

**CCWIS Data Collection:
Automated Functions List Update &
Data Quality Plan Update**

**OMB Information Collection Request
0970 - 0463**

**Supporting Statement Part A -
Justification**

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Submitted By:
Children's Bureau
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT A – JUSTIFICATION

Summary

1. Circumstances Making the Collection of Information Necessary

The statute at 42 U.S.C. 674(a)(3)(C) and (D) provides the authority for title IV-E funding for the planning, design, development, installation, operation, and maintenance of an optional child welfare data collection and information retrieval system and the requirements a title IV-E agency must meet to receive a more favorable cost allocation for federal financial participation (FFP). The statute at 42 U.S.C. 674(c) further specifies the expenditures eligible for FFP. In response to these laws, the Administration for Children and Families (ACF) published regulations at 45 CFR 1355.50 – 57 in 1993 providing states with enhanced funding to build a single comprehensive system supporting all child welfare case management activities for public and private child welfare workers in the state. In response to 42 U.S.C. 679c(b) ACF amended these regulations in 2012 to apply to an Indian tribe, tribal organization, or tribal consortium (tribe) that elect to operate a program under a plan approved by the Secretary under section 671.

Child welfare practice and technology changed considerably since the regulations were published in 1993. To address these changes, ACF published the Comprehensive Child Welfare Information System (CCWIS) Final Rule on June 2, 2016 with an effective date of August 1, 2018. This final rule removes the requirement for a single comprehensive system. With this flexibility, title IV-E agencies can build less expensive, modular based, child welfare information systems that more closely mirror their practice models while supporting quality data. Each agency may determine the size, scope, and functionality of their CCWIS. For example, a tribe may use this flexibility to build a smaller system at a reasonable cost.

To help title IV-E agencies implement these more flexible requirements while ensuring appropriate Federal oversight, the final rule specified three new reporting requirements:

- The initial Automated Function List (submitted when the agency decided to implement a CCWIS Project pursuant to 1355.52(i)(1)(ii))
- The initial Data Quality Plan (submitted within a year of the agency's decision to implement a CCWIS Project pursuant to 1355.52(d)(5))
- The Notice of Intent (submitted only if the planned CCWIS project fell under Advance Planning Document thresholds pursuant to 1355.52(i)(1))

OMB approval of this original CCWIS information collection (OMB #0970-0463) designed for start-up CCWIS projects is no longer needed as 46 states and the District of Columbia have notified CB of their intention to implement a CCWIS and submitted the information. Although some of the remaining states and some title IV-E tribal agencies may opt to build a CCWIS in the future and submit the required information listed above, it is our assessment that this number will not reach the Paperwork Reduction Act (PRA) threshold of ten or more persons required for OMB approval.

Therefore, ACF is revising the data collection originally approved under OMB #0970-0463.

The proposed CCWIS information collection revisions are designed to collect information required by the CCWIS regulations for ongoing CCWIS projects. The proposed revisions amend the first and second components, and remove the third component:

- Automated Function List updates (annual submission during the life of a CCWIS project pursuant to 1355.52(i)(2))
- Data Quality Plan updates (annual submission during the life of a CCWIS project pursuant to 1355.52(d)(5))

2. Purpose and Use of the Information Collection

i) Automated functions list updates

Under the final rule, title IV-E agencies may request the CCWIS cost allocation (§1355.57(e)) for only those automated functions of a CCWIS that meet specific requirements. The automated function list submitted by each title IV-E agency must indicate if each automated function complies with the specified requirements.

Title IV-E agencies must re-submit their automated function list annually to ACF as part of an Annual or Operational APD. The resubmission will report any changes in compliance with the specified requirements. The title IV-E agency may also add or delete automated functions from the list. ACF will use the resubmission to determine the automated functions that continue to qualify for CCWIS cost allocation.

ii) Data quality plan updates

The final rule provides title IV-E agencies with the flexibility to obtain required data from multiple systems. Since each system may collect data differently, maintaining consistent quality data needed to effectively serve child welfare clients is more challenging. Therefore the final rule requires title IV-E agencies to submit a CCWIS data quality plan to ensure data quality.

