

# **Children's Justice Act Program Instruction**

**OMB Information Collection Request  
0970 - 0425**

## **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 Children’s Bureau (CB) is a division of the Administration on Children, Youth and Families (ACYF), Administration for Children and Families of the Department of Health and Human Services. CB has responsibility for the administration of the Children’s Justice Act (CJA) authorized by the Child Abuse Prevention and Treatment Act (CAPTA), as amended by Public Law (P.L.) P.L. 111-320 enacted December 20, 2010.

The CJA program is located in Section 107, 42 U.S.C. 5106c under Grants to States for Programs Relating to the Investigation and Prosecution of Child Abuse and Neglect Cases. The CJA is designed to assist states in improving the systems handling child abuse and neglect cases. CB staff execute all the tasks involved in administering and monitoring the CJA program.

The legislation notes a requirement for States to submit information to the CB on an annual basis:

42 U.S.C. 5106c Sec. 107 (b) (4) of CAPTA requires States to “submit annually an application to the Secretary....”

42 U.S.C. 5106c Sec. 107 (B) (5) of CAPTA requires States to “submit annually to the Secretary a report on the manner in which assistance received under this program was expended throughout the State,...”

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

CB uses the information collected to annually determine the eligibility of states for CJA grants. CB and the states use the reports as a mechanism for monitoring the expenditure of funds and to evaluate and measure state efforts to reform the child welfare systems’ handling of child abuse and neglect cases.

CB uses the reports for the development of reliable comprehensive information and data from statewide and national perspectives. This information assists in the development of policy and program decisions, establishment of funding priorities, and recommendations provided to the Congress.

A compilation of information and data is available to state and local governments for use in developing their legislative, program and policy decisions, and determining their training and technical assistance needs. Information is available to researchers, practitioners and to the general public.

### **3. Use of Improved Information Technology and Burden Reduction**

To reduce the report burden on respondents, CB encourages states to submit the reports and applications electronically (via email) to the Federal Project Officer. CB also encourages states to submit their periodic financial reporting forms electronically, via the ACF On-Line Data Collection (OLDC) system.

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

Information collected from CJA program applications is unique to CJA programs and is not available from other sources.

Program performance reports provide information regarding the status or results of specific projects or activities supported with the CJA grant funds. This information is not available from other sources.

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

There is no impact on small businesses or other small entities. The information collection involves only state agencies.

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

CAPTA Sec. 107 (b) (4) and (5) require annual applications and performance reports. Grants are awarded annually and therefore grant applications are required annually.

The submission contains the performance report that serves as a mechanism to monitor a state's progress and accomplishments, as well as proposed activities.

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

The proposed information collection will be conducted in a manner consistent with the guidelines in 5 CFR 1320.5. There are no special requirements or special circumstances governing the manner in which information will be collected.

### **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 January 17, 2020 in Volume 85, Number 12, page 3052, and provided a sixty-day period for

public comment. We did not receive comments.

Consultation with representatives from whom information is to be obtained occurs annually at federally-sponsored grantees meetings.

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

States responding with applications and program performance reports receive no payments or other remuneration.

### 10. Assurance of Confidentiality Provided to Respondents

There is no confidential information contained in the application or program performance reports submitted by State grantees.

### 11. Justification for Sensitive Questions

There are no questions of a sensitive nature involved in the preparation or content of the applications or program performance reports.

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

Information Collection Title	Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Children's Justice Act Program Instruction	52	1	60	3,120	\$47.84	\$149,260.80
<b>Estimated Annual Burden Total:</b>				3,120	<b>Estimated Annual Cost Total:</b>	\$149,260.80

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code 21-1021 (Child, Family and School Social Workers) and wage data from May 2018, which is \$23.92 per hour. Therefore to account for fringe benefits and overhead the rate is multiplied by two which is \$47.84. The estimate of annualized cost to respondents for hour burden is \$47.84 times 3,120 or \$149,260.80. <https://www.bls.gov/oes/current/oes211021.htm>

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

There are no direct monetary costs to respondents other than their time to compile applications and program performance reports. No start-up costs are associated with the programs.

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

The estimate of the cost to the Federal government is based on the staff time necessary to receive and review application and reports. Four hours per application and report x 52 applications = 208 hours. Two hundred and eight hours x \$59.00 /hour (estimated salary, expenses, operating costs, etc.) = \$12,272.

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

Contextual information provided in the section entitled “Linkages between CJA and Other Children’s Bureau Programming” has been updated to ensure alignment with current Children’s Bureau priorities. For example, language encouraging CJA grantees to partner with child welfare agencies in implementing their 2020-2024 Child and Family Services Plan (CFSP) and developing their Annual Progress and Services Report (APSR) was included to align with information published in ACYF-CB-PI-20-02, which encouraged child welfare agencies to partner with CJA grantees in these efforts as well. In addition, language reinforcing the importance of judicial “reasonable efforts” to prevent unnecessary removal of children from the home was included to align with ACYF-CB-IM-17-02, and information encouraging grantees to use flexibility in the language they use to describe former victims of abuse and neglect was included in order to align with ACYF-CB-IM-19-03. The order/layout of information in the CJA PI has also been updated in order to create a more logical flow and ease of use. While there have been updates to the contextual information and layout of the PI, there have been no changes to the information collection requirements.

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

While CB does not publish the data states report, it is available upon request by state and local governments for use in developing their legislative, program and policy decisions, and determining their training and technical assistance needs. The information is also available upon request to researchers, practitioners and to the general public.

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

This item is not applicable to this information collection.

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

This item is not applicable to this information collection.

