

National Child Abuse and Neglect Data System (NCANDS)

**OMB Information Collection Request
0970 - 0424**

Supporting Statement Part A - Justification

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Children's Bureau
Administration for Children and Families
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SUPPORTING STATEMENT A – JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Child Abuse Prevention and Treatment Act (CAPTA) (42 U.S.C. 5101 et seq.) was amended in 1988 (P.L. 100–294) to direct the Secretary of Health and Human Services (HHS) to establish a national data collection and analysis program, which would make available state child abuse and neglect reporting information. HHS responded by establishing the National Child Abuse and Neglect Data System (NCANDS) as a voluntary national reporting system.

During 1996, CAPTA was amended (42 U.S.C. 5106a(d)) to require all states that receive funds from the Basic State Grant program to work with the Secretary of HHS to provide specific data elements, to the maximum extent practicable, about children who had been maltreated. Most of the required data elements were added to the NCANDS data collection. Subsequent CAPTA reauthorizations and amendments added required data elements.

The Children’s Bureau (CB) proposes to continue to collect NCANDS data using two files of the Detailed Case Data Component (DCDC): (1) Child File, the case-level component of NCANDS and (2) Agency File, the aggregate data component. The current approval of the DCDC expires on February 28, 2021. CB is seeking re-approval of these instruments with no changes to this data collection.

2. Purpose and Use of the Information Collection

A major product of NCANDS is the annual Child Maltreatment report (available at <https://www.acf.hhs.gov/cb/research-data-technology/statistics-research/child-maltreatment>) These national reports have been published annually since 1992 and are the primary source of information about maltreated children who were known to child protective services agencies. The NCANDS data also are a critical source of information for many publications, reports, and activities of the federal government, child welfare personnel, members of Congress, and researchers. Examples of how NCANDS data are used are described below:

- *Child Welfare Outcomes: Report to Congress*—This annual report presents information on state and national performance in seven outcome categories. Data for the original Child Welfare Outcomes measures and the majority of the context data in this report come from NCANDS and the Adoption and Foster Care Analysis and Reporting System (AFCARS). The reports are available on CB’s website at <https://www.acf.hhs.gov/cb/research-data-technology/statistics-research/cwo>.
- Child and Family Services Reviews (CFSRs)— CB conducts periodic reviews of state child welfare systems to ensure conformity with federal requirements, determine what is happening with children and families who are engaged in child welfare services, and assist states with helping children and families achieve positive outcomes. States develop Program Improvement Plans to address areas revealed by the CFSR as in need of improvement. For CFSR Round 3, NCANDS data are the basis for two of the CFSR

national data indicators: Recurrence of Maltreatment and Maltreatment in Foster Care. NCANDS data also are used for data quality checks.

The NCANDS data also are used for several performance measures published annually as part of the ACF Annual Budget Request to Congress, which highlights certain key performance measures in compliance with the Government Performance and Results Modernization Act (P.L. 111–352). Specific measures on which ACF reports using NCANDS data include:

- Decrease the rate of first-time victims per 1,000 children in the population.
- Decrease the percentage of children with substantiated or indicated reports of maltreatment who have a repeated substantiated or indicated report of maltreatment within six months.
- Improve states' average response time between maltreatment report and investigation, based on the median of states' reported average response time in hours from screened-in reports to the initiation of the investigation

According to site administrators, the annual Child Maltreatment reports are some of the most downloaded documents on CB's website. NCANDS data also have been cited in articles in such academic journals as *Pediatrics*, *Child Abuse and Neglect*, *Children and Youth Services Review*, and *Journal of Adolescent Health* and in publications by such organizations and agencies as the Federal Interagency Forum on Child and Family Statistics, Child Trends, and the Centers for Disease Control and Prevention.

3. Use of Improved Information Technology and Burden Reduction

NCANDS supports the use of electronic submission as a method to reduce the burden on the states. States are provided with access to the NCANDS Website for uploading and validating data files online prior to submission. The NCANDS Website uses multifactor authentication (MFA) for security. Once users access their accounts on the NCANDS Website for the first time, they must provide the phone number to which they would like to receive their multifactor authentication code. This is a federal security requirement for NCANDS. Each time a contact signs in, he or she will receive a code via text message that grants him or her access to the NCANDS Website. Users may receive a phone call instead of a text message if they prefer.

The Child File records are transmitted electronically in the American Standard Code for Information Interchange (ASCII) format. Each record contains standardized data pertaining to a child who has received a CPS response pertaining to a specific report alleging maltreatment. States submit these data in one file via an internet site (the NCANDS Website) that was established for secure transmission of state data. A state can only navigate through its own state-specific login; and access to other state information is blocked. The uploaded data files are processed after passing through quality control validation, and states are provided real-time validation results comparing the submission to the previous year.

The Agency File data are submitted via the same secure NCANDS Website. Agency data are aggregated data submitted via tabbed data entry screens designed similarly to a questionnaire.

Helpful instructions are provided for each question or data item. Data can be saved in multiple sessions and submitted when all data are collected. For archival purposes, a state may download the data. The NCANDS Website also provides the feature to compare the submission to the previous year and—again for archival purposes—the comparison template may be downloaded.

The state can resubmit the Child File and Agency File in this same manner, if needed. Furthermore, a state may track the status of its data submission from the time data are first saved until the data are accepted.

4. Efforts to Identify Duplication and Use of Similar Information

The NCANDS data collection effort is recognized as being the primary source of national child protective services statistics and trends on child maltreatment at the state level. There are no other comparable national efforts in the United States. Other studies, with the approval of the Children’s Bureau and the states, have incorporated already submitted NCANDS data in their research to avoid duplication.

As discussed in the previous section, other federal agencies use NCANDS data thereby eliminating potential duplication of data collection efforts.

Section 103 of CAPTA, as amended, requires, “through a national data collection and analysis program and in consultation with appropriate state and local agencies and experts in the field, collect, compile, and make available state child abuse and neglect reporting information which, to the extent practical, shall be universal and case specific and integrated with other case-based foster care and adoption data collected by the Secretary.” The foster care and adoption data reference are collected through the Adoption and Foster Care Analysis and Reporting System (AFCARS), mandated by 42 U.S.C. § 679.

NCANDS and AFCARS are distinct in terms of the populations that they address, but there is some overlap. In support of the goal of integration, the data collection period for NCANDS was changed in 2003 from calendar year to federal fiscal year, the same as AFCARS. The AFCARS ID field also was added to NCANDS as a means of linking the two data sets in the future, as per the CAPTA requirement mentioned above.

One area of overlap between AFCARS and NCANDS relates to a child’s removal from the home. NCANDS requests information about whether a child was removed as an immediate consequence of a report related to abuse or neglect, and the foster care discharge date. This request is in conformity with the 1996 amendments to CAPTA. The removal data collected through NCANDS are likely to be a subset of the more detailed placement data required by AFCARS. The collection of removal data by NCANDS has been consistently supported by the states as an important outcome of case disposition, and states have requested that the data element be retained in NCANDS. States do not consider these data or the additional field pertaining to the AFCARS ID as burdensome or duplicative.

5. Impact on Small Businesses or Other Small Entities

The proposed data collection does not involve small businesses or other small entities. Data will be submitted only by state child welfare agencies. No difference is made according to the population of the state to acquire national data (42 U.S.C. 5106a(d)).

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 child abuse and neglect require the annual collection of data. Several annual reports, including *Child Welfare Outcomes: Report to Congress* mandated by section 203 of the Adoption and Safe Families Act, depend upon NCANDS data. Furthermore, CAPTA requires an annual report of the listed data (42 U.S.C. 5106a(d)).

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 annually.
- *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. An annual date of submission has been established as January 31. States have approximately 120 days from the completion of the federal fiscal year to submit data.
- *Requiring Respondents to Submit More than One Original and Two Copies.* States are expected to submit only one Child File and one Agency File to NCANDS. Data are submitted electronically.
- *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. NCANDS archives each state's submission and can provide the state with a specific prior data submission, if needed. States do not 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 Child File data, each state encrypts its identifiers. No actual case or individual identifiers are submitted. Each state ensures that its data meet a standard of encryption. Before the data are released for public use through the National Data Archive on Child Abuse and Neglect at Cornell University, funded by CB, the Child File identifiers are double-encrypted, adding another layer of confidentiality.
- *Requiring Respondents to Submit Trade Secrets or Other Confidential Information.* NCANDS does not collect any data related to trade secrets. No identifying data, such as name, address, or Social Security number, are collected. The only personally identifiable

information collected are dates of birth, military status indicator, and military family member indicator. NCANDS does not collect information directly from individuals, all information is received from state child welfare agencies. NCANDS underwent the Authorization to Operate (ATO) security review process and received approval for ATO April 18, 2017.

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 March 17, 2020, Volume 85, Number 52, page.15184, and provided a sixty-day notice for public comment.

