



**U.S. Department of Justice**

Office of Justice Programs

*Bureau of Justice Statistics*

---

*Washington, D.C. 20531*

**MEMORANDUM**

To: Jennifer E. Park  
Office of Statistical and Science Policy  
Office of Management and Budget

Through: Lynn Murray  
Department Clearance Officer  
Justice Management Division

Jeri M. Mulrow  
Acting Director  
Bureau of Justice Statistics

From: Jessica Stroop  
Statistician, Project Manager

Allen Beck, Ph.D.  
Senior Statistical Advisor  
Bureau of Justice Statistics

Date: November 17, 2016

Re: BJS Request for OMB Clearance for Pilot Testing the National Survey of Youth in Custody (NSYC-3) under the BJS Generic Clearance Agreement (OMB# 1121-0339)

**Introduction**

The Bureau of Justice Statistics (BJS) seeks generic clearance approval for pilot testing activities related to the National Survey of Youth in Custody (NSYC). The NSYC supports a statistical collection mandated by Congress (Public Law 108-79; see Attachment 1).

## *Purpose of the Research*

On September 4, 2003, the Prison Rape Elimination Act of 2003 (PREA or the Act) was signed by President George W. Bush (Public Law 108-79). The Act requires BJS to “carry out, for each calendar year, a comprehensive statistical review and analysis of the incidence and effects of prison rape.” The Act further instructs BJS to conduct surveys and other statistical studies of current and former inmates. To implement the Act, BJS developed the National Prison Rape Statistics Program (NPRS), which includes four separate data collection efforts: the Survey of Sexual Victimization (SSV), the National Inmate Survey (NIS), the National Survey of Youth in Custody (NSYC), and the National Former Prisoner Survey (NFPS).

These collections are independent, and while not directly comparable, they provide various measures of the prevalence and characteristics of sexual assault in correctional facilities. The SSV series collects information about incidents of sexual violence reported to and investigated by adult and juvenile correctional authorities, as well as characteristics of substantiated incidents. The NIS collects allegations of sexual assault self-reported by adult and juvenile inmates in adult correctional facilities. NSYC gathers self-reported sexual assault data from youth in juvenile correctional facilities. The NFPS measures allegations of sexual assault experienced during the respondent’s last incarceration, as reported by former state inmates under active post-custody supervision.

Between June 2008 and April 2009, BJS completed the first NSYC (NSYC-1) in 166 state-owned or operated facilities and 29 locally or privately operated facilities, and between February 2012 and September 2012, BJS completed the second NSYC (NSYC-2) in 273 state-owned or operated facilities and 53 locally or privately operated facilities. Both rounds of the survey were conducted by Westat. In both rounds, youth completed the survey using an audio computer-assisted self-interview (ACASI), whereby they heard questions and instructions via headphones and responded via a touch-screen. For NSYC-1, a total of 10,263 youth participated in the survey; for NSYC-2, 9,703 youth participated.

## **Request for Pilot Testing**

This submission is to seek clearance for the pilot testing of the revised instruments prepared for the third NSYC (NSYC-3). This request falls under a cooperative agreement BJS has with Westat to collect data for NSYC-2, (award [2009-RP-BX-K001](#)). As one of the remaining tasks under the agreement, BJS and Westat have identified new items for inclusion in the draft NSYC-3 sexual assault questionnaire, the alternative questionnaire (NSYC-A), and the facility survey. BJS seeks to pilot test them in six juvenile facilities. Through a competitive solicitation process, Westat has been named as the data collection agent for the NSYC-3. The full NSYC-3 is scheduled to be conducted in 2017 following the results of the pilot test and successful submission of a full clearance package to OMB.

## *Development of the NSYC-3 Instruments*

Previous NSYC surveys have drawn two separate samples within each facility. Youth selected to answer questions on sexual assault comprised approximately 90% of the sample. The remaining 10% of the sampled youth were selected to complete an alternative survey on drug and alcohol use. Youth were randomly assigned to one of the two samples. This design feature maximizes

confidentiality because only the youth taking the survey know which questions are administered. Survey staff and facility staff do not know which survey youth completed. Information obtained from the 10% sample provided data for estimation of substance abuse and dependence among youth.

