

SUPPORTING STATEMENT  
PREVENTION SERVICES DATA COLLECTION

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

Section 471(e) of the Social Security Act (the Act)(42 U.S.C. 671) as amended by Public Law 115-123 allows state and tribal child welfare agencies to receive reimbursement for some of the costs of providing prevention services to certain children and their parents or kin caregivers. The Act requires state and tribal child welfare agencies that provide such services to collect and report to the Administration for Children and Families (ACF) information on children receiving the prevention and family services and programs.

States and tribes must report<sup>1</sup>:

- The specific services or programs provided,
- The total expenditures for each of the services or programs provided,
- The duration of the services or programs provided, and
- If the child was identified in a prevention plan as a candidate for foster care:
  - the child's placement status at the beginning, and at the end, of the 12 month period that begins on the date the child was identified as a candidate for foster care in a prevention plan; and
  - whether the child entered foster care during the initial 12 month period and during the subsequent 12 month period; and
- Basic demographic information (e.g., age, sex, race/Hispanic Latino ethnicity).

The Children's Bureau (CB) anticipates that half or less of the tribes and states will choose to provide these prevention services in the first years of the program availability, but that number will increase over time.

**2. Purpose and Use of the Information Collection**

The data collected will inform federal policy decisions, program management, and responses to Congressional and Departmental inquiries. Specifically, the data will provide information about the use and availability of prevention services to children to prevent the need for foster care placement. The data will contain personally identifiable information (date of birth and race/ethnicity).

**3. Use of Improved information Technology and Burden Reduction**

Title IV-E agencies will transmit data directly to the CB in electronic format. Federal Information Security Management Act (FISMA) approved software is used that allows for a secure direct communication between the title IV-E agencies and the Federal Government.

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<sup>1</sup> Section 471(e)(4)(E) of the Social Security Act

#### **4. Efforts to Identify Duplication and Use of Similar Information**

No similar data are available.

#### **5. Impact on Small Business or Other Small Entities**

This collection will not have an adverse impact on small entities. Respondents are state and tribal child welfare agencies.

#### **6. Consequences of Collecting the Information Less Frequently**

In order to reduce the burden on title IV-agencies, and still gather data on a timely basis, we are requiring a semi-annual reporting period. Less frequent data collection would inhibit the timely use of the information by CB to inform federal policy decisions, program management, and responses to Congressional and Departmental inquiries.

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

There are no special circumstances.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on February 4, 2019, Volume 84, Number 23, page 1468, and provided a sixty-day period for public comment. During the notice and comment period, we received nine comments from states and an advocacy agency.

Several commenters expressed concern that the total burden hours was likely to be higher than our initial estimate, in part due to the need for reprogramming of existing systems and increased communication and coordination between agencies that do not have formal methods of communication. We based our estimate of the burden on calculations related to the burden estimate for the Adoption and Foster Care Analysis and Reporting System. No commenter provided any specifics with which we could revise our estimate.

Several commenters commented on the costs of computer programming that will be added by this new program. We acknowledge that there may be additional costs related to providing this new service. Federal financial participation is available in allowable costs associated with the new program.

Additionally, several commenters expressed concern that the draft instrument provided with the first notice was insufficiently detailed to allow a full understanding of the program requirements. We are issuing a revised instrument that we hope will provide more detail and explanation.

Other commenters expressed concern that this information collection would require the collection and reporting of duplicate information available in other information collections such as AFCARS and NCANDS. The exact set of information that is statutorily required for this program does not exist elsewhere. Many of the children that title IV-E agencies will serve in this program are not in foster care and therefore, not reported in AFCARS. While certain information is reported in each data set, the information is collected once (i.e., date of birth, race/Hispanic Ethnicity and sex). Additionally, title IV-E of the Social Security Act requires AFCARS be regulated and there are statutory penalties associated with AFCARS. NCANDS is voluntary and does not include all of the information Congress mandated related to this program.

### **9. Explanation of Any Payment or Gift to Respondents**

There are no payments or gifts to respondents.

### **10. Assurance of Confidentiality Provided to Respondents**

We will protect respondents' information to the extent allowed by Federal law. Additionally, the state or tribe will assign an encrypted record number. Only the sending agency will know this number.

### **11. Justification for Sensitive Questions**

There are no questions of an inherently sensitive nature included in the data collection.

### **12. Estimates of Annualized Burden Hours and Costs**

| Instrument                          | Number of Respondents | Annual Number of Responses per Respondent | Average Burden Hours per Response | Annual Burden Hours |
|-------------------------------------|-----------------------|---|-----------------------------------|---------------------|
| Prevention Services Data Collection | 20                    | 2   | 31                                | 1240                |

The job codes are Computer Information and Systems Managers (11-3021) with an average hourly wage of \$71.99, Computer and Mathematical Occupations (15-0000) with an average hourly wage of \$43.18, Office and Administrative Support Occupations (43-000) with an average hourly wage of \$18.24, Social and Community Service Managers (11-9151) with an average hourly wage of \$33.91, and Community and Social Service Operations (21-0000) with an average hourly wage of \$23.10. We reviewed 2017 Bureau of Labor Statistics data. ACF averaged these wages to come to an average labor rate of \$38.04. In order to ensure we took into

account overhead costs associated with these labor costs, ACF doubled this rate (\$76.18). (<https://www.bls.gov/opub/mlr/2017/home.htm>). Therefore, the costs to respondents is estimated to be \$94,463.20 (1,240 hours x \$76.18).

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

States and tribes will utilize existing electronic case record systems (computers) to record and collect information pertaining to the case work associated with children and youth receiving prevention services. The cost of collecting and submitting data to the CB for states and tribes is subsumed under the agencies' expenses for personnel.

### **14. Annualized Cost to the Federal Government**

There is no monetary cost to the federal government.

| Item   | Hours/Activities        | Avg. Cost per hour | Annual Total Cost |
|--|-------------------------|--------------------|-------------------|
| Operation and analysis of Prevention Services Database | 10 hr/week per employee | \$40.00            | \$83,200          |

The average annual Federal costs associated with operation of the database is based on 25% of one full-time federal employee and 25% of one full-time contract employee. ACF expects costs to rise as more states and tribes participate in the program over time. In order to take ensure we took into account overhead associated with these labor costs, ACF doubled the estimated hourly rate (\$80)

### **15. Explanation for Program Changes or Adjustments**

This is a new request.

### **16. Plans for Tabulation and Publication and Project Time Schedule**

CB will make the information available annually to the public by publishing on our website at <https://www.acf.hhs.gov/cb>.

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

Not applicable.

### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions.