Data Collection Plan for the Adoption Call to Action

OMB Information Collection Request

0970 - NEW

Supporting Statement Part A - Justification

May 2020

Submitted By:

Children’s Bureau

Administration for Children and Families

U.S. Department of Health and Human Services

**SUPPORTING STATEMENT A – JUSTIFICATION**

# Circumstances Making the Collection of Information Necessary

The Adoption Call to Action is an effort by the Children's Bureau (CB), Administration for Children and Families (ACF) of the U.S. Department of Health and Human Services. The purpose of the Adoption Call to Action is to engage child welfare agencies to improve the timeliness and likelihood of permanency for children who are waiting for adoption. Fifty-three jurisdictions are participating in the Adoption Call to Action. Each jurisdiction will receive technical assistance (TA) support from the Capacity Building Center for States (the Center), a CB-funded provider. Each jurisdiction is involved in developing and implementing innovative solutions to achieve the goals established for this initiative. Lessons learned from this data collection will not only provide an assessment of the overall effectiveness of this initiative, but will inform similar efforts in the future.

# Purpose and Use of the Information Collection

This new information collection will provide CB with an understanding of agency target populations, specific strategies (interventions), and outcomes measurement, in order to inform TA strategies and provide a national picture of the overall success of the initiative. Baseline data will be collected with an initial survey (Baseline Survey) in early summer 2020 (upon OMB approval), with two follow-up survey instruments (Progress Update Survey) designed to collect process and outcome measures three and six months later. The instruments focus on (1) identifying the target population(s) agencies are addressing, (2) understanding elements of intervention implementation (process measures), and (3) capturing information related to the outcomes of these efforts. Respondents of these data collection instruments will include one representative from each of the 53 child welfare agencies who are participating in Adoption Call to Action activities. Respondents will be able to use their own responses to this data collection to support their jurisdiction’s efforts to document and monitor progress and to communicate with stakeholders. Aggregate reporting will be developed from this data collection at each of the three points of data collection to provide TA providers and CB with progress updates that can be used to developed more effective and tailored approaches to assistance.

# Use of Improved Information Technology and Burden Reduction

The primary means of gathering information is through electronic format including the use of online surveys. The Center’s evaluation team also imports online survey data from a password protected server into SPSS, a statistical software package used for storing, managing, and analyzing quantitative data (i.e. survey data). Per guidance outlined in 5 CFR 1320.8, the focused use of electronic data collection methods is intended to reduce the burden on respondents.

# Efforts to Identify Duplication and Use of Similar Information

This proposed evaluation is the only evaluation of the activities and outcomes of the Adoption Call to Action; therefore, there is no similar information already available.

# Impact on Small Businesses and Other Entities

We do not plan to survey small businesses.

1. **Consequences of Collecting the Information Less Frequently**

The current evaluation plan includes data collection methods at key time periods during the initiative and utilizes the minimum amount of data collection necessary to obtain valid, reliable, and useful information that can provide CB with an understanding of agency target populations, specific strategies (interventions), and outcomes measurement, in order to inform TA strategies and provide a national picture of the overall success of the initiative. Reducing data collection further would jeopardize the ability to gather timely data that informs TA activities and to understand in real time jurisdictional progress in achieving targeted goals and objectives of the initiative.

# Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

Responding to this data collection effort is completely voluntary. Individuals recruited for this effort will be given the opportunity not to respond at all, and to respond whenever it is convenient for them during the data collection period.

# 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 the 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 24, 2020, 85 FR 10446, and provided a sixty-day period for public comment. During the notice and comment period, one comment from a child welfare agency was received, which is attached. This agency expressed two primary concerns. The first was related to how to adequately capture and measure its intervention strategies to promote permanency, as the approach taken for securing permanency for each of its local agencies is not the same and each child has his/her own unique needs. This would make it difficult to empirically narrow down specific interventions as the keys to a successful adoption outcome. Instead, this commenter suggested that it may be more appropriate to highlight several different approaches that may be tailored to an individual child’s circumstances as the best practices that states should be implementing. This agency was also concerned about the open-ended questions in the Progress Update Survey, related to capturing outcome metrics, requesting more guidance and conversations about what specific measures should be reported on.

CB believes that the commenter’s concerns will be alleviated, without need for modifications to instrument questions by assuring participating jurisdictions that as part of the Center’s service delivery approach, jurisdictions will also have access to hands-on assistance, as needed, to complete this information collection. This will allow Center TA providers and participating jurisdictions opportunities to discuss and address challenges related to this information collection on a case-by-case basis. CB believes that the Center’s TA providers will be able to work with jurisdictions to determine the best method for reporting the interventions across their local agencies. Modifications were made to the introductory language of the two instruments proposed, to be more explicit about this available support, including how a jurisdiction can contact the Center if such support is needed. In addition, the introductory language now includes a statement about how questions are designed to be exploratory and open-ended to allow jurisdictions with varying needs and interventions to respond in ways that are most appropriate for their project. CB believes that these modifications and assurances will address the concerns of the commenter and meet the needs of other participating jurisdictions that may have similar challenges related to this information collection.