In the development of the new items, BJS and Westat reviewed the NSYC-2 findings and existing literature on sexual assault literature. Through discussions with the Office of Juvenile Justice and Delinquency Prevention (OJJDP), BJS identified additional areas of interest for the NSYC-A survey to replace the alcohol and drug questions administered in NSYC-1 and NSYC-2.

Westat conducted a literature review for each new topic area and revisited the literature for existing topics to determine if NSYC-2 items could be improved. Careful consideration was made to use measures with national norms for youth populations, whenever possible. Table 1 provides an item inventory for the NSYC-3 core (i.e., sexual assault) survey. The columns show the number of items that remained the same from NSYC-2, the number of items that were revised, and the number of new items.

No items were changed in Section C of the NSYC-2 survey as this section is used to provide estimates of the prevalence of sexual victimization. These questions remain the same so as to ensure comparability with NSYC-1 and NSYC-2 findings. Most of the new items were placed after Section C to eliminate the possibility of affecting how youth respond to the sexual victimization questions

The project team also conducted an Instrument Error Assessment Analysis on NSYC-2 items. The analysis examined the average timing of the sexual assault sections, looked at item percent missing, examined the kurtosis and skewness of continuous items, included an outlier analysis, evaluated consistency across items, evaluated inconsistent responses, and conducted an analysis of partially completed surveys. Decisions to drop or modify some items from NSYC-2 were based on this analysis.

Table 2 provides a list of the topic areas for the NSYC-A survey. Some topics appear on both the core and alternative surveys so that meaningful comparisons and analyses can be conducted between the sampled groups that did or did not experience a victimization.

The facility survey is administered concurrently to the NSYC core and alternative surveys in each sampled facility. It is a web based survey that is completed by a facility designee who reports the characteristics of the facility. Items collected on the facility survey are shown in Table 3. The facility survey comprises mostly new items, though several items are carried forward from the NSYC-2 facility survey. By combining information about the facility with the self-reported information from the residents, it presents a more comprehensive analysis of individual and facility characteristics when victimization is assessed. Selection of the items that remain on the facility survey from the NSYC-2 instrument was informed by the analysis of the facility attributes and subsequent identification of these attributes being associated with sexual victimization.

These findings were reported in the BJS Working Paper: *Facility-level and Individual-level Correlates of Sexual Victimization in Juvenile Facilities, 2012*<sup>1</sup>.

---

<sup>1</sup> <https://www.bjs.gov/content/pub/pdf/flilcsvgf12.pdf>



**Table 1: Topic Areas and Items on the NSYC-3 Core Survey**

<b>NSYC-3 Core Survey</b>	<b>NUMBER OF ITEMS</b>		
	<b>NSYC-2</b>	<b>Revised</b>	<b>New</b>
<b>Section A – BACKGROUND</b>	<b>10</b>	<b>0</b>	<b>4</b>
<i>Background</i>	8	0	0
<i>Sexual Orientation and Gender Identity</i>	0	0	4
<i>Child Status</i>	2	0	0
<b>Section B – FACILITY PERCEPTIONS AND VICTIMIZATION</b>	<b>16</b>	<b>15</b>	<b>18</b>
<i>Staff Treatment</i>	0	5	7
<i>Grooming</i>	2	6	4
<i>Youth Gang Involvement</i>	4	1	3
<i>Youth History of Sexual Victimization</i>	1	1	1
<i>Youth Misconduct and Victimization</i>	9	0	1
<i>Youth Education on PREA</i>	0	2	2
<b>Section C – SEXUAL VICTIMIZATION IN FACILITY</b>	<b>91</b>	<b>0</b>	<b>0</b>
<b>Section D – DIF: REPORTING SEXUAL ASSAULT BY ANOTHER YOUTH</b>	<b>35</b>	<b>14</b>	<b>53</b>
<b>Section E – DIF: REPORTING SEXUAL ASSAULT BY STAFF</b>	<b>63</b>	<b>17</b>	<b>48</b>
<b>Section F – NEW TOPICS</b>	<b>0</b>	<b>0</b>	<b>52</b>
<i>Disabilities</i>	0	0	15
<i>Facility Living Conditions</i>	0	0	2
<i>Mental Health</i>	0	0	7
<i>Verification Check</i>	0	0	2
<i>Youth History of Physical Victimization</i>	0	0	3
<i>Solitary Confinement</i>	0	0	13
<i>Legal Counsel &amp; Institutional Experiences</i>	0	0	10
<b>DEBRIEFING</b>	<b>3</b>	<b>0</b>	<b>18</b>
<b>TOTAL ITEMS</b>	<b>218</b>	<b>46</b>	<b>193</b>

