

NATIONAL ADULT MALTREATMENT REPORTING SYSTEM

Supporting Statement for Paperwork Reduction Act Information Collection Request

June 9, 2016

A. JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Elder Justice Act of 2009, which amends title XX of the Social Security Act (42.U.S.C. 13976 et seq.) requires that the Secretary of the U.S. Department of Health and Human Services “collects and disseminates data annually relating to the abuse, exploitation, and neglect of elders in coordination with the Department of Justice” (Sec. 2041 (a) (1) (B) and “conducts research related to the provision of adult protective services” (Sec. 2041 (a) (1) (D).

Furthermore, the [Elder Justice Coordinating Council \(EJCC\)](#) included as its third recommendation for increasing federal involvement in addressing elder abuse, neglect, and exploitation: develop a national adult protective services (APS) system based upon standardized data collection and a core set of service provision standards and best practices.

The National Adult Maltreatment Reporting System (NAMRS) will address these needs by establishing a data collection program on cases served by APS agencies, to which the 50 states, the District of Columbia, Puerto Rico, Guam, Northern Marianas Islands, Virgin Islands, and American Samoa will report annually on a voluntary basis.

2. Purpose and Use of the Information Collection

The Purpose of Information is to fulfill statutory requirements as described above in Section 1. The Administration for Community Living (ACL) intends on using the data collected through NAMRS for the following purposes:

- To support ACL’s federal leadership role for the development and implementation of comprehensive APS systems
- To provide a better understanding of the extent, nature, and characteristics of the maltreatment of older Americans and adults with disabilities
- To support ACL’s role in providing a coordinated and seamless response for helping adult victims of abuse and to prevent abuse before it happens
- To assist in developing model APS program standards to help states improve the quality and consistency of programs
- To support a coordinated federal research strategy to fill the gaps in knowledge and develop evidence-based interventions to prevent, identify, and report, and respond to elder abuse, neglect, and exploitation.

3. Use of Improved Information Technology and Burden Reduction

NAMRS employs modern technologies for data submission, which are efficient, effective, and improve data quality. These automated technologies reduce the burden of the states and ACL in collecting essential data used to identify program improvements.

The Agency Component and the Key Indicators Component data (see attachments A and B) will be entered through an online data form accessed on a secure website. The NAMRS application displays helpful instructions for each question as data are entered. This helps to improve the consistency and accuracy of the answers. States can begin entering the data, save the data, and return to complete the data multiple times. The application will validate the data to identify errors and provides the ability for states to correct the data before submitting to ACL. This will increase the consistency of validation, reduce the extent of validation conducted by technical staff, and lessen the need for resubmissions of data. For archival purposes, a state will be able to download its data in PDF format or Excel format. The final Agency Component and Key Indicators Component data will be securely saved and only accessible through the NAMRS website by the submitting state and ACL. In successive years, the data from the previous reporting period will be available and will be easily updatable from the prior year. This will reduce the level of effort in future years.

The Case Component is non-identifiable data about clients who received an investigation by a state APS agency during the reporting period (see attachment C). States will extract the appropriate data from their state systems into Extensible Markup Language (XML) format. States will be provided with an XML Schema Definition (XSD) file, which will provide a standard method of checking that the XML file conforms to the requirements. It defines which elements can occur, and their restrictions such as amount, order, boundaries and relationship. The XSD will be useful to state information technology (IT) units in preparing the data for submission and will ensure that the basic file structure is correct. It will provide immediate feedback before the file is submitted to ACL. These processes will reduce the need for resubmissions by the states.

Once the Case Component XML file is completed, the state will upload the file through the NAMRS secure website. Additional validation will be automatically conducted by the system and the state will receive electronic validation and summary data reports. States will be able to review the results, determine if corrections are needed, and upload a corrected file. When ready, the state submits the file to ACL for final validation that includes review by a specialist. The online validation will reduce the number of resubmissions and the burden on the states and ACL.

The level of effort for subsequent reporting periods will be greatly reduced since each state can reuse the extraction program code developed for its prior submission. Modifications may be required if there are changes to the XSD by ACL for how or what data are collected or if the state system changes. The website will assist states in managing their data files and data submission documentation, thus further reducing their reporting burden in future years.

4. Efforts to Identify Duplication and Use of Similar Information

There is no other governmental or nongovernmental ongoing program to collect systematic

data on the investigations conducted by APS agencies on behalf of older adults or persons with disabilities alleged to have been maltreated.

ACL conducts an annual collection of data on the National Long Term Care Ombudsman Program authorized under Title VII of the Older Americans Act (OAA). The National Ombudsman Reporting System (NORS) (OMB No.: 0985-0005). collects aggregated data on “each inquiry brought to, or initiated by, the ombudsman on behalf of a resident or group of residents (of a long term care facility) involving one or more complaints which requires opening a case and includes ombudsman investigation, strategy to resolve, and follow up.”¹

The NORS differs in several ways from the proposed NAMRS. The NORS collects aggregated data on complaints concerning the care of residents in long term care facilities. The NORS does not collect person level data. The proposed NAMRS collects data on investigations by APS into allegations of abuse, neglect, or exploitation of older persons and adults with disabilities, regardless of residence type. The state programs that respond to the NORS are different from those who would respond to NAMRS. The definitions in NAMRS have been closely aligned with definitions in NORS, wherever applicable. No duplication of effort will result from the NAMRS data collection.

