection for this study in July 2014 (OMB #0970-0408).

Administrative data study. State administrative data will serve as the key source of information on the long-term outcomes of importance to PII (e.g., permanency-related outcomes). These data will be used to determine whether interventions help improve permanency-related outcomes for youth in PII intervention groups as compared to youth in the comparison or 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 package for this study was approved in July 2014 (OMB #0970-0408).

This information collection request is the fourth information collection request package submitted to cover different phases and components of the PII project.

Research Questions

The overarching research question for PII 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 they implemented. Thus, each site has unique research questions and sets of proximal outcomes hypothesized to lead to the common permanency outcome(s). Data collection instruments for each site-specific evaluation are tailored to the research questions and proximal outcomes being measured (see below for more details on the research questions pertinent to the sites we are requesting approval for in this current OMB package). See Attachment A1 for a matrix outlining instruments and research questions for previously-approved PII sites, and Attachment A2 for a matrix covering the instruments and research questions in the present package (CAPP). Below, only the research questions related to the current information clearance request are discussed.

CAPP's initiative, known as the "CAPP Child and Family Practice Model" addresses all children in or entering foster care at elevated risk of a non-permanent exit (e.g., aging out) or long-term

foster care, with a targeted effort to help children who are in care the longest and experience the worst outcomes. According to statewide data, these sub-populations include children of African American and American Indian heritage. The main research questions related to the current information clearance request are as follows:

(1) After children begin receiving services from caseworkers trained in the CAPP Model frontline practices, do rates increase for total casework contacts, newly involved individuals (collateral contacts), visitations supervised by DSS staff members, and permanency team meetings? Are differences indicated for African American/Black and American Indian (AA/AI) children compared to non-AA/AI children?

(2) Are opinions of parent-legal guardians and caregivers consistent with the intent of the CAPP Model with regard to relationship with their social worker, connectedness to their child’s circle of support¹, the circle of support’s involvement in case planning and problem solving, and the participant’s sense of hopefulness and locus of control? What are parent-legal guardian and caregiver recollections of casework events with family, friends, community members, and tribal representatives? Are differences indicated for parent-legal guardians and caregivers of AA/AI (P) compared to non-AA/AI children?

Questions 1 and 2 will be answered through the use of the client surveys. Please see the ***Current Request for Data Collection Instruments section*** for more details on the client surveys.

The CAPP instrumentation was pretested as approved under the ACF/OPRE generic clearance, Pre-testing of Evaluation Surveys in September 2013. The generic clearance has a current expiration date of March 2018.

The current parent/legal guardian and caregiver surveys were subjected to cognitive testing in February 2015. Seventeen 60-90 minute in-person interviews were conducted in Fresno, California. Eight parents and nine foster caregivers participated in the cognitive testing. Nearly all of the respondents were female (94%). Most respondents identified as Hispanic (59%) or African-American (35%). Only one respondent identified as Native American (.06%). Fourteen respondents (82%) spoke English. The survey overall was easy for most respondents to read, understand and answer. Only three respondents answered the Spanish version of the survey. They were also interviewed in Spanish and none reported any language specific issues. Below is a summary of the recommended changes to the surveys.

Item	Results of Pretesting
Survey & Section A Introduction	We will add a sticker with the name of the child and social worker to the parent version, as well, if possible.
Q6-7	We will leave the questions as is, but anticipate that some respondents will not have a clear conceptualization of what their cultural values and traditions are. We will be aware of potential measurement error in the “not at all” category, which some respondents may use to convey that they do not have cultural values and traditions, rather than that the social worker did not try to learn about or respect their cultural values.

¹ Circle of support is defined as the individuals that make up the child’s support network.

Q12/13	We have added a column for “NA” and reformatted the matrix as IDEA Services suggested in our expert review.
Section C Introduction	We removed an instruction to think of the social worker.
Q29 List of Community/Tribal Representatives (Parent Version)	We reformatted the list to add “church” as an easily recognizable category and added “community” to the header so that respondents are not limited by the term “tribal” alone. We moved the number “29” next to the list so that those skipping from question 26 are more likely to see it.
Q35-37 (Parent Version)	We added a third response option “I have not been cleared for visitation with my child(ren)” to Q35-37 in the parent version.

Study Design

The CAPP Model aims to change front-line practices that inform all interaction with children and families, and to develop an organizational and system infrastructure capacity to support the changes in front-line practices. The front-line practice behaviors are a mix of intended, culturally-sensitive changes in casework interactions with children, families, community members, and stakeholders. Although the CAPP Model specifically aims to improve permanency outcomes for children of African American and American Indian heritage, all children and their parents served by a CAPP-trained caseworker receive the CAPP intervention. The CAPP Model is being implemented in Fresno, Humboldt and Santa Clara counties, and the Los Angeles County Offices of Pomona and Wateridge.

The CAPP evaluation will utilize a comparison group design. We anticipate that 1673 parent-legal guardians and 1763 caregivers will complete questionnaires that will inform whether proximal outcomes of the intervention are being achieved. Proximal outcomes include the respondent’s relationship with their social worker, their sense of hopefulness and locus of control; family, friend, community, and tribal member involvement in the child’s case; and the occurrence of specific casework events. The responses of parent-legal guardians and caregivers of African-American and American Indian children will be compared to parent-legal guardians and caregivers of children of other ethnic backgrounds.

Using administrative data, the permanency outcomes of those children in out-of-home care who participate in the CAPP model will be compared to a matched sample of children served within the sites during a pre-implementation (historical) period. This analysis will take place as part of the cross-site administrative data study, which received OMB approval on July 3, 2014.

Universe of Data Collection Efforts:

Previously Approved Data Collection Instruments

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

Current Request for Data Collection Instruments

The data collection activities for the CAPP evaluation include self-administered questionnaires with parent-legal guardians and caregivers. Eligible study participants include parent-legal guardians or foster caregivers of children who are assigned to social workers trained to implement the CAPP Child and Family Practice Model; have been part of cases served by a CAPP-trained social worker for 90 days or more; can speak and read English or Spanish; and are age 18 or older. Parent-legal guardians are in Family Reunification (FR) status, where a child in foster care and the parents from whom the child was removed are receiving services to reunify as a family. Caregivers are foster care providers caring for children in Permanent Placement (PP) status, where the child in foster care is not expected to reunify with a parent or parent or legal guardian, and services are targeted toward their status in foster care and achieving adoption, guardianship or another planned permanent living arrangement. See Attachment A2 for the CAPP Research Matrix, a crosswalk of CAPP research design, instruments, burden hours, and research questions.

Parent-Legal Guardian Questionnaire: The parent-legal guardian questionnaire was first used in a pilot study with parents and legal guardians in Fresno County in 2013 as approved under the ACF/OPRE generic clearance, Pre-testing of Evaluation Surveys (OMB Number 0970-0355). The evaluation team revised the questionnaire after the pilot study ended in December 2013, and then again after further cognitive testing in February 2015. This questionnaire includes questions about the parent-legal guardian's relationship with their social worker; their sense of hopefulness and locus of control; family, friend, community, and tribal member involvement in the child's case; the occurrence of casework events; and general demographics on the participant and their child. Parent-legal guardian survey participants will be instructed in the survey to consider their oldest or youngest child in child welfare services and that child's social worker when answering the questions. The questionnaire has gone through a series of reviews and edits based on feedback from multiple survey design experts and the CAPP advisory team, which includes California county, community and tribal representatives. The duration of survey administration, including reading and signing the informed consent, is expected to take approximately 36 minutes. Please see Attachment A3a: Parent-Legal Guardian Informed Consent and Questionnaire Paper 8-15.

Caregiver Questionnaire: The caregiver questionnaire is a modified version of the parent-legal guardian questionnaire. This questionnaire was subjected to cognitive testing in February 2015 as approved in September 2013 under the ACF/OPRE generic clearance, Pre-testing of Evaluation Surveys (0970-0355). Revisions were made to this instrument after cognitive testing. Questions address a caregiver's relationship with their social worker; their sense of hopefulness and locus of control; family, friend, community and tribal member involvement in the child's case; the occurrence of casework events; and general demographics on the participant and the child. The duration of survey administration, including reading and signing the informed consent, is expected to take approximately 36 minutes. Please see Attachment A4a: Caregiver Informed Consent and Questionnaire Paper 8-15.