**Table 2: Topic Areas and Items on the NSYC-A Survey**

<b>Alternative Survey</b>	<b>NUMBER OF ITEMS</b>		
	<b>NSYC- 2</b>	<b>Revised</b>	<b>New</b>
<b>Section A – BACKGROUD (same as core)</b>	<b>10</b>	<b>0</b>	<b>4</b>
<i>Background</i>	8	0	0
<i>Sexual Orientation and Gender Identity</i>	0	0	4
<i>Child Status</i>	2	0	0
<b>Section B – FACILITY PERCEPTIONS AND VICTIMIZATION</b>	<b>16</b>	<b>15</b>	<b>21</b>
<i>Staff Treatment (same as core)</i>	0	5	7
<i>Grooming (same as core)</i>	2	6	4
<i>Youth Gang Involvement (same as core)</i>	4	1	3
<i>Youth History of Sexual Victimization (same as core)</i>	1	1	1
<i>Youth History of Physical Victimization (same as core)</i>	0	0	3
<i>Youth Misconduct and Victimization (same as core)</i>	9	0	1
<i>Youth Education on PREA (same as core)</i>	0	2	2
<b>Section F – ALTERNATIVE SURVEY</b>	<b>39</b>	<b>5</b>	<b>120</b>
<i>Disabilities (same as core)</i>	0	0	15
<i>Facility Living Conditions (same as core)</i>	0	0	2
<i>Facility Living Conditions (alternative only)</i>	0	0	12
<i>Verification Check (same as core)</i>	0	0	2
<i>Mental Health (same as core)</i>	0	0	7
<i>Mental Health (alternative only)</i>	0	0	3
<i>Grievance Procedures (alternative only)</i>	0	5	0
<i>Solitary Confinement (same as core)</i>	0	0	13
<i>Treatment Programs and Services (alternative only)</i>	39	0	16
<i>Legal Counsel &amp; Institutional Experiences (same as core)</i>	0	0	10
<i>Legal Counsel &amp; Institutional Experiences (alternative only)</i>	0	0	7
<i>Youth Education and Aspirations (alternative only)</i>	0	0	11
<i>Communication with Family (alternative only)</i>	0	0	10
<i>After Release (alternative only)</i>	0	0	12
<b>DEBRIEFING (same as core)</b>	<b>3</b>	<b>0</b>	<b>18</b>
<b>TOTAL ITEMS</b>	<b>68</b>	<b>20</b>	<b>163</b>

**Table 3: Topic Areas and Items for the NSYC-3 Facility Survey**

<b>NSYC-3 Facility Survey</b>	<b>NUMBER OF ITEMS</b>		
	<i>NSYC-2</i>	<i>Revised</i>	<i>New</i>
<i>Facility Statistics</i>	5	0	30
<i>Personnel Screening</i>	2	1	5
<i>Staff Training</i>	0	0	8
<i>Facility Characteristics</i>	3	2	10
<i>Youth Assessment And Screening</i>	0	0	27
<i>Treatment And Services</i>	0	0	7
<i>Educational Services</i>	0	0	9
<i>Restrictive Housing</i>	0	0	4
<i>Grievance Process</i>	0	0	6
<i>Youth Education On PREA</i>	0	0	6
<b>TOTAL ITEMS</b>	<b>10</b>	<b>3</b>	<b>112</b>