ACL, Administration on Aging (AoA) collects annual data on Title III and Title VII of the OAA. The [State Program Report \(SPR\)](#) (OMB No.: 0985-0008, expiration 7/31/2016) collects aggregated data on the clients, services, staffing, and expenditure data from the state and territory grantees. The grantees compile aggregate level data from their local partners (e.g., Area Agencies on Aging) and send reports to ACL/AoA. The SPR does not include data collection associated with APS or on persons who have been maltreated.

There have been several national surveys or studies that examined issues and concerns of older Americans and adults with disabilities. None of these address adult maltreatment investigated by APS. Data elements, values, and definitions were examined for relevance to NAMRS to assist in future data analyses.

- The [National Survey of Older Americans Act Participants](#) (NSOAAP) (OMB No. 095-0023) is a representative sample of older Americans who are receiving OAA services, including case management, congregate meals, home delivered meals, homemaker, transportation, and family caregiver. It collects detailed information on the services received.
- The [Health and Retirement Study \(HRS\)](#) (NIA U01 AG009740) is a longitudinal panel study of a representative sample of 20,000 Americans over the age of 50 and is conducted every 2 years. The study focuses on labor force participation and health transitions.
- The [National Study of Caregiving](#) is a supplemental study from the National Health and Aging Trends Study (NHATS), which is sponsored by the National Institute on Aging (grant number NIA U01AG032947) through a cooperative agreement with the Johns Hopkins Bloomberg School of Public Health. The Caregiving

¹ Accessed from http://www.aoa.acl.gov/AoA_Programs/Elder_Rights/Ombudsman/NORS.aspx

supplemental study is a nationally representative sample of persons age 65 or older who receive assistance with daily activities. Telephone interviews are conducted with individuals who have friends or relatives participating in the NHATS.

- The [National Survey of Residential Care Facilities](#) was conducted only once in 2010 and collected data on service providers, their staffs and services, and their residents. (OMB No.: 0920-0780)
- The [National Core Indicators](#) was developed by HSRI and the National Association of State Directors of Developmental Disabilities Services is used for quality management of state agencies. Forty states participate in one or more of the standardized surveys including a consumer survey, family survey, and a provider survey. The family survey includes a question about knowing how to report abuse or neglect, but does not collect information on maltreatment.

5. Impact upon Small Businesses or Other Small Entities

The proposed data collection does not involve small businesses or other small entities. Data will be submitted only by state APS agencies.

6. Consequences of Collecting the Information Less Frequently

Annual data collection is the minimal frequency that permits meaningful program and policy activities to be carried out. Administrative and legislative actions regarding the problem of abuse, neglect, and exploitation require the annual collection of data. Annual data collection is supported by the state agencies for the following reasons:

- Once the state data system is programmed to submit the Case Component data, annual extraction is a minimal burden.
- Annual data collection enables a state to maintain the interest, commitment, and expertise necessary for participation. Less frequent collection may result in increased burden due to the need to retrain staff.

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

Special circumstances are discussed below.

- *Report Information More Often than Quarterly.* There are no circumstances that could result in the data needing to be collected more frequently than quarterly. The proposed schedule of data submission is once a year.
- *Requiring Response in Less than 30 Days.* There are no circumstances that could result in a state needing to respond in less than 30 days. States will have approximately 120 days to respond once having been formally notified.
- *Requiring Respondents to Submit More than One Original and Two Copies.* States will be expected to submit only one Agency Component data form, and either one Case Component data file or one Key Indicators Component data form.
- *Requiring Respondents to Maintain Records for More than 3 Years.* Only data for a given data collection year are required. Because states extract data submissions from their administrative databases, their source data are maintained for state purposes. NAMRS will archive each state's submission and will provide the state with prior data submissions, as needed. States will not need to retain their submissions.

- *In Connection with a Statistical Survey.* These data are not collected as part of a statistical survey.
- *Use of a Statistical Data Classification that Has Not Been Approved by OMB.* This data collection does not require the use of statistical data collection.
- *Pledge of Confidentiality.* To ensure the confidentiality of the Case Component data, each state will encrypt identifiers. No actual case or individual identifiers will be submitted. No identifying data, such as name, address, or Social Security number, will be collected. Each state will ensure that its data meet a standard of encryption.
- *Requiring Respondents to Submit Trade Secrets or Other Confidential Information.* The NAMRS will not collect any data related to trade secrets. No identifying data on any individual will be collected.

A Privacy Act “system of records” is defined as “a group of any records under the control of any agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual” (The Privacy Act of 1974, 5 U.S.C. § 552a). NAMRS does not fall under Privacy Act system of records requirements. No identifiable data will be collected or maintained.

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

The project team consulted with federal agencies, including the Department of Justice and Centers for Disease Control, as well as with more than 40 state administrators, researchers, service providers, and other individuals in the field. Over 30 state representatives from 25 states provided input with 9 states participating in the pilot effort. After the pilot, every state and territory was contacted to participate in informational sessions and provide input. A 60 day Federal Register notice was published on Tuesday, March 22, 2016, Vol. 81, Page 15309. A 30 day Federal Register notice was published on Monday, August 8, 2016, Vol. 81, page 52438. Below is a list of comments received during the 30-day public comment period, along with responses. Immediately, following is a list of comments and responses from the 60-day comment period. Data specifications were updated based on some of the comments, as indicated.

Table A. 30-day Comment Period

Name of Commenter	Question/Comment	ACL Reply
Erin S.	Our biggest piece of commentary is noting that different states have different policies and procedures for APS. This could lead to a problem with compiling state data. We sometimes notice that there is sometimes variation within the same state about how policies and laws are interpreted by different jurisdictions.	We agree about the differences with policies and procedures for APS. The Agency Component was designed to assist with having such an understanding and identifying the nuances. We also agree that reports of compiled data will require notification of variations.

Name of Commenter	Question/Comment	ACL Reply
Kathleen K.	It is a huge problem that this does not include Public Health Nurses Should also include Parish Nurses, FBO Nurses.	Data element Clt25 is meant to identify types of services rather than the means or vehicle that provides the service. The suggested changes would put an additional qualifier in terms of the type of data collected regarding services.
Kathleen K.	Please consider: Change “ 1= care/case management services” to “1=Social Worker care/case management services” <u>and</u> add “2=Nurse care/case management services” (subsequent renumbering); AND/OR please consider: Add after #11 “Nursing consultation services” (subsequent renumbering).	Data element Clt25 is meant to identify types of services rather than the mean or vehicle that provides the service. The suggested changes would put an additional qualifier in terms of the type of data collected regarding services.
Kathleen K.	Definition of Code Values for Reporting Source, #8-“Medical or health professional”=“People employed by a medical facility or practice”. The group in this definition goes on to list nurses, but nurses work outside medical facilities or practices (public health, home health, insurance agency case managers etc.). Please consider: Change #8 Value Definition (first sentence) to “People employed by a medical facility, practice, or other healthcare setting.”	During the pilot and user testing periods the existing definitions have not proven confusing to states, and states have been able to map to the existing definition. We will take this under advisement during future updates to the NAMRS system.
Steven E.	There should be a public oversee committee that would include 51% individuals that have similar disability.	NAMRS is a data collection system. It contains data submitted by states based on information that they collect. The proposal to implement an oversight committee for APS is beyond the scope of this project.
National Consumer Voice for Quality Long-Term Care	We recommend that the data collection be mandatory, rather than voluntary, as we believe that standardized data collection is needed to improve the prevention, investigation and resolution of ANE cases.	There are no laws or statutes requiring NAMRS submission, therefore the system is identified as voluntary.

Table B. 60-day Comment Period

Name of Commenter	Question/Comment	ACL Reply
David B.	The main comment I have in regards to data collection is the lack of outcome data elements that will provide the opportunity to evaluate and compare different intervention/service models.	Most APS programs do not collect the type of outcome data suggested by Dr. Burns. NAMRS does collect a number of data elements related to services and if a state submits Case Component data, then research can be conducted on the issue of re-victimization. Goal attainment scaling (GAS) is promising but APS programs do not generally conduct multiple assessments of a client as required by GAS. Future enhancements to NAMRS will consider the availability of outcome data for inclusion.
April S.	Section K4, regarding possible reasons for not completing an investigation, caught my eye. One frequent reason for not completing an investigation is that the investigator was <u>unable to obtain key information from collateral contacts that would help in the determination of a finding.</u> For example, in the case of suspected Financial Exploitation, it is often difficult to obtain needed financial documents/information from banking institutions. This was not offered as a selection in section K4, and it may be useful to do so.	The inability to collect information is a problem; it is not evident that the lack of information is a reason for not completing an investigation. Although, it may be a reason for having an inconclusive finding. At this time, the decision has been made not to change the selection options and "investigation unable to be completed (non-specific" should be used in this scenario.
Maria G.	Recommend changing KI data element name "Investigation Completed" to "Investigation Closed". There is a code value with the same name and it may cause confusion. (KI-Clients by Case Closure Reason code value "Investigation Completed")	We agree that collecting this information with be valuable to NAMRS. The recommendation will be implemented.
Maria G.	A perpetrator may be younger than 18 years of age. Recommend adding "17 and younger" to KI-Perpetrator by Age.	We agree that collecting this information with be valuable to NAMRS. The recommendation will be implemented.

