

National Study of Children's Bureau's Title IV-E Child Welfare Waiver Demonstrations

OMB Information Collection Request New Collection

Supporting Statement

Section A

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THE SUPPORTING STATEMENT

National Study of Children's Bureau's Title IV-E Child Welfare Waiver Demonstrations

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Children's Bureau (CB) in the Administration on Children, Youth & Families (ACYF), Administration for Children and Families (ACF), U.S. Department of Health & Human Services (DHHS), seeks approval for the data collection instruments and procedures described herein. The proposed information collection is necessary to understand the experience and activities of State, local, tribal, and other publicly administered or publicly supported child welfare agencies (hereafter known as jurisdictions) participating in Title IV-E Child Welfare Waiver Demonstrations.

The National Study of the Title IV-E Child Welfare Waiver Demonstrations (hereafter known as the National Study) is sponsored by CB and involves the conduct of a multiyear cross-site study of jurisdictions approved to operate demonstrations involving title IV-E fiscal waivers authorized by the Child and Family Services Improvement and Innovation Act, P.L. 112-34, on September 30, 2011. The National Study will be conducted with 25 jurisdictions with Terms & Conditions approved in Federal Fiscal Years 2012, 2013, and 2014. James Bell Associates, Inc. (hereafter known as the contractor), will conduct the National Study as a subtask of its evaluation training and technical assistance contract with CB. CB intends for information collection to begin upon Office of Management and Budget (OMB) approval and continue until December 2018.

Legislative Background and Study Purpose

Waiver demonstration projects were initially authorized under Title XI, Section 1130, of the Social Security Act in 1994. The first demonstrations were implemented in 1996. In 1997, the Adoption and Safe Families Act (ASFA) extended the time period for new waivers from 2003 to March 31, 2006. As noted above, new waiver demonstrations were again authorized under P.L. 112-34 on September 30, 2011. All current waiver demonstrations are required to terminate no later than September 30, 2019. The waiver jurisdictions, under each of the authorizations, have been required to include an evaluation of their demonstration conducted by a contracted third-party evaluator. The National Study is the only examination of the demonstration experience that cuts across jurisdictions. The information collection in this request is an important component of the National Study.

2. Purpose and Use of the Information Collection

The information collection described in this request will allow CB to better understand the jurisdictions' collective experience of implementing their demonstrations and operating with increased fiscal flexibility. The new knowledge will be disseminated to the field in a timely manner and will inform technical assistance activities planned by the Bureau as well as Bureau recommendations for future research and grant funding.

The data collected will address a number of important research questions. The first research question pertains to understanding how the jurisdictions' evaluations have addressed the issue of measuring well-being. The rest of the research questions are focused on understanding practice- and systems-level changes within the child welfare service systems. Research questions are provided in Appendix A. One Web-based survey (the Web-Based Survey) and two telephone surveys (the Measuring Well-Being Telephone Survey and Practice- and Systems-Level Change Telephone Survey) will be conducted by the contractor. The three surveys will enable the Children's Bureau to gain a collective understanding of the waiver demonstration experience across jurisdictions in a minimally burdensome way. Prior to the administration of the Web-Based Survey and one of the telephone surveys, the contractor will request from the waiver jurisdictions contact information for possible survey respondents using survey sampling forms.

The three surveys include the Web-Based Survey and two topic-focused telephone surveys. The Web-Based Survey will be administered to jurisdiction representatives and evaluators and will look broadly at the implementation of waiver demonstrations and corresponding changes in child welfare policy, practice, and financing. The quantitative nature of the Web-Based Survey will enable rapid data analysis and reporting. The two topic-focused telephone surveys include: (1) a telephone survey of waiver jurisdiction evaluators who are focused on measuring well-being and (2) a second telephone survey of waiver jurisdiction representatives and evaluators that is focused on understanding practice- and systems-level changes within the child welfare service systems. The qualitative nature of the telephone surveys will enable the Children's Bureau to obtain more detailed information to ensure a comprehensive understanding of measuring well-being and practice- and systems-level changes in the jurisdictions.

3. Use of Improved Information Technology and Burden Reduction

The Web-Based Survey questions will be targeted to collect information not provided by existing sources. The survey will not include items that seek to gather information that can be obtained from other sources to minimize the time survey respondents spend on the activity. The majority of response options to each survey question in the Web-Based Survey will be quantitative (e.g., choose one), and the opportunity for open-ended responses will be provided as appropriate. Skip patterns will be used, so respondents will spend time only on the questions most applicable to them. The Web-Based Survey will be administered electronically with 24-hour-a-day access for approximately 4 weeks so respondents can respond at their convenience as well as easily and rapidly. Respondents are expected to have the capabilities to access the Web link to the survey.