# Explanation of Any Payment or Gift to Respondents

The data collection plan does not call for payment to respondents for participation.

# Assurance of Confidentiality Provided to the Respondents

The Center will keep respondent identity and jurisdiction private in all reporting and only report data in aggregate. The Center will inform respondents of the voluntary nature of their participation in the information collection and that all of their responses will be kept private to the extent permitted by law.

# Justification for Sensitive Questions

Sensitive issues will not be raised on surveys.

# Estimates of Annualized Burden Hours and Costs

Estimates of response burden are outlined in the following table. The baseline and progress surveys will be administered to the fifty-three jurisdictions participating in the Adoption Call to Action. We anticipate the baseline survey to take about 20 minutes to complete and the progress surveys to take about 15 minutes to complete. The progress surveys will be administered at two points in time following the baseline survey.

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Individual and Family Services [21-0000] and wage data from May 2019 (<https://www.bls.gov/oes/current/oes210000.htm>), which is $20.64 per hour. To account for fringe benefits and overhead the rate was multiplied by 2 which is $43.28. The estimate of annualized cost to respondents for hour burden is $43.28 times 15 hours or $649.20.

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| --- | --- | --- | --- | --- | --- | --- | --- |
| **Information Collection Title** | **Total Number of Respondents** | **Total Number of Responses per Respondent** | **Average Burden Hours per Response** | **Total Burden Hours** | **Annual Burden Hours** | **Average Hourly Wage** | **Total Annual Cost** |
| Adoption Call to Action Baseline Survey | 53 | 1 | .33 | 18 | 6 | $43.28 | $259.68 |
| Adoption Call to Action Progress Update Survey | 53 | 2 | .25 | 27 | 9 | $43.28 | $389.52 |
| Estimated Annual Burden Hours | | | | | 15 | Estimated Annual Cost Total | $649.20 |

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

There are no additional costs to respondents.

# Annualized Cost to the Federal Government

The cost to the Federal government was calculated using the Bureau of Labor Statistics (BLS) job code for Social Scientists and Related Workers, All Other [19-3099] wage data from May 2019 (<https://www.bls.gov/oes/current/oes193099.htm>), which is $42.16 per hour. We also estimated 40 total staff hours for instrument development, administration, and analysis of all survey data. This includes one administration of the Adoption Call to Action Baseline Survey and two administrations of the Adoption Call to Action Progress Update. The estimate of annualized costs to the Federal government is $42.16 times 40 which is $1,686.40. The estimated annual Federal costs associated with each survey are outlined in the table below.

|  |  |  |  |
| --- | --- | --- | --- |
| **Instrument & Other Costs** | **Administration Activities** | **Staff Time (Hours)** | **Total Cost** |
| Adoption Call to Action Baseline Survey | Instrument Development, Administration & Analysis | 16 | $674.56 |
| Adoption Call to Action Progress Update | 24 | $1,011.84 |
| Total | | 40 | $1,686.40 |

# Explanation of Program Changes or Adjustments

This is a new information collection request.

# Plans for Tabulation and Publication and Project Time Schedule

The following table provides timeframes for data collection, tabulation, and publication for each instrument.

|  |  |  |  |
| --- | --- | --- | --- |
| **Instrument** | **Date of collection** | **Tabulation (Analysis)** | **Publication** |
| Adoption Call to Action Baseline Survey | Upon OMB approval | Two months after approval | Three months after approval (Interim reporting for CQI\* purposes) |
| Adoption Call to Action Progress Update (1st Administration) | Three months after baseline survey | Two months after administration | Three months after administration (Interim reporting for CQI purposes) |
| Adoption Call to Action Progress Update (2nd Administration) | Six months after baseline | Two months after administration | Three months after administration (Interim reporting for CQI purposes) |
|  |  |  | Sep 2021 (Final report for CB) |

\*CQI = Continuous Quality Improvement

Frequency distributions will be calculated to generate data summaries and to examine variability in online surveys. Cross-tabulations and significance tests will be conducted as appropriate. SPSS will be used for the quantitative analysis. Content analysis will be conducted on open-ended survey items and will entail thematic analysis. Interim reporting will consist of aggregate reports of survey findings provided to CB and TA providers as a progress update that will inform planning efforts for TA activities.  The final report to CB will provide more comprehensive report with findings aggregated across survey administrations. The final report to CB may be adapted for public dissemination, such as conference presentation or journal submission.

# Reasons Display of OMB Expiration Date is Inappropriate

This section does not apply. We are not seeking approval to not display the expiration date for OMB approval.

# Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are requested.