Name of Commenter	Question/Comment	ACL Reply
Maria G.	Recommend adding “Other” to KI-Victims by Race. Some states systems include “other” in race codes.	We agree that collecting this information with be valuable to NAMRS. The recommendation will be implemented.
Maria G.	A perpetrator may be younger than 18 years of age. Recommend adding “17 and younger” to Case-Perpetrator Age.	We agree that collecting this information with be valuable to NAMRS. The recommendation will be implemented.
Maria G.	Recommend changing case data element name “Perpetrator Legal Remedy” to “Perpetrator Legal Remedy Recommendation” and remove “recommendation of” from value codes. This just helps to reduce redundancy.	We agree that collecting this information with be valuable to NAMRS. The recommendation will be implemented.
Maria G.	Recommend adding “Other” to Case-Client Race and Case-Perpetrator Race. Some states systems include “other” in race codes.	We agree that collecting this information with be valuable to NAMRS. The recommendation will be implemented.
Joseph R.	NASOP recommends that the Long-Term Care Ombudsman Program (LTCOP) is added to Inv3 as a report source.	This suggestion will be considered for future enhancements. Since state systems are so diverse, it would be difficult to provide a comprehensive drop down list with the initial system implementation.
Joseph R.	In Clt111, the reference to marital status and a state’s residency laws is unclear. If intended to refer to same sex marriage or common law marriage laws, we encourage you to consider alternative language that is more specific and clear.	The project team consulted with more than 40 state administrators, researchers, service providers, and other individuals in the field, and over 30 state representatives from 25 states regarding data elements, including this one. All states have a status of legal same sex marriage (except American Samoa), and some (4) also have civil unions, domestic partnerships. A decision has been made not to modify the language, but this suggestion will be considered for future enhancements.

Name of Commenter	Question/Comment	ACL Reply
Joseph R.	In Clt129, the LTCOP is listed as an agency to which the client was referred. In Clt125, Clt126, Clt127 and Clt128, we recommend that Long-Term Care Ombudsman services be added to the list of services provided to or referred to the client.	Clt25 through Clt28cc refers to types of services in which a client may be referred. It could become burdensome for States if the system listed every available service. Therefore, a decision was made to collect data regarding types of services rather than specific services such as LTCOP.
Joseph R.	Finally, NASOP would like to make a general observation that NAMRS is proposing to ask states to collect a great deal of information which they may or may not be already collecting. This client level data may be difficult for some states to report, and the problem of inconsistent data collection across the nation is more likely to continue.	It is understood and agreed that states may or may not be collecting some of the requested information. By establishing a national reporting system, the goal is that states will move towards consistency around the NAMRS elements.
Jeanette D.	Prior to reviewing each component data form, it would be good to know who is to use the form, how often, and the purpose of the form.	The effort has been designed to provide support and assistance through a variety of approaches. This includes NAMRS training to state designees, ACL/NAMRS website announcements, webinars, state liaisons, and informational documents.
Jeanette D.	Table 2 Agency Profile: concerned there is this category but no elements are required. Could this be required one time each year? The reports could be entered but not submitted until this is complete.	This comment appears to have 2 components and will be addressed as such: 1) Very few data elements are required in order to submit to NAMRS. The goal is to obtain as much data as possible while understanding NAMRS is voluntary and the reporting ability of states vary greatly. All states are strongly encouraged to provide information for each data element to the best of their ability. 2) Data submission is on an annual basis (Federal Fiscal Year Oct-Sept).
Jeanette D.	Agency5 Data Sources, could a data source be Area Agencies on Aging (AAA)?	Area Agencies on Aging (AAA) as a data source is captured in data element Agency 5.1. States can list other agencies in the comment section.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	<p>Agency5.1 Comment Provide names of other agencies that provided data. I think you could have a drop down here. The information would be succinct and more valuable. Suggestions for drop down: AAA, police office, sheriff's office.</p>	<p>This suggestion will be considered for future enhancements. Since State systems are so diverse, it would be difficult to provide a comprehensive drop down list with the initial system implementation.</p>
Jeanette D.	<p>Agency6, it would be hard to compare any of the data in this element across reports. The request should be for the definition of persons covered by state statute for adult protective services investigations. For Iowa, Dependent adult" means a person eighteen years of age or older who is unable to protect the person's own interests or unable to adequately perform or obtain services necessary to meet essential human needs, as a result of a physical or mental condition which requires assistance from another, or as defined by departmental rule (235B.2.4). Some states will have all the elements you want in the definition but in the Iowa definition does not providing the living arrangement. You could break the information you want into different elements, such as age and then have a drop down for age. Another element of living arrangement and then a drop down of living arrangements. Technically you could just pull this information from the statutes and omit this element and save time because in the end the information you will receive will be as good as the person entering the data.</p>	<p>The data element description will be clarified to explain that the request is to provide the state statute or citation regarding mandates as to who APS serves in each state.</p>