The draft items for the youth instruments and facility survey were presented to stakeholders, including state juvenile justice administrators, advocates, and OJJDP staff at a 2-day national workshop held on April 28-29, 2016 in Washington, D.C. (The workshop agenda and list of attendees are found in Attachment 2.) BJS staff also reviewed the new topics and draft items at two national correctional conferences, with the Council of Juvenile Correctional Administrators (CJCA) PREA Committee in January and August 2016. Feedback from key stakeholders in the national workshop and the two national meetings was used to revise items for the NSYC-3 instruments.

In addition, the new items for the NSYC-3 youth instruments were cognitively tested in August 2016 after receiving OMB clearance. The goal of the cognitive testing was to ensure that youth understood the questions, terminology, and response categories for new items. Westat conducted 20 cognitive interviews with adjudicated male and female youth in three juvenile facilities. A total of 64 questions with 126 items were explored with youth using 2 separate protocols. For sensitive questions, such as those involving sexual assault, youth were asked to only provide their interpretation of these items rather than answer them directly. The topic areas for the cognitive testing are found in Table 4.

**Table 4. Topics Cognitively Tested with Facility Youth**

Version 1 (34 questions)	Version 2 (32 questions)
Facility living conditions (9 Qs)	Legal counsel & institutional experiences (4 Qs)
Staff treatment (6 Qs)	Solitary confinement (5 Qs/9 items)
Misconduct/victimization (1 Q)	Youth/gang involvement (4 Qs)
Education on PREA (3 Qs/8 items)	*Drug use (1 Q/2 items)
*Grooming behaviors (4 Qs)	*Staff incident details (9 Qs/25 items)
Mental health (4 Qs/15 Items)	*History of victimization (3 Qs)
*Youth incident details (7 Qs/18 items)	Treatment program and services (6Qs/11 items)
*Disability items (if time permits) (3Qs)	
Sexual orientation/gender identity (if time permits) (4 Qs)	

\* Respondent were instructed not to answer the questions, only to comment on their interpretation of the question

An additional 10 cognitive interviews were conducted with non-facility youth identified as gay, lesbian, bisexual or transgender (LGBT) (or who had a close family member or friend who was LGBT) in order to thoroughly test the sexual orientation and gender identity (SOGI) items. A total of seven questions (four SOGI and three disability items) were tested with the youth and young adults.

Of the 126 items tested with facility youth, including 7 questions also asked in the non-facility interviews, 79 items worked well and no changes were necessary. For 22 items, substantive edits were required, and 2 items were deleted. For the remaining 25 items that were tested, minor wording changes were recommended (see Attachment 3 for a detailed summary of the cognitive testing results).

An expert review was also conducted for the facility survey with seven administrators who attended the April BJS stakeholder workshop. They were asked to review the survey in advance, but not to complete the questions. During 30 minute telephone interviews, they provided their overall impressions of the facility survey and identified items that may be confusing or could be interpreted in multiple ways. Feedback from the expert review and this pilot test will be used to make final revisions to the facility survey.



Copies of the NSYC-3 core, NSYC-A, and facility questionnaires are found in Attachment 4. Questions are labeled as “NSYC-2” if the question was also asked on the NSYC-2 survey. Questions are labeled as “NSYC-2, modified” if the question wording has changed slightly from the NSYC-2 instrument. Questions that did not appear on NSYC-2 in any form are labeled “NEW.” Items that were subject to cognitive testing are also flagged in the document.