The CCWIS data quality plan describes the title IV-E agency's comprehensive strategy to meet the data quality requirements defined at § 1355.52(d)(1) – (3) and the current quality of CCWIS required data. Agencies re-submit the updated plan annually to ACF as part of their Annual or Operational APD. ACF uses the plan to monitor compliance with CCWIS data quality requirements.

3. Use of Improved Information Technology and Burden Reduction

ACF encourages title IV-E agencies to submit the information collection electronically (e.g., as email attachments) because:

- it is consistent with ACF’s guidance to submit other documents, such as APDs, electronically; and
- it is more efficient than mailing multiple hardcopies of documents and thereby reduces the burden on agencies.

To further reduce the reporting burden, ACF encourages agencies to:

- include information automatically generated by the CCWIS in the information collection, if appropriate (such as including CCWIS data quality reports with the data quality plan);
- update the most recent version of the automated function list and data quality plan with relevant information rather than develop new reports for each submission; and

4. Efforts to Identify Duplication and Use of Similar Information

i) Automated functions list updates

Submitting an updated automated function list with the Annual or Operational APD is a CCWIS requirement. As described in section 3, to further reduce the reporting burden, ACF encourages agencies to update the most recent version of the automated function list with relevant information rather than develop a new report for each submission.

ii) Data quality plan updates

Submitting an updated data quality plan to ACF with the Annual or Operational APD is a CCWIS requirement. As described in section 3, ACF encourages agencies to update the most recent version of the data quality plan rather than develop a new report for each submission. As also noted in section 3, to further reduce the reporting burden, ACF recommends that agencies include information automatically generated by the CCWIS in the information collection, if appropriate (such as including CCWIS data quality reports with the data quality plan).

Additionally, many title IV-E agencies have plans to monitor, control, and improve data quality using processes and tools such as:

- data governance policies that specify data quality requirements;
- data quality teams to monitor data quality; and
- automated reports to survey data quality and identify problems.

ACF encourages title IV-E agencies to incorporate existing plans, processes and tools into the data quality plan. Leveraging existing resources will eliminate duplicate efforts and lessen the reporting burden.

5. Impact on Small Businesses or Other Small Entities

This information collection is only required of title IV-E agencies electing to build an optional CCWIS. It does not have an impact upon small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

i) Automated functions list updates

The CCWIS final rule requires that the title IV-E agency include the updated automated functions list with the Annual or Operational APD. The required submissions are critical information for ACF in determining appropriate annual funding levels and application of the CCWIS cost allocation. Without this annual submission, the title IV-E agency may be at risk of submitting inaccurate claims for FFP.

ii) Data quality plan updates

The CCWIS final rule requires the annual submission of the updated data quality plan. The data quality plan is necessary for monitoring the quality and timeliness of data being collected by CCWIS. Without this annual submission, the data quality of required federal reports submitted by IV-E agencies may be reduced and ACF would be required to conduct more frequent on-site monitoring reviews.

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

The collection of information does not involve any 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 May 3, 2019, Volume 84, Number 86, page 19079, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

9. Explanation of Any Payment or Gift to Respondents

No payments, other than FFP, will be made to title IV-E agencies for the planning, design, development, installation, operation and maintenance of a CCWIS.

10. Assurance of Confidentiality Provided to Respondents

The information collected is not considered confidential. No Personally Identifiable Information is requested or provided. No assurance of confidentiality is provided to respondents.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Annual Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Automated Function List Updates §1355.52(i)(2)	55	1	10	550	\$90.76	\$49,918
Data Quality Plan Updates §1355.52(d)(5)	55	1	40	2,200	\$90.76	\$199,672
Annual Burden Hours Estimate:				2,750	Annual Cost Estimate:	\$249,590

We applied the following assumptions and estimates for the reporting burden estimates:

i) Automated functions list updates

We assume that all 46 states plus the District of Columbia that are implementing a CCWIS will submit automated functions list updates annually as required by the CCWIS regulations. We estimate, based on previous experience, that an average of eight states will annually submit corrections to their automated function list updates, which results in a total estimate of 55 respondents (47 [46 states plus the District of Columbia] + 8 state revisions).