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Agency7), there are two questions asked: 1) number FTEs responsible for hotline and 2) number FTEs responsible for investigations. Sometimes different agencies/departments/divisions are responsible for hotlines and the information is passed on to APS. Separate these two requests into different elements.	This data element serves to collect the total number of unduplicated FTE dedicated to hotline and investigations. It is understood that sometimes this work is provided by different agencies. Therefore, NAMRS is collecting the aggregated number. Additional information and clarification can be provided by states in the comment section
Jeanette D.	Agency8.1) asks for addition information on the definition of intake. There has been no definition of intake provided yet. Ask for the definition of intake.	Agency 8.1 serves to gain additional information about the state's definition. We are asking states to provide their unique definition. To provide additional clarity, the element description for Agency 8.1 will be modified to say, "Provide additional information on your state's definition of intake".
Jeanette D.	Agency9) asks for number of reports accepted for investigation during reporting period. Do you need to know the reporting period? Is it annually within a calendar year or fiscal year July/June or October/September?	The reporting period is the federal fiscal year of October through September. Data will be submitted by March for the prior fiscal year. The NAMRS website will also communicate the time frames.
Jeanette D.	Agency9.1) asks for I&R/I&RA, this should be spelled out the first time	This recommendation will be implemented by spelling out the words in the data element description.
Jeanette D.	Agency10) is this element the mean of all reports in a reporting period? Or is this requested for each report.	This data element refers to the standard set by state policy and practice. States are to provide the length of time required by policy; the information is not a data request for each report.
Jeanette D.	Agency11) when you ask length of time are you collecting the information in minutes or hours and minutes?	The intent is to collect the information in days. The element description will be modified to provide clarity.
Jeanette D.	Agency11.1) asks two different questions; 1) define start of investigation and 2) define completion of an investigation. Break this question into two elements.	Agency11.1 is a text comment field for states to provide their unique definition of investigation start and completion of investigation. The decision has been made not to modify this data element into two elements.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Agency12) are you including in the drop down all the terms used in the statutes that each state would require investigations for? For example, the following are terms used to describe exploitation in the 50 states and District of Columbia statutes. Wondering why at least material abuse is not in the drop down?	The drop down list is purposely designed to be broad. Terminology varies greatly across states; therefore, it would be extremely burdensome to attempt to capture every variation. States will need to make decisions in regards to the best way to map their data.
Jeanette D.	Agency13.1) Why have them give you the law section when it can be obtained for each state from the codes? Results will be more accurate if someone knowledgeable with the codes retrieves the information rather than someone from an agency.	The belief is that the state agency is more familiar with their state laws and regulations. ACL does not believe they should interpret such data for each state.
Jeanette D.	Agency14) This element asks for two items so break it into two elements: 1) risk tools and 2) safety tools. Agency 14.1) It would be better to list the tools rather than ask for names. I'm not totally sure what you want from Agency14. Do you want cognitive evaluations or risk for abuse or actual abuse?	The desire is to capture the names of all standardized tools currently in use. The wording will be updated to reflect this. There are two reasons why a list of available tools is not provided. 1) there are numerous tools currently in place and a drop down list would be very cumbersome. 2) Some states create their own tool or use a hybrid version of standard tools. At this point in time, there is value in requesting the names of all tools without differentiating the type or suggesting a title. Future enhancements to NAMRS will be based on data analysis and may reflect a change to this element.
Jeanette D.	It would be good to know if this form is required once a year or semi-annually or every time a report is made.	If the question is in reference to the frequency of submission for the State Agency Component, it is to be submitted on an annual basis.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	<p>Table 1-Investigations</p> <p>K1, when will you ask for the reporting period?</p> <p>K2, what additional information would you want? Suggest listing some ideas of what else you would want or omit this element.</p>	<p>Re K1: The reporting period is the federal fiscal year of October through September. Data will be submitted by March for the prior fiscal year. The NAMRS website will also communicate the time frames.</p> <p>Re K2: In these comment fields, states are being asked to provide any additional relevant information they choose. This data element is optional.</p>
Jeanette D.	<p>Should you define interagency coordination? Do you mean APS and mental health services or APS and police services?</p>	<p>Interagency coordination is defined in Clt29 and Case Component documentation as, "The agencies to which the client was referred." This definition will be added to K3.</p>
Jeanette D.	<p>Could K4.1, K4.2, K4.3,K4.3.1 etc. be drop down and merged into one question?</p>	<p>The data elements are separated in order to obtain different types of information for greater data analysis.</p>
Jeanette D.	<p>Victims by age: could the age be provided rather than the grouping of ages? The information would provide more accurate information.</p>	<p>Since Key Indicators data elements are aggregated data, states may not collect this level of information and it may create an extra burden for states to provide data by age.</p>
Jeanette D.	<p>Victims by race: this could be one element with a drop down. If left the way it is, the choice multi-racial needs to be added.</p>	<p>The method to collect data on race is similar to the method used by the U.S. Census. A multi-racial person is counted in each race category. The data element description will be clarified to say, " A multiracial victim is counted for each race identified. For example, if a victim is Asian and White, the victim should be counted in both race categories. If specific races cannot be identified for a multiracial victim, the victim is counted in "Other" category."</p>

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Victims receiving benefits: I don't know what this means. What benefits?	Cl15 data element description explains this as, "The federal and state benefits received by the client during the investigation." The types of benefits include but are not limited to: Medicaid, Medicare, publicly subsidized housing, Social Security Disability Insurance, Social Security retirement benefits, Supplemental Security Income, Temporary Assistance for Needy Families, and veterans' disabled benefits. This clarification will be added to the K10 data element description.
Jeanette D.	K12 information would be more accurate if you provided a drop down of what you wanted here such as medical diagnoses listed, such as Post-traumatic stress disorder, adjustment disorders, anxiety disorder, obsessive-compulsive disorder, etc. Not sure if this is what you want but having a drop down would help.	Since Key Indicators data elements are aggregated data, states may not collect this level of information and it may create an extra burden for states to provide data by type of behavioral condition. The types of diagnoses include, but are not limited to: alcohol use disorder, anxiety, bipolar disorder, dementia, depression, schizophrenia and other psychotic disorders, substance use disorder, and traumatic brain injury. This clarification will be added to the K12 data element description.
Jeanette D.	Victims by maltreatment type. I'm not sure if this is asking for the number and types of abuse allegations for one client for one case?	The instructions for K13 Maltreatment state, "A victim is counted each time he/she was substantiated as a victim of a specific maltreatment type. If a person was found to be a victim of neglect in two investigations, the count for neglect would be two for that victim"
Jeanette D.	For age of perpetrator, I'd just ask for age and not group the data.	Since Key Indicators data elements are aggregated data, states may not collect this level of information and it may create an extra burden for states to provide data by age.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Table 1 Inv2, not sure why you wouldn't require the report date and Inv5 the investigation start date. That information would yield good data to know if the agencies are investigating in a timely manner. Do you want to specify the date form, such as month month/day day/year year year year?	Very few data elements are required in order to submit to NAMRS. The goal is to obtain as much data as possible while understanding the diverse reporting ability of states. All states are strongly encouraged to provide information for each data element to the best of their ability.
Jeanette D.	Cl5 why group 75 through 84 and 85 and older. Each age should be recorded.	A decision was made to collect age groupings rather than exact ages to decrease the opportunity to reveal personally identifiable information. This data in combination with other demographics could compromise privacy.
Jeanette D.	Cl6, should you add 4 = other, specify?	The project team consulted with more than 40 state administrators, researchers, service providers, and other individuals in the field, and over 30 state representatives from 25 states where values for data elements, including this one, were discussed. A decision was made to not add an additional data element for the initial system implementation.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	ClT8, will multiple race have a code number? It's not in the list of code values	ClT8 data element description states that multiple race code values can be submitted. The detailed mapping document provided to the states will also include instructions. The method to collect data on race is similar to method used by the US Census. A multi-racial person is counted in each race category. The following clarification will be made to the data element description, "The population(s) or group(s) that the client identifies as being a member. A client may have more than one race (multi-racial). For example, a client is Asian and White, the client should be reported with both race values. If specific races cannot be identified for a multiracial client, the client is reported as "Other"."
Jeanette D.	ClT10, do you want them to write in the language under other?	No, the value of 13 - other may be used to represent languages that are not listed. NAMRS does not require or allow additional information to be written in.
Jeanette D.	ClT25, would nursing services be appropriate under code values? Same for ClT26, ClT27, ClT28	Nursing services should fit under one of the other provided code values such as in-home assistance, medical rehabilitation, etc. The mapping process will help facilitate this.
Jeanette D.	Mal1 again with the list of maltreatments, do you want to think about all categories from the state statutes?	The code values are purposely designed to be broad. Terminology varies greatly across states; therefore, it would be extremely burdensome to attempt to capture every variation. States will need to make decisions in regards to the best way to map their data.
Jeanette D.	Mal2 for the code values states use different terms, such as validated/not validated or founded. Do you want to put some equivalent in?	It is understood that terminology varies greatly across states. States will need to make decisions in regards to the best way to map their data. NAMRS training and liaisons should be able to help with the decision making process.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Per2 Avoid have group of 75 through 84 and 85 and older. Have them list the age.	A decision was made to collect age groupings rather than exact ages to decrease the opportunity to reveal personally identifiable information. This data in combination with other demographics could compromise privacy.
Jeanette D.	Per3, add code value 4 = other, specify.	The project team consulted with more than 40 state administrators, researchers, service providers, and other individuals in the field, and over 30 state representatives from 25 states where data values, including this one, were discussed. A decision was made to not add an additional data element for the initial system implementation. This concept will be examined further for future enhancements.
Jeanette D.	Per4, add a multiple race code number.	The method to collect data on race is similar to method used by the US Census. A multi-racial person is counted in each race category. The following clarification will be made to the data element description, "The population(s) or group(s) that the perpetrator identifies as being a member. A perpetrator may have more than one race (multi-racial). For example, a perpetrator is Asian and White, the perpetrator should be reported with both race values. If specific races cannot be identified for a multiracial perpetrator, the perpetrator is reported as "Other".

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Per7, leave schizophrenia as its own code and put other psychotic disorders with a different code to separate the two and provide more accurate information. Have you reviewed the DSM diagnostic criteria for all types of disorders?	The project team consulted with more than 40 state administrators, researchers, service providers, and other individuals in the field, and over 30 state representatives from 25 states regarding data elements such as this one. The DSM 5 was reviewed as well. A decision was made to not add an additional data element for the initial system implementation. This concept will be examined further for future enhancements.
Jeanette D.	CPR3, there are many more relationship values, such as grandniece, great grandchild, half-brother, daughter-in law, brother in law, cousin, etc. Might want to consider adding more. See. Daly, J. M., Gaskill, K., & Jogerst, G. J. (2011). Essential data elements for reporters of elder abuse. Journal of Elder Abuse & Neglect, 23(3), 234-45.	The U.S. Census Current Population Survey was used as a guide. The values are purposely designed to capture only specific values. Data collection varies greatly across states, therefore, it would be extremely burdensome to attempt to capture every variation. The "other relative" data element is used to capture the other mentioned relationship values.
Jeanette D.	Report source 7, seems like police, courts, district attorney’s office, etc. should all have their own code number rather than being grouped together.	The data element value list is purposely designed to be broad. Data collection and terminology varies greatly across states; therefore, it would be extremely burdensome to attempt to capture every variation. States will need to make decisions in regards to the best way to map their data. Future enhancements to NAMRS will be based on data analysis and may reflect a change to this element.
Jeanette D.	Report source 8, a medical or health professional could be self-employed. The definition doesn’t need “people employed by a medical facility or practice.” Should nurse practitioner be added to the list? And nurse assistant/medical assistant, x-ray technician, social workers, activity therapists, occupational therapists, physical therapists.	Inv3 report source data, value 8: medical or health professional does not limit the definition. Additionally, self-employed is considered employed. The data element value list will not be changed.

Name of Commenter	Question/Comment	ACL Reply
Jeanette D.	Report source 9, the definition should be one sentence, change the first period to a comma and make “I” lower case.	A decision has been made to not change the sentence structure of the definition.
Jeanette D.	Should you have definitions of allegation, victim, perpetrator, investigation, investigator?	States have their own working definition or policy in regards to these terms. Some standards and definitions are collected in the Agency Component to learn about the variations. A decision was made to have states use their own definition for the initial system implementation. This concept will be examined further for future enhancements.

9. Explanation of Any Payment or Gift to Respondents

No payment to respondents is required as part of this data collection.

10. Assurance of Confidentiality Provided to Respondents

As no individual is identified in the data collection process, no assurance of confidentiality will be needed. States will be responsible for completely encrypting the record identification numbers. Technical assistance (TA) will be provided to states on encryption methodologies, but the final algorithms will be retained only by the state. A Privacy Impact Assessment (PIA) is being conducted.

11. Justification for Sensitive Questions

The data collection instruments will not collect any data of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

The annual burden estimates are shown below.

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Agency Component	56	1	13	728
Key Indicators Component	31	1	40	1240
Case Component	25	1	150	3750

Estimated Total Annual Burden Hours:

5,718

These estimates are based on the experience of the nine states that piloted the Agency Component, the five states that piloted the Case Component, and the four states that piloted the Key Indicators Component. While the estimates for the Agency Component were quite consistent across the pilot states, the estimates for the Case Component varied greatly. States expended varying amounts of time completing their data submissions.

The estimates are based upon those states that invested considerable attention to submitting comprehensive data. The costs have been confirmed by states as appropriate estimates of their costs.

The following estimate assumptions are based on the NAMRS data submission being voluntary, and based on ACL experience and communication with states in terms of their ability to submit data, reflecting that:

- Not all states will be able to, or interested in, submitting certain data
- States vary widely in terms of what data they currently collect and what resources they have for data submission.

The annualized burden estimates gradually increase from the first year of implementation to subsequent years. This is because discussions with states revealed that not all states will have the ability or resources to fully participate in the first year. Based on discussions with states, ACL estimates of first and future years levels of effort assume the following:

- In the first year, 15 states will submit the Case Component; 41 states will submit the Key Indicators Component; and all states will submit the Agency Component.
- In the second year, 25 states will submit the Case Component; 31 states will submit the Key Indicators Component; and all states will submit the Agency Component.
- In the third year, 35 states will submit the Case Component; 21 states will submit the Key Indicators Component; and all states will submit the Agency Component.

The estimated annual burden is derived from the experiences of the pilot states using the following conditions:

- Labor Category: States identified programmatic staff and IT staff to participate in NAMRS. Pilot states reported programmatic staff positions as Senior Program Managers and Program Associates (or equivalent), and IT staff positions as Senior IT managers and Software developers (or equivalents).
- Labor Costs: Salary ranges for the above were used to determine an average for state programmatic and IT staff, and were based upon an average hourly salary of \$46.00 for state programmatic staff and \$69.00 for state IT staff. These average hourly rates were estimated by using [Bureau of Labor and Statistics \(BLS\) information](#), estimates of annual cost of living increases, and using the [review of salaries of state personnel](#). In addition, conversations were held with states to determine how salaries are or are not increased over time.

The labor category and costs estimates above were then used to estimate the total cost estimates for states participating in the agency component, key indicator component, and case component. Across all respondents, for the Agency Component:

- *Programmatic staff* total annual burden is estimated at 582 hours at \$46 per hour for a total of \$26,772;
- *IT staff* total annual burden is estimated at 146 hours at \$69 per hour for a total of \$10,074.

Across all respondents for the Key Indicators Component:

- *Programmatic staff* total annual burden is estimated at 1,116 hours at \$46 per hour for a total of \$51,336;
- *IT staff* total annual burden is estimated at 124 hours at \$69 per hour for a total of \$8,556.

Across all respondents, for the Case Component:

- *Programmatic staff* total annual burden is estimated at 675 hours at \$46 per hour for a total of \$31,050;
- *IT staff* total annual burden is estimated at 3,075 hours at \$69 per hour for a total of \$212,175.

These totals result in an estimated total annual cost of \$339,963 for all states and territories to participate in NAMRS.

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

Because the NAMRS data collection effort depends upon the existing state administrative information systems, states will not incur special data collection costs. Most of the data collected are standard data used by the agency. Operating costs of the information systems are part of state agency operations, and are not maintained solely for the purpose of submitting data to NAMRS.

14. Annualized Cost to the Federal Government

The annual cost to the Federal Government is shown in the following table.

AGENCY	YEAR 1	YEAR 2	YEAR 3	AVERAGE
ACL	\$95,000.00	\$95,000.00	\$95,000.00	\$95,000.00
Contractor Staff	\$847,550.82	\$989,155.70	\$1,144,530.20	\$993,745.57
Total	\$942,550.82	\$1,084,155.70	\$1,239,530.20	\$1,088,745.57

The above costs are based upon the use of contractor staff to maintain and operate the system; and collect, validate, process, and analyze the data components of NAMRS. Contractor staff also provide TA to states to help them submit quality data to NAMRS. Federal staff direct and monitor all efforts.

15. Explanation for Program Changes or Adjustments

Not applicable.

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

The highlights of the annual data collection schedule are as follows:

- September 30—federal fiscal year closes
- October 1—data request letter sent to all states
- *January-March 31—data submissions from all states; data validation completed
- June 30—initial data analyses
- July 1–September 30—additional analyses and report writing

*First year submission will begin once OMB approval is received and is expected to continue through March 31.

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

The expiration dates will be displayed on the data collection instructions and instruments.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions to the above certification are being sought.

B. STATISTICAL METHODS (USED FOR COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS)

1. Respondent Universe and Sampling Methods

No sampling methods will be applied to this data collection program. Variation among states and the need to provide state-level data make sampling an inappropriate approach.

2. Sampling Procedures

Not applicable.

3. Response Rate

Not applicable.

4. Tests of Procedures

A pilot test of the data reporting instruments and methods was conducted with nine states. The state agencies were able to submit the data that was requested, based on their state information systems. Data elements, values, and definitions were discussed at several stakeholder meetings. A list of persons consulted on different aspects of the data content and the functionality of the system to reduce reporting burden during the project is as follows:

Partners

UCI: Mary Twomey, Laura Mosqueda,
Kerry Burnight
NAPSA: Kathleen Quinn
Andrew Capehart
Mark Lachs
Marie-Therese Connolly

Consulted via Phone Conferences

Joel Dubenitz
Kirsten Beronio
Joe Snyder
Erica Wood
Jason Karlawish
Megan Healy
Pam Doty
Greg Link

State Working Group Meeting 1

IA: Jone Staley
MA: Nancy Alterio
NC: Suzanne Merrill, Nancy Warren
NY: David Hunt
PA: David Gingerich
TX: Karl Urban
UT: Susan Street
WA: Mike Wagner

State Working Group Meeting 2

CO: Peggy Rogers
FL: Roy Carr
IN: Michael Patterson, Sherry Beck
MD: Valarie Colmore
ME: Ricker Hamilton
MN: Mary McGurran
NJ: Jennifer Mills
OK: Barbara Kidder
NV: Jill Berntson
APS Director: Mary Lynn Kasunic
APS Subject Expert: Jennifer Spoeri

State Working Group Meeting 3

AL: Patricia Moscato Faircloth, Tonia Bell
AR: Douglas Walker
GA: Barbara Pastirik, Dawn Washington
IL: Lois Moorman
MO: Kathryn Sapp
MT: Michael Hagenlock
TX: Michael Roberts
APS Subject Expert: Arthur Mason

Stakeholder Calls

David Bass
Scott Beach
Kendon Conrad
Valerie Eames
David Johnson
Mary Ellen Kullman
Art Mason
Holly Ramsey-Klawnsnik
Kathleen Wilber
Marie-Therese Connolly
Nancy Alterio
Georgia Anetzberger
Nora Baladarian
Carmen Castenada
Mary Counihan
Carol Dayton
John Holton
Nyla McCarthy
Becky McGowan
Gail Nardi
Karl Urban
Jill Bernston
Howard Black
Shelly Boyd
Tameshia Bridges Mansfield
Bob Fleischner
Jilene Gunther

Alison Hirschel
Kathleen Kelly
Joe Snyder
Doug Shadel
Page Ulrey
Risa Breckman
Jason Karlawish
Octavio Martinez
Kathy Park
Nancy Warren
Susan Wehry
Karen Wolf Branigin
Bonnie Olsen
Erica Wood
David Hoffman
Ricker Hamilton
Pam Teaster

NAMRS Sprint Reviews*

MT: Michael Hagenlock
PA: Katherine Zumbrun, Denise Getgen
GA: Barbara Pastirik, David Hay, Sharee Rines, Arvine Brown, Alexandra Rozefort
IL: Lois Moorman, David Weibring, Alice Hayes

**Additional staff members from these four states sometimes attended.*

5. Contact Individuals

The person at ACL responsible for NAMRS is: Stephanie Whittier Eliason at 202-795-7467 or Stephanie.whittiereliason@acl.hhs.gov.