The two topic-focused telephone surveys will be used to obtain more detailed information on measuring well-being and understanding practice- and systems-level changes within the child welfare service systems. It is not appropriate to use computer-based interviewing given the nature of the interviews. Questions will be targeted to collect information not provided by existing sources. The responses will be qualitative in nature. Skip patterns will be used, so respondents will spend time only on the questions most applicable to them. Interviews will be scheduled with the respondents to minimize the disruption on daily activities.

4. Efforts To Identify Duplication and Use of Similar Information

The proposed instruments have been developed and revised to address potential overlap with data being collected in the evaluations conducted in each jurisdiction. They have also been designed to be completed in the shortest amount of time possible by the fewest number of respondents while eliciting the necessary information. There is no similar information available that addresses the measurement of well-being and the questions regarding fiscal flexibility and practice- and systems-level change.

5. Impact on Small Businesses or Other Small Entities

The full range of information will be requested of all respondents. Organizational size will not affect the relevance of particular questions. Efforts are in place to minimize respondent burden, regardless of organizational size, for each of the described data collection activities. Information being requested has been held to the minimum sufficient to address the intended research questions.

6. Consequences of Collecting the Information Less Frequently

This is a one-time project. If the collection is not conducted, CB will not have access to this type of information from the waiver jurisdictions, which will be detrimental to any efforts to plan or conduct future work related to the Title IV-E Child Welfare Waiver Demonstrations or make recommendations for future research and grant funding.

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

There are no special circumstances associated with this data collection.

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

No requests were received from the general public for copies of the proposed information collection instruments following the publication of the notice that appeared in the Federal Register, Volume 81, Number 114, Tuesday, June 14, 2016, pages 38709–38710. In addition, no comments were received. A copy of this notice is included as Appendix B.

Direct stakeholders were provided with a number of opportunities to review the proposed instruments and to contribute to their development throughout the design phase of the National Study. Appendix C identifies the seven individuals from the waiver jurisdictions and Federal staff who reviewed and offered written comments on the data collection approach and the survey instruments. The contractor has made an effort to be responsive to stakeholders' comments whenever possible and has used their feedback in revising the data collection instruments. Wording and phrasing changes were made to each of the instruments to improve readability and understanding. The surveys were also pilot-tested with a separate group of individuals who were knowledgeable about the subject matter and who served in positions similar to the potential respondents. The Web-Based Survey was pilot-tested with four individuals from the early

implementing jurisdictions not included in the National Study. Similarly, the Measuring Well-Being Telephone Survey was pilot-tested with two different individuals from the same group of jurisdictions. Finally, the Practice- and Systems-Level Change Telephone Survey was pilot-tested with two individuals from jurisdictions not included in data collection for the survey. Following the pilot tests, the survey instruments were refined to minimize burden and improve utility.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be provided to respondents for completing this information collection.

10. Assurance of Confidentiality Provided to Respondents

Information will be kept private to the extent permitted by law. No assurances of complete confidentiality are provided to respondents. However, respondents will be informed of all planned uses of the data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. The contractor will not disclose any individual-level survey or interview information to waiver jurisdictions or CB. Information will not be published that could be used to identify individual respondents. All Web-based and telephone survey results will be analyzed and reported in aggregate for all reports, presentations, and publications. The contractor will carefully evaluate all survey analyses to ensure that no individual may be identified in these documents. All contractor staff members sign an employee agreement on ideas, inventions, and confidential information as a condition of employment, and access to all survey information collected will be limited to immediate project team members. CB does not require access to any personally identifiable data.

11. Justification for Sensitive Questions

There are no questions or requirements of a sensitive nature contained in the survey instruments described herein.

12. Estimates of Annualized Burden Hours and Costs

Having applied hourly wage estimates to burden hours in each respondent category, the current annual cost to the respondents is as follows: (1) \$302.78 for the Web-Based Survey Sampling Form, (2) \$3,062.49 for the Web-Based Survey, (3) \$940.93 for the Measuring Well-Being Telephone Survey, (4) \$128.45 for the Practice- and Systems-Level Change Telephone Survey Sampling Form, and (5) \$2,260.94 for the Practice- and Systems-Level Change Telephone Survey. The total annual cost for respondents in 2017, the only year of data collection, is \$6,695.59. The average hourly wages were taken from the U.S. Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May 2015.