Both the parent-legal guardian and caregiver surveys and their informed consent forms have been translated into Spanish by expert translators at Westat. See Attachment A3b: Parent-Legal

Guardian Informed Consent and Questionnaire Paper Spanish 8-15 and Attachment A4b: Caregiver Informed Consent and Questionnaire Paper Spanish 8-15.

All survey packets include a pre-addressed, postage paid envelope to send the questionnaire back in the mail. Westat provides a toll-free 1-800 number on the informed consent in the survey packet for questions and assistance completing the survey or to take the survey by telephone. Should a participant call with questions or a request for assistance, Westat will document and answer their questions and offer to administer the questionnaire over the telephone. See Attachment A5a: Parent-Legal Guardian Informed Consent and Questionnaire Telephone 8-15, Attachment A6a: Caregiver Informed Consent and Questionnaire Telephone 8-15, Attachment A5b: Parent-Legal Guardian Informed Consent and Questionnaire Telephone Spanish 8-15, and Attachment A6b: Caregiver Informed Consent and Questionnaire Telephone Spanish 8-15.

Future Information Collection Requests

At this time, we do not anticipate having to submit any additional PII OMB information collection requests.

A3. Improved Information Technology to Reduce Burden

Electronic data collection is not planned for the CAPP survey because it would likely yield low response rates as a substantial portion of respondents may not have a computer, or it would be additional burden for them to find one through a library, friend's computer, etc. The CAPP instruments will be self-administered using paper and pencil. All survey packets include a pre-addressed, postage paid envelope to send the questionnaire back in the mail. Westat provides a toll-free 800-number on the informed consent in the survey packet for questions and assistance completing the survey or to take the survey by telephone.

A4. Efforts to Identify Duplication

None of the proposed instruments for the CAPP evaluation 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. 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 use 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 questionnaires for the CAPP evaluation are administered one-time only. The information collected will be sufficient to answer the question of whether the opinions of parent-legal

guardians and caregivers are consistent with the intent of the CAPP model and whether there are differences indicated for parent-legal guardians and caregivers of African-American and American Indian children compared to parent-legal guardians and caregivers of children of other ethnic backgrounds.

A7. Special Circumstances

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

A8. Federal Register Notice and Consultation

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 December 18, 2014, Volume 79, Number 243, page 75556, and provided a sixty-day period for public comment. A copy of Federal Register notices is attached (see Attachment A7). We did not receive any comments during the notice and comment period.

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

The evaluation will provide a token of appreciation to respondents for participating in the site-specific grantee evaluations. 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. Each CAPP survey participant will receive a \$50.00 Visa gift card as a token of appreciation. This amount is higher than what the evaluation team has offered survey respondents in other PII sites. The evaluation team decided to offer \$50 for CAPP survey participants after consultation with the CAPP grantee about the average amount of money provided to DSS-related survey participants in California. This typically ranges from \$50 (for example, in the recent California Youth Transitions to Adulthood Study (CalYOUTH)) to \$100 (the current incentive amount for the National Youth in Transition (NYTD) survey in California). Westat will mail the token of appreciation to each paper-and-pencil survey participant at the contact address they list on the informed consent form upon receipt of the survey. Westat will mail the token of appreciation to each telephone survey participant at the contact address they provide as part of the verbal informed consent process.

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 participation is voluntary, and their information will be private to the extent permitted by law and securely stored. Please note that CAPP's informed consent includes the Participant's Bill of Rights for Non-Medical Research. This document is mandated by the Committee for the Protection of Human Subjects (CAPP's IRB) and further documents respondent's rights in the research projects.
- Respondents are assured that, without risk of penalty, they may discontinue participating or choose not to participate in an interview or group discussion or answer certain questions at any point.
- 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, and names of respondents will not appear in any report.

All data transmissions are over secure channels. All electronic content is stored on secure servers. The data and analysis servers can be accessed only by specific staff over channels secured through two-factor authentication. Study data will be reported and presented only at an aggregate level that protects individual privacy.

The Office of Planning, Research and Evaluation is working with our Office of Information Services to create and publish a Privacy Impact Assessment (PIA) to ensure that information handling conforms with applicable legal, regulatory, and policy requirements regarding privacy; determine the risks of collecting and maintaining PII; assists in identifying protections and alternative processes for handling PII to mitigate potential privacy risks; and communicates an information system's privacy practices to the public. This PIA, titled ACF Research and Evaluation Studies, will be available online through the Department of Health and Human Services.