### **Pilot Testing Overview**

We are seeking approval to conduct pilot interviews with 150 youth and 6 facility administrators in 6 correctional facilities in preparation for the full implementation of NSYC-3. To minimize burden on the facilities, we will only recruit facilities that provide consent *in loco parentis* (ILP) for the minors in their custody. Participation in the study is voluntary, and selected youth will be given the option to participate or decline the interview. As with NSYC-2, youth will be randomly assigned by the laptop to complete one of the two instruments so no one will know which youth received questions about sexual assault. Youth assigned to the sexual victimization questions who complete the questionnaire quickly (i.e., they have not experienced a victimization and say ‘no’ to all of the items on sexual assault) will answer additional questions found on the NSYC-A questionnaire so that all surveys will be approximately the same length (30 minutes).

#### *Goals of the Pilot Test*

The pilot test is designed as a small-scale evaluation of survey operations to -

- Test computerized procedures for obtaining informed assent from youth;
- Confirm the length of time to administer the programmed NSYC core and NSYC-A instruments;
- Examine the distribution of responses to items across a diverse sample of youth;
- Receive feedback on the instrument via debriefing questions; and
- Test the ability of the facility questionnaire to capture information about the facility.

#### *Changes from NSYC-2*

Most of the administrative procedures remain the same for the pilot test as used in NSYC-2. However, the pilot test differs from NSYC-2 in the following ways:

- The revised content of the instruments (previously described above);
- The use of a quota sample in lieu of drawing a probability sample from facility rosters (described below in the section on Eligibility and Selection of Youth); and
- The computerized process for recording assent (described in the Youth Assent section below) and minor modifications to the assent form language.

#### *Recruitment of Facilities for the Pilot Test*

Six juvenile facilities will be recruited to participate in the pilot test, with a goal of getting 25 completes from each facility. Facilities selected will be those that can grant consent via *in loco parentis* (ILP) to interview the youth in order to expedite the pilot test. Previous experience

obtaining parental consent obviates any need to pretest procedures associated with this part of the recruitment process.

To start the recruitment process, facilities that had at least 20 completed interviews for NSYC-2 and granted consent via ILP will be identified and contacted. Facility administrators who agree to participate in the pilot test will be asked to designate a facility coordinator to assist in the logistics of conducting the pilot in their facilities. The administrator and facility coordinator will be provided with study materials to begin planning for the pilot test, and facilities will be asked for their procedures regarding mandatory reporting and whether it will be necessary to obtain approval from any local IRBs or research review boards. As with NSYC-2, arrangements with the facility will be made for youth to have access to either an internal or external counselor, depending on the youth's preference, if they are upset by the interview. Copies of the recruitment materials for facilities are found in Attachment 5.

### *Eligibility and Selection of Youth*

Once six facilities have been recruited, two Westat researchers will arrange to visit the facility. In order to be eligible for the pilot test, youth must be adjudicated, placed in the facility by the state, and English-speaking. A test for a Spanish version of the questionnaire will be conducted at a later point in time. To minimize burden on the facilities, a quota sample will be used whereby facilities will be asked to select youth who vary by sex, age and time spent in the facility (based on information provided on the facility roster). A probability sample is unnecessary as no statistical estimates will be made based on the results of the pilot test. The rostering and sampling process planned for the full NSYC-3 implementation remains unchanged from NSYC-2.

Guidance will be provided to facilities to assist them in identifying a diverse sample of up to 30 state-placed adjudicated youth to meet the desired quotas outlined above. Presently there are fewer female youth and youth age 12 to 14 in residential placement, thus facilities will be asked to select as many of these youth as possible for the pilot test. In addition, facilities will also be asked to include youth with varying lengths of stay and offenses, including those adjudicated for sexual offenses.

### *Youth Assent*

The approach used by NSYC to obtain youth assent to participating in the surveys has been designed to most appropriately meet the needs of the incarcerated juvenile population. Using the assent form as a script (Attachment 6), the interviewer reads the assent/consent conditions to the youth, and asks questions intended to assess the youth's comprehension of the form. Interviewers are allowed to re-read and paraphrase each question if the youth initially indicate they do not understand all or parts of the form. If the youth is unable to correctly answer all of the questions, they are politely informed that they are not eligible for the survey because the computer did not select them.

The NSYC-3 assent form has been modified to include BJS's statutory privacy statement and efforts to comply with the requirements of the 2015 Cybersecurity Act (Einstein 3A). These changes inform youth that -

- Their data will only be used for statistical and research purposes;
- There is a law that protects their privacy with a \$10,000 penalty for violations of this law; and
- All information sent over the internet to and from government computer systems is subject to screening for security threats.

The language of the assent form/script was written to be accessible to those with an 8<sup>th</sup> grade reading level.

As part of the pilot test, the computerized approach to assessing and recording youth's comprehension of the assent form will be evaluated for efficiency. For NSYC-2, both the interviewer and the youth read from paper copies of the assent form. The youth's answers to the comprehension questions were recorded on a paper form. For this pilot test, the interviewer will provide the youth with a hard copy of the assent form so the youth can follow along while the interviewer reads the assent form aloud and records the youth's answers to the comprehension questions in the computer. The interviewer will record in the computer whether the youth gave the correct answer on the first, second or third attempt.

If the youth fails to provide a correct response on the third attempt, the interviewer will record in the computer that the youth's response indicates a lack of understanding. Youth who do not understand one or more of the comprehension questions will not be able to participate in the survey. The comprehension questions remain the same as on NSYC-2, but the mode of administering them is different.

At the end of the assent process, the youth will check a box on the hardcopy assent form indicating whether or not she/he agrees to participate in the study and will be given a copy of the assent form to keep for future reference. The youth assent form and interviewer script is provided in Attachment 6.

### *Pilot Testing Procedures*

The interviews will be completed by audio computer assisted interviewing (ACASI) on a laptop, as has been done for previous rounds of NSYC. Youth will be escorted to an interviewing room designated by facility staff in advance of the facility visit and will be left alone with the interviewer. No incentives will be provided for participating in the survey.

The survey will be anonymous. The interviewer will not be given the youth's name and there will be no way to link the data on the laptop with any youth. The interviewer will position her/himself so as not to be able to see the youth's answers. As the youth is randomly assigned to take either the main NSYC questionnaire or the NSYC-A, no one will know which version of the survey the youth receive.

The sexual victimization section of the NSYC core instrument uses different language in the screener questions for younger youth (those under age 15). Younger youth are presented screener questions that use less explicit terminology to ask about sexual contact (e.g., "...rubbed your private parts") than the questions presented to older respondents. If youth respond affirmatively to one of the screener questions, then questions using more explicit terminology are used (e.g., "...rubbed your penis"). All NSYC respondents aged 15 or older are presented the version of the questions that use the more explicit terminology. This is identical to the approach used during NSYC-1 and NSYC-2.

Youth who are assigned to the main NSYC survey and complete it in less than 30 minutes will be routed to the NSYC-A topics and will complete questions on the first six topic areas as time allows within the 30-minute timeframe for the survey. Having all surveys take about 30 minutes further protects the anonymity of the youth who have answered questions affirmatively about sexual assault.

At the conclusion of the interview, the interviewers will ask the youth if he/she would like to talk to a counselor either inside or outside the facility. If the youth requests access to a counselor, the interviewer will speak with the facility coordinator to implement the counseling plan previously coordinated in advance of the facility visit.

Administrators at the six pilot test facilities will be asked to complete a paper copy of the draft facility survey. While the facility survey for the full NSYC-3 study will be web-based, piloting the survey as a paper instrument will allow for modifications to be made to the survey without incurring the costs associated with programming and creating the web based platform for this pilot. Administrators completing the paper copy will be asked to return the completed facility questionnaire to Westat.

### **Considerations and Assurances for All Pilot Test Activities**

#### *Protection of Human Subjects*

Participation in the test is voluntary; however, there is some risk of emotional distress for the youth given the sensitive nature of the topic of sexual victimization, particularly since some of the questions use behaviorally specific language. The NSYC-3 survey instruments and administrative procedures were reviewed and approved by the Westat IRB, which has federalwide assurance. The IRB determined that the study involved minimal risks to research subjects given the safeguards built into the study procedures. A copy of the approval notice is attached (see Attachment 7). The interviews will be stopped if requested by the youth or if the youth shows signs of emotional distress. All respondents will be provided with an opportunity to speak with a counselor following the interview regardless of whether the interview was completed or terminated.

#### *Mandatory Reporting*

All sexual assault incidents recorded in the interview will remain confidential. However, if a youth tells the interviewer about a potential incident of abuse or neglect, this will be reported

using the mandatory reporting procedures required by that state. This exception to the privacy assurance is covered in the assent script. As part of the assent process, youth respondents must confirm that they understand the mandatory reporting exception to the privacy statement.

This study has received an exemption to the DOJ confidentiality statutes as part of the PREA legislation. If the mandatory reporting requirement is triggered by a youth, interviewers are trained not to probe for any details on the incident, but to document as much detail as the youth provides. Mandatory reports will be made on the same day the potential abuse and neglect has been reported to the interviewer. Field staff can alert the facility administrator that a youth has made a statement only after the report has been made to an external agency. The name of the youth or the details of the reports are not shared with the facility administrator, as that could potentially place the youth at greater risk within the facility. Previous experience in NSYC administration shows that mandatory reports are relatively rare, with NSYC-2 having only 107 mandatory reports made out of 10,000 interviews.

### *Visit Debriefing*

At the conclusion of the visit, the facility recruitment task leader will debrief with the interviewers and facility liaison about the visit to see if there were any unexpected problems.

### *Language*

All pilot test interviews will be conducted in English. Translations of the instruments into Spanish language versions will be done at a later time, and submitted to OMB for approval so testing can be conducted.

### **Burden Hours for Pilot Testing**

The burden for this task consists of 1) recruitment of facility administrators to allow the visit and complete the facility survey; 2) facility coordinator arrangements for the pilot test prior to and during the visit; 3) facility security staff escorting youth to and from the interviews and; and 4) youth time to participate in the pilot test interviews. The burden associated with these activities is presented in Table 5.

A total of 197 burden hours (94 for facility staff + 103 for facility youth) is estimated for this task. This estimate is based on past experience with NSYC-1 and NSYC-2. It is anticipated that Westat staff will 1) work with six facility administrators to provide authorization to conduct the pilot test, 2) assign a facility coordinator to assist in arranging for the pilot test, 3) communicate informed assent and mandatory reporting procedures to facility staff, 4) identify local and State IRB requirements if necessary for any of the facilities selected for the pilot test, 5) complete the facility survey and participate in a debriefing call about the facility survey. It is anticipated these tasks will take about 3 hours per facility. (3 hours per facility x 6 facilities =18 hours)

Westat will work with 6 facility coordinators to specify security clearance requirements for interview staff; define mandatory reporting procedures; identify external counseling resources

for youth who request it; arrange for the data collection visit; prepare appropriate interviewing space; obtain consent for youth through *in loco parentis*; and arrange for counseling for any youth who request it. It is estimated that these tasks will take about 8 hours per facility. (8 hours per facility x 6 facilities = 48 hours)

Prior experience with administering the NSYC has shown that two facility security staff per facility will be engaged in the activity of escorting youth to and from interviews. This will take approximately 10 minutes per youth or about 5 hours per facility (2 staff x 14 youth each x 10 minutes = 4.7 hours x 6 facilities = 28 hours).

The number of interviews with youth (25 per facility or 150) is based on the need to test study procedures and both instruments in a variety of facilities. This will also permit the sample to include a sufficient number of younger youth (age 12 to 14) and older youth, as well as to include both male and female participants.

