

THE SUPPORTING STATEMENT

Specific Instructions

A. Justification

1. Circumstances Making the Collection of Information Necessary

The John H. Chafee Foster Care Program for Successful Transition to Adulthood (42 U.S.C. 677, as amended by Pub. L. 115–123, the Family First Prevention Services Act within Division E, Title VII of the Bipartisan Budget Act of 2018) requires State child welfare agencies to collect and report to the Administration for Children and Families (ACF) data on the characteristics of youth receiving independent living services and information regarding their outcomes.

The regulation implementing the National Youth in Transition Database (NYTD), listed in 45 CFR 1356.80, contains standard data collection and reporting requirements for States to meet the law’s requirements. ACF uses the information collected under the regulation to track independent living services, assess the collective outcomes of youth, and assess performance with regard to those outcomes, consistent with the law’s mandate. There are two information collection instruments associated with this request: the **Data File** and the **Youth Outcome Survey**.

2. Purpose and Use of the Information Collection

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

3. Use of Improved Information Technology and Burden Reduction

States submit the NYTD Data File to ACF in an electronic format. We decided to use Extensible Markup Language (XML) for file transmission consistent with the E-Government Act of 2002 (Public Law 107-347) based, in part, on public responses we received during the NYTD rule-making process. ACF released its final technical specifications for the transmission of NYTD data files in [NYTD Technical Bulletin #1](#). For the NYTD Youth Outcome Survey, many states have opted to collect these data using web-based technologies

designed to ease the burden related to collecting and reporting outcomes data on young people. We believe that web-based technologies have great potential to assist states in locating and engaging youth and young adults in the NYTD Youth Outcome Survey in an efficient and cost-effective way. While we have not required a specific method states must use to collect the survey data or track youth that leave foster care, we continue to provide technical assistance and other guidance to states on appropriate and allowable methods for locating youth and administering the survey using technology.

4. Efforts to Identify Duplication and Use of Similar Information

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

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

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

5. Impact on Small Businesses or Other Small Entities

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

6. Consequences of Collecting the Information Less Frequently

This data collection is mandated by law, therefore we would be out of compliance with the statutory requirements if we did not collect independent living service and youth outcome information. In the regulation, we require that states submit NYTD data to ACF every six

months, which is the same reporting frequency as AFCARS. We believe that any less frequent reporting may increase the risk of states reporting inaccurate or missing data. Further, we chose a semi-annual reporting period to preserve our ability to analyze NYTD data along with AFCARS data for the same youth. The six-month report period for AFCARS is integral to a number of ACF priorities and legislative requirements.

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

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

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

In response to the Proposed Information Collection Activity Comment Request, published in the Federal Register on July 26, 2018 (83 FR 35488), we received one public comment from a state agency that reports NYTD data. The commenter was generally positive about the utility of NYTD data and offered suggestions for improving technical assistance.

For example, they described NYTD as a practical means of collecting quality and relevant outcomes data that agencies can use to inform program design, service delivery and state-wide collaboration. However, they expressed interest in receiving greater federal assistance around developing data sharing agreements and using long term youth engagement strategies that can help agencies improve response rates for older youth.

We appreciate that state participants acknowledge the benefits of the NYTD outcomes data collection effort and understand their desire for additional technical assistance resources. It has been our priority to engage states around best practices and to demonstrate how NYTD data can be analyzed in conjunction with other program data to better assess the frequency and types of services that lead to improved outcomes.

To further aid our state users, we host a NYTD Help Desk where technical specialists are available to assist with NYTD data collection related issues. We also partner with youth engagement specialists who are able to help states implement youth engagement strategies that improve youth participation. Additionally, we are also able to provide direct and onsite guidance during NYTD Reviews and subsequently during performance improvement plan implementation. It is our goal to continue to strengthen our technical assistance efforts to support states in their work with transition aged youth.

9. Explanation of Any Payment or Gift to Respondents

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

10. Assurance of Confidentiality Provided to Respondents

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

11. Justification for Sensitive Questions

Congress specifically required in law that states collect outcome information on issues of a sensitive nature including rates of non-marital childbirth, incarceration and high risk behaviors. Therefore, we require states to pose questions in the youth survey that ask about these areas of a youth’s life. The survey is voluntary and, as noted in Item #10, we expect states to obtain youth or parental consent, as appropriate.

12. Estimates of Annualized Burden Hours and Costs

This information collection will be comprised of:

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

Annual Burden Hour Estimates for the NYTD, FY 2019

The following are burden hour estimates for FY2019 and beyond. Burden hour estimates were formulated for each year of our three year cohort collection period using historic data as the basis. The methodology for developing these estimates are outlined below in steps 1 – 3. An annualized burden estimate was created by taking the average of those three years as a representation of the average estimated burden required of states participating in data collection efforts. While there are no changes in the number of questions or frequency of the collection, we are using the updated annualized estimate in the table below to cover the period corresponding to this ICR, FY 2019 – FY 2021.

- 1) FY 2019: With regard to the **Data File** instrument, we estimate that there will be approximately 2,100 youth who receive services annually per state. Each state will expend on average 30 minutes (0.5 hours) to collect the services, demographics and characteristics information from those youth resulting in an hour burden of 1,050 per

state each report period. In FY 2019, states will collect outcomes information on the follow-up population of 19-year-olds in NYTD Cohort 2. The age 19 follow-up population is a subset of the NYTD baseline population as it includes only youth who participated timely in the survey at age 17. Pursuant to the NYTD regulation, some States may also opt to collect outcomes information on a sample of 19-year-olds instead of the complete follow-up population. For these reasons, our estimate for the age 19 follow-up population (12,000 nationally or 226 per state; with states surveying about half of this number each report period during FY 2019) will be much smaller than our estimate for the original age 17 baseline population. We are estimating 45 minutes (0.75 hours) for states to explain the purpose of the survey to the youth and to record the outcomes information that will be reported in the data file. This results in a burden estimate of 127 hours per state per report period (“per response”). In addition, we are estimating tracking burden during this year as we expect most 19-year-olds to have exited foster care. Based on previous studies involving locating hard to reach youth populations (Meyers, 2002) and estimates from the Multisite Evaluation of Foster Youth Programs, we are estimating states making up to 12 contacts in FY 2019 to locate and engage a 19-year-old youth in the NYTD survey. Estimating 10 minutes per contact, we anticipate two burden hours for tracking 19-year-old youth in FY 2016 or 226 burden hours per state per report period. That total burden hour estimate for the Data File instrument is 1,403 hours per response. With regard to the **Youth Outcome Survey** instrument, we are estimating 0.5 burden hours for each youth to listen to the state’s survey instructions and to provide responses to the survey questions, resulting in a total of 6,000 burden hours.

- 2) FY 2020: With regard to the **Data File** instrument, we have estimated the same 1,050 hour burden per State per report period associated with collecting and reporting youth independent living services, demographics and characteristics information. In FY 2020, States will begin surveying a new cohort of youth starting with outcomes data collection for on another baseline population of 17-year-olds in foster care (Cohort 3). We are estimating 45 minutes (0.75 hours) for States to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. We estimate that there will be on average 472 17-year-old youth in foster care per State in FY 2020, resulting in approximately 226 burden hours to record this information each report period (assuming that States survey half of the baseline population of 17-year-olds in each of the two semi-annual reporting periods in FY 2020). We are not estimating tracking burden during this year for the baseline population as we expect States to know the whereabouts of the 17-years-olds still in foster care. However, we are estimating tracking burden during FY 2020 for the follow-up population as we expect States to maintain contact with this population between survey rounds at ages 19 and 21. In the intervening year between survey rounds, we estimate that States will make three contacts in FY 2020 to maintain a current address and contact information for such youth in each State’s NYTD follow-up population or follow-up population sample (226 youth per State on average). Estimating 10 minutes per contact, we anticipate 0.5 burden hours for tracking 19-year-old youth in FY 2020 or 118 burden hours per State per report period. The

burden estimate for the Data File instrument is 1,394 per response. With regard to the **Youth Outcome Survey instrument**, we are estimating that it will take the estimated 25,000 youth nationwide approximately 30 minutes (0.5 hours) to complete the survey, resulting in a total of 12,500 burden hours.

- 3) FY 2021: With regard to the **Data File** instrument, we have estimated the same 1,050 hour burden per state per report period associated with collecting and reporting youth independent living services, demographics and characteristics information. In FY 2021, states will collect outcomes information on the Cohort 2 follow-up population of 21-year-olds. This estimate includes burden hours for this same population at age 19 (12,000 nationally or 226 per state; with states surveying about half of this number each report period during FY 2021). We are estimating 45 minutes (0.75 hours) for states to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. This results in a burden estimate of 99 hours per state per report period. In addition, we are estimating tracking burden during this year as we expect most 21-year-olds in Cohort 2 to have exited foster care. We are estimating states making 10-12 contacts in FY 2021 to locate and engage 21-year-old youth in the NYTD survey. Estimating 10 minutes per contact, we anticipate two burden hours for tracking 21-year-old youth in FY 2021 or 226 burden hours per state per report period. Similarly, we are estimating tracking burden during FY 2021 for Cohort 3 youth (surveyed in FY 2020 at age 17) as we expect states to maintain contact with this population between survey rounds at ages 17 and 19. In the intervening year between survey rounds, we estimate that states will make three contacts in FY 2021 to maintain a current address and contact information for such youth (once again, using 226 youth per state as an estimate). Estimating 10 minutes per contact, we anticipate 0.5 burden hours for tracking 18-year-old youth in FY 2021 or 344 burden hours per state per report period (We have combined burden hours for 2020 and 2021 to reflect tracking for Cohorts 2 and 3). The total burden hour estimate for the Data File instrument is 1,493 per response. With regard to the **Youth Outcome Survey** instrument, we are estimating 0.5 burden hours for each youth to listen to the state’s survey instructions and to provide responses to the survey questions, resulting in a total of 7,000 burden hours.

