

NATIONAL ADULT MALTREATMENT REPORTING SYSTEM

Supporting Statement for Paperwork Reduction Act Information Collection Request

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)]. The [Elder Justice Coordinating Council \(EJCC\)](#) recommended development of “a national adult protective services (APS) system based upon standardized data collection and a core set of service provision standards and best practices.”

Administered by the Administration for Community Living (ACL), the National Adult Maltreatment Reporting System (NAMRS) addresses the needs cited by the Elder Justice Act and EJCC. It collects information about APS agencies and their programs, as voluntarily submitted annually by states, the District of Columbia, and U.S. territories (referred to as “states” hereafter). After approval by the U.S. Office of Management and Budget in March 2017, the first year of NAMRS reporting was FFY 2016. As a result of ACL system enhancement grants and technical assistance by the Adult Protective Services Technical Assistance Resource Center (APS TARC), every state now participates and the number of states submitting detailed case data has increased every year.

2. Purpose and Use of the Information Collection

The Purpose of Information is to fulfill statutory requirements as described above in Section

1. 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 uses electronic submission to reduce the burden on the states. States use the NAMRS Website for uploading and validating data files online prior to submission. To satisfy federal security requirements, the NAMRS Website uses multifactor authentication (MFA). Once users access their accounts on the NAMRS Website for the first time, they must provide the phone number or email to receive their multifactor authentication code.

Data for the Agency Component and Key Indicators Component (see attachments A and B) are entered through an online data form accessed on the secure NAMRS Website. The NAMRS application displays helpful instructions for each question as data are entered 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 validates the data to identify errors and provides the ability for states to correct the data before submitting to ACL. This increases the consistency of validation, reduces the extent of validation conducted by technical staff, and lessens the need for resubmissions of data.

For archival purposes, a state can download its data in PDF format or Excel format. The final Agency Component, Key Indicators Component and Case Component data is securely saved and only accessible through the NAMRS Website by the submitting state, ACL, and its contractors. The data from previous reporting periods can be copied-forward to reduce the effort in the current year of reporting.

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 extract the appropriate data from their state systems into Extensible Markup Language (XML) format. States are provided with an XML Schema Definition (XSD) file as 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 assists state information technology (IT) units in preparing the data for submission and ensures that the basic file structure is correct. It provides immediate feedback before the file is submitted to ACL. These processes reduce the need for resubmissions by the states.

Once the Case Component XML file is completed, the state uploads the file through the NAMRS secure Website. Additional validation is automatically conducted by the system and the state receives electronic validation and summary data reports. States 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 an APS TARC liaison. The online validation reduces the number of resubmissions and the burden on the states and ACL.

The level of effort for subsequent reporting periods is greatly reduced since states can reuse the extraction program code developed for prior submissions. 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 NAMRS Website assists states in managing their data files and data submission documentation, thus further reducing the reporting burden in future years.

The APS TARC liaisons assist states through training, individual consultation on technical assistance needs, and review and approval of data submissions.

4. Efforts to Identify Duplication and Use of Similar Information

There is no other governmental or nongovernmental ongoing program that collects 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 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 Most recently, in October 1st, 2019 NORS revised its data collection to provide specific data for each case and complaint, moving from aggregated to case record data.²

The NORS differs in several ways from NAMRS. The NORS is limited to data collected on complaints concerning the care of residents in long term care facilities. 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. State Office of the State Long-Term Care Ombudsman programs submit annual data to the NORS; state APS programs submit data to NAMRS. While there is no duplication of effort, the definitions in NAMRS have been closely aligned with definitions in NORS, wherever applicable.

The Administration on Aging (AoA), administered by ACL, collects annual data on Title III and Title VII of the OAA. The [State Program Report](#) (SPR) (OMB No.: 0985-0008 expiration 6/30/2021) 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 current and future data analyses.

- The [National Survey of Older Americans Act Participants](#) (NSOAAP) 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.

¹ Accessed from https://ltombudsman.org/omb_support/nors/revised-nors-data-collection

² Accessed from <https://acl.gov/sites/default/files/programs/2018-05/Introduction%20to%20Revised%20NORS%20.pdf>

- 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](#) (NSOC) 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 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](#) (NSRCF), in 2010, the Centers for Disease Control and Prevention's National Center for Health Statistics (NCHS) conducted a study of residential care communities. The National Survey of Residential Care Facilities (NSRCF) 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](#) (NCI) was developed by the Human Services Research Institute (HSRI) and the National Association of State Directors of Developmental Disabilities Services and is used for quality management of state agencies. Forty-six states, 22 sub-state agencies and Washington D.C. participate (by 2018-19) 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 is 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 adult 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 typically have three months to submit data.
- *Requiring Respondents to Submit More than One Original and Two Copies.* States 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 archives each state's submission and provides the state with prior data submissions, as needed. States do 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 encrypts identifiers. No actual case or individual identifiers are submitted. No identifying data, such as name, address, or Social Security number, are collected. Each state ensures that its data meet a standard of encryption.
- *Requiring Respondents to Submit Trade Secrets or Other Confidential Information.* The NAMRS does not collect any data related to trade secrets. No identifying data on any individual is 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 is collected or maintained.

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

For the initial authorization, 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 nine states participating in the pilot effort. Also, every state and territory were contacted to participate in informational sessions and provide input. For this second authorization, the project team has three years of successfully working with states to provide NAMRS data.

A 60-day Federal Register notice published on November 12, 2019, in Federal Register Vol. 84, Page 218. A 30-day Federal Register notice published on February 26, 2020, in Federal Register Vol. 85, pages 11088-11089. There were no questions or comments submitted by the public during the 60-day Comment Period.

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

Confidentiality and integrity of data are maintained and monitored based on ACL’s system security authorization standards, procedures, and protocols. However, since no individual is identified in the data collection process, no assurance of confidentiality is needed. States are responsible for completely encrypting the record identification numbers. Technical assistance is provided to states on encryption methodologies; however, the final algorithms are retained only by the state. Therefore, there are no assurances of confidentiality.

11. Justification for Sensitive Questions

The data collection instruments do 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	4	224
Key Indicators Component	17	1	20	340
Case Component	36	1	100	3,600

Estimated Total Annual Burden Hours:

4,164

These decreased estimates from the initial OMB approval to collect data is based on the experience of states improving their capabilities in providing yearly NARMS data. Since the initial data collection in FFY2016, the state participation rate has been high and reached 100 percent in FFY2018. The number of states participating in each component is shown below:

Federal Fiscal Year	Agency Component	Key Indicator	Case Component
2016	54	20	24
2017	55	21	26
2018	56	20	31

The estimated annual burden below is based on the burden estimate assumptions developed in the pilot testing for NAMRS and revised based on three of experience and based on updated cost data.

To determine labor categories, in the pilot, states identified programmatic staff and IT staff to participate in NAMRS. 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). Estimates are calculated using the median hourly wage rates from Bureau of Labor and Statistics (BLS) information, annual cost of living increases, and using the review of salaries of state personnel. These total cost estimates are for states participating in the Agency Component, Key Indicator component, and Case Component.

Senior Program Managers and Program Associates (or equivalent): BLS occupation code: 11-3011 Administrative Services Managers median hourly wage rate \$52.32³

Senior IT managers and Software developers (or equivalents): BLS occupation code: 11-3021 Computer and Information Systems Managers median hourly wage rate \$ 69.79⁴

Across all respondents, for the Agency Component factoring in benefits and overhead for a total of:

- *Programmatic staff* total annual burden estimate 190 hours at \$104.64 per hour for a total of \$19,881.60
- *IT staff* total annual burden estimate 34 hours at \$139.58 per hour for a total of \$4,745.72

Across all respondents for the Key Indicators Component factoring in benefits and overhead for a total of:

- *Programmatic staff* total annual burden estimate 275 hours at \$104.64 per hour for a total of \$28,776

³ https://www.bls.gov/oes/current/naics4_551100.htm#11-0000

⁴ https://www.bls.gov/oes/current/naics4_551100.htm#11-0000

- *IT staff* total annual burden estimate 65 hours at \$139.58 per hour for a total of \$9,072.70

Across all respondents, for the Case Component factoring in benefits and overhead for a total of:

- *Programmatic staff* total annual burden estimate at 650 hours at \$104.64 per hour for a total of \$68,016
- *IT staff* total annual burden estimate 2,950 hours at \$139.58 per hour for a total of \$411,761

These totals result in an estimated total annual cost of \$542,253.02 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 do 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 totals \$852,663 as shown in the following table.

AGENCY	YEAR 1	YEAR 2	YEAR 3	AVERAGE
ACL GS13 ⁵	\$102,663	\$102,663	\$102,663	\$102,663
Contractor Staff	\$750,000	\$750,000	\$750,000	\$750,000
Total	\$852,663	\$852,663	\$852,663	\$852,663

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

15. Explanation for Program Changes or Adjustments

The annual burden estimate for 2017-2020 was 5,718 hours. The annual burden estimate for 2020-2023 is 4,164 hours. There is an adjustment decrease of -1,554 based on the experience of states improving their capabilities and efficiencies in providing yearly NARMS data since FY2016.

⁵ <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/20Tables/html/DCB.aspx>

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—APS TARC liaisons begin working with 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

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

The expiration dates are 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 are 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 with the initial authorization. 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 design were:

Partners

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

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

Consulted via Phone Conferences

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

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

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

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.