A11. Sensitive Questions

Survey questions were written to cause minimal or no discomfort. Nonetheless, the consent form does indicate that if any questions make the respondent feel upset or sad, they can choose to skip these questions. Respondents are also advised to talk with their social worker to discuss any feelings that may surface as a result of their participation in the survey. For those respondents who participate in the survey by telephone, the interviewer will remind them of these options.

An earlier version of the parent-legal guardian survey was administered by telephone in a pilot study conducted in May-June 2013. Westat did not experience any instances where participants became upset or uncomfortable.

A12. Estimation of Information Collection Burden

Previously Approved Information Collections

We have used 2,185 hours (29%) of the previously approved 7,602 hours. The evaluation team will continue to collect information with these previously approved instruments, as described in approved information collection requests. Remaining burden is outlined 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	11	7
Implementation Drivers Web Survey	240	118	122
Grantee Case Study Protocol	240	117	123
Fidelity Data (Implementation Quotient Tracker)	24	16	8
<i>Cross-Site Estimated Total</i>	<i>522</i>	<i>262</i>	<i>260</i>
KANSAS:			
Caregiver Initial Information Form	30	25	5
Family Assessment Battery	900	672	228
CAFAS/PECFAS	630	233	397
Caseworker discussions for NCFAS-G&R completion	315	233	82
<i>Kansas Estimated Total</i>	<i>1875</i>	<i>1163</i>	<i>712</i>
WASHOE COUNTY:			
Family Assessment Battery	525	370	155
<i>Washoe Estimated Total</i>	<i>525</i>	<i>370</i>	<i>155</i>
ILLINOIS DCFS:			
DCFS Biological Parent Study Contact Form	17	3	14
DCFS Biological Parent Interview	86	12	74
DCFS Youth and Foster Parent Study Contact Form	23	3	20
DCFS Foster Parent Interview	342	117	225

Table A1. Previously Approved Information Collections Approved Hours and Hours Remaining			
Instrument	Previously Approved Annual Burden Hours	Hours Used	Annual Burden Hours Remaining
DCFS Youth Interview	342	342	204
<i>Illinois DCFS Estimated Total</i>	<i>810</i>	<i>273</i>	<i>537</i>
RISE ORB:			
RISE Staff Pre-Test (B9a: revised)	39	39	0
RISE Staff Post-Test (B9b: revised)	39	35	4
Staff Follow-Up Survey	47	3	44
<i>RISE ORB Estimated Total</i>	<i>125</i>	<i>77</i>	<i>48</i>
RISE CCT:			
Youth Interview (ages 11-19) ¹	44	3	41
Youth Qualitative Interview (ages 11-19)	22	3	19
CCT Facilitator Interview (facilitator burden) ¹	2	1	1
CCT Facilitator Interview (child burden) ¹	3	0	3
CCT Facilitator Survey	8	0	8
Facilitator submission of CAFAS data ²	4	0	4
Permanency Resource Interview ³	22	5	17
Current Caregiver Interview ⁴	13	0	13
<i>RISE CCT Estimated Total</i>	<i>118</i>	<i>12</i>	<i>106</i>
COST STUDY:			
Cost Study Focus Group Preparation	14	7	7
Cost Focus Group Guide	36	17	19
Trial Administration of Logs	14	0	14
Weekly Casework Activity Log	2558	0	2558
Weekly Supervision Activity Log	811	0	811
Monthly Management/Administration Log	180	0	180
<i>Cost Study Estimated Total</i>	<i>3613</i>	<i>24</i>	<i>3589</i>
ADMINISTRATIVE DATA STUDY:			
Data file submission, no added fields	4	1	3
Data file submission with added fields	10	3	7
<i>Administrative Data Estimated Total</i>	<i>14</i>	<i>4</i>	<i>10</i>

¹The CCT facilitators, rather than the data collector, conduct these interviews due to the young ages of the children in the intervention group. These interviews are conducted only with children, ages 5-10, in the intervention group. Total n = 8. The same instrument are administered twice. There is no annual cost for the child's burden, because the child is younger than 18.

²The CAFAS is administered as part of case planning, so the only burden is in submitting the CAFAS data to the evaluation team.

³The interviews with permanency resources are conducted with permanency resources only for youth in the treatment group (ages 11-19), not in the comparison group. It is not possible to verify that interviewing permanency resources would be safe for youth in the comparison group.

⁴The interviews with current caregivers are conducted with current caregivers only for youth in the treatment group (ages 11-19), not in the comparison group. It is not possible to determine that interviewing current caregivers would be safe for youth in the comparison group.

Newly Requested Information Collections

Table A.2 contains the estimated annual burden hours and annual cost for each type of respondent for this new information collection request. The total annual burden for this new request is expected to be 688 hours.

Table A2. Total Burden Requested Under this Information Collection							
Instrument	TOTAL Number of Respondents	Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	ANNUAL Burden Hours	Median Hourly Wage	Total Annual Cost
CAPP Parent-Legal Guardian Questionnaire	1673	558	1	.6	335	17.38	5822.30
CAPP Caregiver Questionnaire	1763	587	1	.6	352	17.38	6135.14
Estimated Annual Burden Total					687	--	11957.44

Total Burden

This request is for three years of information collection. The total annual burden under OMB #0970-0408 will be 5,417 annual hours remaining for previously approved instruments (Table A1) in addition to 687 annual hours for instruments under review in this request. **This is a total of 6,104 annual burden hours under OMB #0970-0408.**

Total Annual Cost

To compute the total estimated annual cost, the total burden hours were multiplied by the median hourly wage for each adult participant. The specific median hourly wages were as follows: \$17.38² for parents/legal guardians/caregivers.

A13. Cost Burden to Respondents or Record Keepers

² Median all-occupation hourly wage is from Bureau of Labor Statistics, Occupational Employment Statistics (\$16.87 in 2013, increased 3% for 2015). http://www.bls.gov/oes/current/oes_nat.htm

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 \$343,818 for the CAPP field worker data collection costs. This total estimate combines the hourly base rate and SCA fringe with field staff overhead. Annual costs to the Federal government will be 1.8 million annually for all proposed data collection activities under OMB #0970-0408. This includes direct and indirect costs of data collection.

A15. Change in Burden

This is a request for additional data collection under 0970-0408. Previously approved burden was updated to reflect completed data collection.

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

Analysis Plan

Site-specific Impact Evaluations

Each PII 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. The primary distal 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 intervention and comparison groups of children. This type of data is censored because at the 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. Also it is likely that other outcomes such as reentry to foster care will be censored to the duration of each study. The permanency outcomes of intervention and comparison groups will be analyzed and compared using techniques appropriate to censored 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.

Because each PII grantee intervention has a unique target population and study selection criteria, study subjects must be matched to a non-study comparison group on a per-intervention basis. Thus, each PII grantee intervention will have an associated comparison group. These comparison groups will be selected from non-study AFCARS, NCANDS, and SACWIS cases using a balanced match on characteristics that, at the moment of entry into the study, would strongly predict the same outcome as a study subject in the absence of the PII intervention. 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.

Task	First Package (PII1)			Second Package (PII2)		Third Package (PII3)			Fourth Package (PII4)*
	Implement-ation Study	Kansas	Washoe	IL DCFS	RISE ORB	RISE CCT	Adminis-trative Data Study	Cost Study	CAPP
Data Collection, Data Cleaning, and Quality Assurance	9/1/12 - 5/31/15			8/1/13 - 10/31/15	8/1/13 - 5/31/15	7/3/14-10/31/15	7/3/14-8/31/16	7/3/14 - 1/31/16	Upon OMB approval - end date of data collection 4/30/16
Create Analysis Files	1/1/15 - 5/31/15	4/1/15 - 8/31/16				11/1/15 - 1/31/16	11/1/15-2/15/16	4/1/15 - 2/28/16	Upon OMB approval - 4/30/16
Data Analysis	4/15 - 4/16							10/15-4/16	5/16 - 6/16
Draft Report	7/15-4/16							5/30/16	8/30/16
Final Report	10/15-5/16							6/30/16	9/30/16

*Current information collection request

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.