No comments were received from states.

One comment was received from an epidemiologist who requested adding zip code to the data collection. CB endeavors to protect the identities of child maltreatment victims, their siblings, and other family members who may be innocent by not including a lot of personally identifiable information (PII) in the NCANDS data collection. NCANDS currently uses Federal Information Processing Series (FIPS) county codes, of the child's residence and the county in which the report was investigated or assessed, which have proven sufficient for researchers. Adding zip code to the data collection, may be considered redundant by some and an unnecessary PII collection by others.

The epidemiologist also requested a second prior field to indicate a previous investigation. NCANDS currently collects one prior victim field and a prior perpetrator field (one for each of three possible perpetrators). Collecting an additional prior field is not necessary as improvements in states' abilities to assign a unique identifier within the state to each child and perpetrator enables the child and perpetrator to be tracked in previous submissions by using these IDs.

9. Explanation of Any Payment or Gift to Respondents

No payment to respondents is proposed as part of this data collection.

10. Assurance of Confidentiality Provided to Respondents

Confidentiality and integrity of data are maintained and monitored based on ACF's system security authorization standards, procedures, and protocols. Before the data are released for public use through the National Data Archive on Child Abuse and Neglect, the Child File identifiers are double-encrypted, adding another layer of confidentiality.

11. Justification for Sensitive Questions

While the topic is of a sensitive nature, NCANDS does not collect information directly from individuals, all information is received from state child welfare agencies. To ensure the confidentiality of the Child File data, each state encrypts its identifiers. No actual case or individual identifiers are submitted. Each state ensures that its data meet a standard of encryption. As noted above, before the data are released for public use, the Child File identifiers are double-encrypted, adding another layer of confidentiality.

12. Estimates of Annualized Burden Hours and Costs

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
Detailed Case Data Component: (Child File and Agency File) IT Staff	52	3	40.5	6,318	2,106	\$141	\$296,946
Detailed Case Data Component: (Child File and Agency File) Programmatic Staff	52	3	65.5	10,218	3,406	\$103	\$350,818
Estimated Annual Burden Total:					5, 512	Estimate d Annual Cost Total:	\$647,764

These estimates are based on the experience of states that have provided data to NCANDS. It is premised on the expectation that 52 states will submit the Detailed Case Data Component (Child File and the Agency File). Burden estimates vary due to the size of the state and the availability of resources.

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Computer and Information Systems Managers [11-3021] and General Operations Managers [11-1021] and wage data from May 2019. For the Computer and Information Systems Managers [11-3021], the wage data from May 2019 is \$70.37. To account for fringe benefits and overhead the rate was multiplied by two which is \$140.74 and rounded to \$141 for the purpose of the average hourly wage. For the General Operations Managers [11-1021], the wage data from May 2019 is \$51.47. To account for fringe benefits and overhead the rate was multiplied by two which is \$102.94 and rounded to \$103 for the purpose of the average hourly wage.
<https://www.bls.gov/oes/current/oes211093.htm>

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

There is no other annual cost burden associated with these information collection instruments.

14. Annualized Cost to the Federal Government

	Annual Cost	Total Cost
Children’s Bureau	\$70,213.18	\$210,639.54
Contractor Staff	\$540,8257.22	\$1,622,571.65
TOTAL	\$611,070.40	\$1,833,211.19

The above costs are based upon the use of contractor staff to collect, validate, process, and analyze the Child File and Agency File data, as well as provide briefings and prepare the annual Child Maltreatment report. Contractor staff also provide technical assistance to states throughout the year with the objective of improving data quality. In addition, contractor staff provide support to such other federal data reporting initiatives as the Child and Family Services Reviews, Healthy People 2020 Initiative, and the Child Welfare Outcomes: Report to Congress. Federal staff direct and monitor all efforts.

15. Explanation for Program Changes or Adjustments

The annual burden estimate for 2018–2021 was 7,717 hours, with an annual cost estimate of \$447,453 (included changes). The annual burden estimate for 2021–2025 is 5,512 hours with an annual cost estimate of \$320,836 (no changes requested). The decrease in burden hours and cost is because during the previous OMB ICR there were changes made to data collection that required modification to respondent’s data collection systems and processes. These systems and processes are now in place for respondents, and thus the burden and cost has reduced for the current OMB ICR.

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
- December 1—data request letter sent to all states
- January 31—data submissions due from all states
- March 31—data validation cycle completed, including any data resubmissions
- January 15—annual *Child Maltreatment* report released.

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

The expiration dates will be 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.