Expected burden placed on youth for this data collection averages 40 minutes per respondent. Based on the collection protocol of the NSYC-2, the consent process takes 10 minutes for the youth to complete and the interview is estimated to take 30 minutes to complete. It is anticipated that 150 youth will participate across the six juvenile facilities, resulting in a maximum estimated youth burden of 100 hours. The non-response rate for the youth in prior iterations of the NSYC is 10% of the target sample for each facility (about 3 per facility) who may refuse to participate in the pilot test. The estimated burden for non-respondents is 10 minutes or 3 hours total (for being escorted to the interviewing room and then refusing to do the survey).

**Table 5  
Estimated Burden Hours Associated with  
Planned Pilot Testing Activities**

	Maximum # of Respondents	Average Administration Time (minutes) per respondent	Maximum Burden (hours)
<b>Facility administrator communications</b>	6	180	18
<b>Facility coordinator: communication and logistics</b>	6	480	48
<b>Facility security staff</b>	12	140	28
<b>FACILITY BURDEN TOTAL</b>	24		94
<b>Completed youth interviews</b>	150	40	100

<b>Youth refusals</b>	18	10	3
<b>YOUTH BURDEN TOTAL</b>	168		103
<b>TOTAL BURDEN</b>	192 respondents		197 hours

### **Costs to the Federal Government**

The total cost of conducting the pilot test will be approximately \$179,535 under the cooperative agreement with Westat (Award [2009-RP-BX-K001](#)) for the National Survey of Youth in Custody (NSYC-2). This excludes the cost of BJS staff working on the project team.

### **Use of Information Technology to Reduce Burden**

The pilot test will use technology to facilitate facility recruitment and scheduling and to conduct the youth interviews to reduce participant burden and control study costs. Facility recruitment efforts will use email communications when possible as participants increasingly prefer to communicate via email so they can respond when it is convenient. Using email for recruitment and scheduling can help to reduce participant burden and save time and money that would otherwise be spent conducting telephone calls, leaving voice messages and making call-backs.

The youth instruments will be administered as ACASI, which reduces the burden for respondents as the computer reads the questions aloud while respondents listen through headphones and use a touch-screen to record their responses. The computerized interview further reduces burden of administration by automatically following skip patterns so respondents do not need to follow instructions on which question to answer next.

### **Data Confidentiality and Security**

BJS's pledge of confidentiality is based on its governing statutes Title 42 USC, Section 3735 and 3789g, which establish the allowable use of data collected by BJS. Under these sections, data collected by BJS shall be used only for statistical or research purposes and shall be gathered in a manner that precludes their use for law enforcement or any purpose relating to a particular individual other than statistical or research purposes (Section 3735). BJS staff, other federal employees, and Westat staff (the data collection agent) shall not use or reveal any research or statistical information identifiable to any specific private person for any purpose other than the research and statistical purposes for which it was obtained. Pursuant to 42 U.S.C. Sec. 3789g, BJS will not publish any data identifiable specific to a private person (including respondents and decedents). To protect the identity of the respondents, no identifying information will be kept on the final data file. The youth survey will not be collecting the name of any of the respondents.

## **Pilot Test Report**

Once the pilot test is complete, project staff will write a report summarizing the results. The report will include the confirmed length of time to complete the surveys, any problems found in assent/consent or instrument administration, and any issues working with the facilities. It will also provide selected frequencies and cross tabulations from the survey. No facility-level analyses will be conducted or published and no facility-level data will be shared with facilities. This pilot test report will accompany any additional OMB memos requesting clearance for the full administration of the NSYC-3 collection.

## **Contact Information**

Jessica Stroop  
Statistician, Project Manager  
Bureau of Justice Statistics  
Phone: 202-598-7610  
Email: [jessica.stroop@usdoj.gov](mailto:jessica.stroop@usdoj.gov)

Allen Beck, Ph.D.  
Statistician  
Bureau of Justice Statistics  
Phone: 202-616-3277  
Email: [allen.beck@usdoj.gov](mailto:allen.beck@usdoj.gov)