The Annual Burden Estimates for the data collection instruments are outlined in Exhibit A-12. The estimated total annualized burden is 177.25 hours. The total burden for the Web-Based Survey and its companion sampling form is 90.75 hours. The total burden for the Measuring Well-Being Telephone Survey is 23 hours. The total burden for the Practice- and Systems-Level Change Telephone Survey and companion sampling form is 63.5 hours.

The current burden estimates differ from those reported in the Federal Register, Volume 81, Number 114, Tuesday, June 14, 2016, pages 38709–38710. At the time of the Federal Register notice, it was anticipated that 60 respondents would be administered the Measuring Well-Being Telephone Survey. However, after further consideration, it has been determined that interviewing a single evaluator from each of the 23 jurisdictions measuring child and caregiver well-being is sufficient.

Exhibit A-12. Annual Burden Estimates

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
<i>Web-Based Survey Sampling Form</i>	25	1	0.33	8.25
<i>Web-Based Survey</i>	250	1	0.33	82.5
<i>Measuring Well-Being Telephone Survey</i>	23	1	1	23
<i>Practice- and Systems-Level Change Survey Sampling Form</i>	14	1	0.25	3.5
<i>Practice- and Systems-Level Change Telephone Survey</i>	60	1	1	60
Estimated Total Annual Burden Hours				177.25

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

No additional cost burden will apply for respondents or record keepers.

14. Annualized Cost to the Federal Government

The associated costs for developing, administering, and analyzing the surveys are outlined in Exhibit A-14. The annual cost to the Federal Government to develop, administer, and analyze the instruments is \$100.38 for the Web-Based Survey Sampling Form, \$45,479.85 for the Web-Based Survey, \$32,652.20 for the Measuring Well-Being Telephone Survey, \$100.38 for the Practice- and Systems-Level Change Telephone Survey Sampling Form, and \$58,890.58 for the Practice- and Systems-Level Change Telephone Survey. The activities for the two survey sampling forms and three surveys occur within the same 12-month period, so the total annualized cost to the Federal Government is \$137,223.39.

Exhibit A-14. Estimated Annualized Costs for Survey Development, Administration, and Analysis

Instrument	Activities	Staff Time (Hours)	Total Cost
<i>Web-Based Survey Sampling Form</i>	Survey Development	0.33	\$100.38
	Survey Administration	0.33	
	Survey Analysis	0.33	
<i>Web-Based Survey</i>	Survey Development	130	\$45,479.85
	Survey Administration	80	
	Survey Analysis	180	
<i>Measuring Well-Being Telephone Survey</i>	Survey Development	130	\$32,652.20
	Survey Administration	48	
	Survey Analysis	102	
<i>Practice- and Systems-Level Change Survey Sampling Form</i>	Survey Development	0.33	\$100.38
	Survey Administration	0.33	
	Survey Analysis	0.33	
<i>Practice- and Systems-Level Change Telephone Survey</i>	Survey Development	130	\$58,890.58
	Survey Administration	120	
	Survey Analysis	255	
Estimated Total Annual Costs			\$137,223.39

15. Explanation for Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

The information collection described in this request is descriptive.

Tabulation

Frequency and proportion distributions will be calculated to generate summaries for the Web-Based Survey. Distributions will likely be produced using Excel. Content analysis will be conducted on open-ended survey items and will entail systematic coding and thematic analysis. ATLAS.ti or a similar software program will be used for the qualitative analysis.

Publication and Project Timetable

The findings from each of the information collection activities will be summarized in a separate report as well as in the final report for the National Study due to CB in December 2018. The Web-Based Survey report will be an internal document for CB, while the reports for the remaining surveys will be distributed to the jurisdictions and disseminated on CB Web sites. It is anticipated (based on OMB approval) that the information collection activities will be administered, analyzed, and reported on during the following periods:

- *Web-Based Survey*: Administration and analysis between January 1 and March 31, 2017; report development and final submission between April 1 and June 30, 2017.
- *Measuring Well-Being Telephone Survey*: Administration and analysis between January 1 and June 30, 2017; report development and final submission between July 1 and September 30, 2017.
- *Practice- and Systems-Level Change Telephone Survey*: Administration and analysis between January 1 and September 30, 2017; report development and final submission between October 1 and December 31, 2017.

17. Reason(s) Display OMB Expiration Date Is Inappropriate

The OMB expiration date for the information collection will appear on the instruments as will the OMB control number. In addition, a statement will appear on all instruments that describes the public reporting burden and explains that an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

18. Exception to Certification for Paperwork Reduction Act Submissions

No exception is requested to the certification statement identified in Item 19, “Certification for Paperwork Reduction Act Submissions,” on Form OMB 83-I.