We are applying the 10 hour burden hour estimate originally made for the completion of the initial automated functions list to the automated functions list updates. This estimate accounts for the extra time agencies may need for analysis and information gathering prior to completing the automated functions list update.

We multiplied our estimate of 10 burden hours by 55 respondents to arrive at an annual burden estimate of 550 hours (10 burden hours x 55 respondents) for the automated function list updates requirement.

ii) Data quality plan updates

We assume that all 46 states plus the District of Columbia that are implementing a CCWIS will submit data quality plan updates annually as required by the CCWIS regulations. We estimate, based on previous experience, that an average of eight states will annually submit corrections to their data quality plan updates, which results in a total estimate of 55 respondents (47 [46 states plus the District of Columbia] + 8 state revisions).

We maintain the burden estimate for this activity at 40 hours per respondent for the submission of annual updates. This estimate accounts for the extra time agencies may need for analysis and information gathering prior to completing the data quality plan update.

We multiplied our estimate of 40 burden hours by 55 respondents to arrive at an annual burden of 2,200 hours (40 burden hours x 55 respondents) for the data quality plan updates requirement.

We used Bureau of Labor Statistics 2018 wage data to derive our estimated total annualized burden costs. We assume that staff with the job role of Management Analyst (13-111) with a mean hourly wage estimate of \$45.38 will be completing the automated function list updates and the data quality plan updates. We doubled this wage estimate (\$45.38 x 2 = \$90.76) in order to ensure we took into account overhead costs associated with labor costs. Our estimated annualized costs for each reporting requirement are calculated as:

- Formula: (Burden: Total Hours) x (Burden: Hourly Wage) = (Burden: Total Annualized Cost)
- Automated function list updates: 550 x \$90.76 = \$49,918
- Data quality plan updates: 2,200 x \$90.76 = \$199,672
- Total: 2,750 x \$90.76 = \$249,590

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

There are no other costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

Reporting Requirement	Annual Responses	Review Hours per Response	Total Federal Review Hours	Federal Hourly Wage	Annualized Cost to The Federal Government
Automated Function List Updates §1355.52(i)(2)	55	2 hours	110	\$107.70	\$11,847
Data Quality Plan Updates §1355.52(d)(5)	55	12 hours	660	\$107.70	\$71,082
Annual Total			770		\$82,929

We applied the following assumptions and estimates for determining the annualized cost to the federal government:

i) Automated functions list updates

We maintain the estimated federal review hours per response of two (2) hours per automated function list update from the original information collection. We multiplied

our estimate of two (2) hours per automated function list update by the 55 respondents to arrive at an annual Federal review of 110 hours for the automated function list update requirement.

ii) Data quality plan updates

We maintain the estimated federal review hours per response of 12 hours per data quality plan update from the original information collection. We multiplied our estimate of 12 hours per data quality plan update by the 55 respondents to arrive at an annual Federal review of 660 hours for the data quality plan update requirement.

Our estimated annualized reporting costs are based on the following:

- We use the hourly rate from the Office of Personnel Management’s Salary Table 2019-DCB, which provides an hourly rate of \$53.85 for a full-time Grade 13, Step 5 employee. We doubled this wage estimate ($\$53.85 \times 2 = \107.70) in order to ensure we took into account overhead costs associated with labor costs.
- We use the Annual Responses from section #12 above.
- Our estimates for Federal Review Hours per Response include time to review documents and for follow-up consultation with the submitting title IV-E agency.

Our estimated annualized costs for each reporting requirement are calculated as:

- Formula: (Annual Responses) x (Federal Review Hours per Response) x (Federal Hourly Rate) = (Annualized Cost to The Federal Government)
- Automated function list update: $55 \times 2 \times \$107.70 = \$11,847$
- Data quality plan update: $55 \times 12 \times \$107.70 = \$71,082$

15. Explanation for Program Changes or Adjustments

This is a request for revisions to the OMB #0970-0463 data collection to collect updated information from respondents as required by CCWIS regulations. Section #1 includes the explanation of the revisions.

16. Plans for Tabulation and Publication and Project Time Schedule

There are no plans to publish the information collection.

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

The Department is requesting that the OMB number and expiration date not be displayed as the final rule does not require a standardized form or template that title IV-E agencies must use.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.