Annualized Burden Estimate.

<i>Instruments (subcomponents)</i>	<i>Number of respondents</i>	<i>Number of responses per respondent</i>	<i>Average burden per response (hrs)</i>	<i>Total burden hours (hrs)</i>
1. Data File	53	2	1,430	151,580
2. Youth Outcome Survey	16,333	1	0.5	8,167
TOTAL annualized burden estimate for both collections				159,747

Annualized Cost Estimates for the NYTD, FY 2019

Using \$34.00 per hour as an approximation for state worker hourly wages (Bureau of Labor Statistics, 2014) the costs associated with gathering the Youth Outcome Survey information

and preparing and submitting the NYTD Data File would be \$101,524 per state in FY2019 (1,493 burden hours per response x 2 responses per year x \$34.00 hourly wage). We are not estimating any costs to the youth who participate voluntarily in the NYTD Youth Outcome Survey.

Annualized cost estimates for NYTD.

<i>Instruments (subcomponents)</i>	<i>Total cost</i>
1. Data File	\$101,524
<i>FY 2019-21</i>	<i>\$101,524</i>
2. Youth Outcome Survey	\$0
<i>FY 2019-21</i>	<i>\$0</i>

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

We expect that on average business process costs, travel and training, process development, information technology (IT) operational and maintenance costs will be approximately \$250,000 per state per year. Because many of these costs can be matched at 50% Federal financial participation for a state that has a Comprehensive Child welfare Information System. (CCWIS, formerly SACWIS), we are estimating a cost burden of \$125,000 per state per year (or \$62,500 for each of the two responses per year). We do not expect that reporting for NYTD will require the purchase of additional hardware or other capital equipment. For IT system changes, the main costs are in software development and/or modification. We characterize these costs as minor, but we are aware of the impact the cost of implementation has on states. During the rule-making process, we received comments from states regarding anticipated start-up and annual costs that indicated our estimates are accurate. We are not estimating any other cost burden associated with the Youth Outcome Survey instrument because we are not estimating any costs to respondent youth and because costs associated with a State collecting survey data is captured as part of other IT system development costs in the Data File instrument (as shown below*).

Estimates of other total annual cost burden for reporting.

<i>Instruments</i>	<i>Cost per response</i>	<i>Responses per year</i>	<i>Number of respondents</i>	<i>Total cost burden for reporting</i>
1. Data File	\$62,500*	2	53	\$6,625,000
2. Youth Outcome Survey	\$0	1	16,333	\$0

We recognize that the reporting and record keeping burden is disproportionately higher for small states because they need to develop the same functionality as large states regardless of the number of youth reported. State costs are not affected by the number of youth in the reporting population or the number of reporting periods. We also recognize that county-administered states may face more challenges in implementation, but see no need to change

our cost burden estimates. Each state will have different costs depending on their populations of youth and the changes required in their information systems and business procedures to meet the requirements in the regulation.

14. Annualized Cost to the Federal Government

A federal NYTD system was developed and implemented in 2011 to receive, process and store NYTD data submitted by states. Currently, it is estimated to cost the federal government \$986,000 annually, to operate NYTD. These costs are associated with hosting NYTD on the ACF network and maintaining system related security protocols, such as the Authorization to Operate. Also included, is contractor support for system development, maintenance and technical specialists who staff our Help Desk to provide assistance to end users.

15. Explanation for Program Changes or Adjustments

A federal NYTD system was developed and implemented in 2011 to receive, process and store NYTD data submitted by states. Currently, it is estimated to cost the federal government \$986,000 annually, to operate NYTD. These costs are associated with hosting NYTD on the ACF network and maintaining system related security protocols, such as the Authorization to Operate. Also included, is contractor support for system development, maintenance and technical specialists who staff our Help Desk to provide assistance to end users. Explanation for Program Changes or Adjustments

We are not proposing any material changes to the collection instruments, instructions, or to the uses of the information collection currently approved by OMB. However, we are making minor adjustments to the burden hours to reflect the use of historic data to arrive at a more accurate depiction of effort. Additionally, these burden hours also include one additional agency that will begin reporting NYTD data, since the U.S. Virgin Islands was recently approved to receive the Chafee grant.

16. Plans for Tabulation and Publication and Project Time Schedule

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

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

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

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement.