

Survey of Youth Transitioning from Foster Care

OMB Information Collection Request
0970–0546

Supporting Statement Part A

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**Alternative Supporting Statement Instructions for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a change request to an approved information collection. .

Description of Request: The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for a one-time survey of youth transitioning from foster care. The goals of the survey are to inform child welfare policies, programs, and practices by identifying the prevalence of human trafficking among youth transitioning from foster care; the risk and protective factors associated with increased or decreased risk of trafficking victimization, respectively; and the context surrounding victimization among youth in foster care. The survey will be administered to youth aged 18 and 19 years who were in foster care during their 17th year (i.e., when they were 17 years old). Survey data will be combined with child welfare administrative data to gain a better understanding of the intersections among youth characteristics, child welfare placements and services, and human trafficking victimization. This study is not intended to promote statistical generalization to areas outside of the chosen sites or to other youth populations. We do not intend for this information to be used as the principal basis for public policy decisions.

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A1. Necessity for Collection

Human trafficking (HT) of youth is a growing public health and social justice concern (Institute of Medicine & National Research Council, 2013; Rothman et al., 2017). Defined as the exploitation of minors for forced labor or commercial sex, HT of minors crosses cultural and economic boundaries and has been linked to a wide range of short- and long-term physical and psychological health problems (Institute of Medicine & National Research Council, 2013).

Two federal laws have defined the child welfare (CW) system's role with respect to trafficking. The 2014 Preventing Sex Trafficking and Strengthening Families Act (Pub. L. 113-183) requires state CW agencies to identify, document, and respond to children in their placement, care, or supervision who are identified as victims of sex trafficking or who are at risk of sex trafficking. The 2015 Justice for Victims of Trafficking Act (Pub. L. 114-22) extended these provisions by requiring state CW agencies to consider any child victim of sex trafficking as a victim of child maltreatment.

Although CW agencies have rapidly expanded their capacity to identify and serve victims of both sex and labor trafficking in recent years, data collection is needed to understand (1) the scope of the problem within the CW system; (2) factors that place youth¹ in the CW population at higher risk for HT or decrease the likelihood of HT; and (3) the context of victimization, like whether youth had run away from foster care when trafficking occurred. This study will help the Administration for Children and Families (ACF) identify and better assist children and youth served by its programs who are victims of, or are at increased risk of, HT.

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose

Purpose and Use

The potential uses of this data will inform CW policy, programs, and practice related to HT. Although the association of HT with child maltreatment (e.g., child neglect or physical, sexual, or emotional abuse) and out-of-home placement (e.g., foster care) is well established,² it is not understood why some youth who have experienced maltreatment and related experiences experience HT and others do not. This survey will provide information not otherwise available on the lifetime prevalence of HT among youth transitioning from foster care; identifiable risk and protective factors associated with increased or decreased risk of trafficking victimization, respectively; and the context surrounding victimization among youth. The survey will thus support development of effective strategies to prevent, identify, and respond to HT while youth are in foster care and as they exit foster care in young adulthood. The information collected is meant to contribute to the body of knowledge on ACF programs. It is not

¹ Survey respondents will be 18 or 19 years old. However, we use the term "youth" to be consistent with the definition of "youth" and "young people" (individuals up to age 24) used by both U.S. government agencies (e.g., youth.gov) and international organizations (World Health Organization, United Nations).

² See, for example, Clayton, E. W., R. D. Krugman and P. Simon (2013); Choi, K. R. (2015); and Gibbs, D. A., A. M. Henninger, S. J. Tueller and M. N. Kluckman (2018).

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intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information.

Research Questions or Tests

The research questions for this study are outlined in **Table 1**.

Table 1. Research Questions (RQs): Survey of Youth Transitioning from Foster Care

Prevalence	
RQ1	How many youth report having experienced sex trafficking before age 18, sex trafficking after age 18, and/or labor trafficking?
RQ2	How do the number and characteristics of youth who self-reported trafficking experiences compare with those whose trafficking was identified by the CW agency?
RQ3	Based on known characteristics of the study population, what is the estimated prevalence of trafficking among older youth in foster care?
Risk and Protective Factors	
RQ4	What factors differentiate youth who report trafficking experiences from other youth? These may exist at the individual level (e.g., sexual orientation/gender identity, risk behaviors), system level (e.g., juvenile justice involvement), community level (e.g., extended foster care), or social support level (e.g., adequacy of support system).
RQ5	What factors appear to precede trafficking victimization?
RQ6	Among factors associated with self-reported trafficking experiences, which are potentially modifiable through resource and policy measures?
Context of Trafficking Victimization	
RQ7	Did trafficking occur while the youth was in a CW or juvenile justice placement?
RQ8	Did another person arrange or profit from the youth's sex trafficking? If so, what was the youth's relationship to that person? Do facilitator roles vary by age at which trafficking occurs?
RQ9	Did any acute events precede the trafficking experience (e.g., running away or being kicked out of home)? Do precipitating events vary by age at which trafficking occurs?
RQ10	What contextual factors (i.e., trafficking during missing-from-care episodes may be more likely to be identified) affect whether trafficking was identified by the CW agency?
RQ11	What services or supports, like extended foster care, social support, or material resources are associated with a reduced susceptibility to trafficking?

Study Design

The Survey of Youth Transitioning from Foster Care will be a *one-time survey* with up to 780 youth aged 18 or 19 who were in foster care during their 17th year (i.e., when they were 17 years old), using in-person or remote data collection. Because HT is a relatively rare occurrence even within the CW population, the survey will oversample youth with characteristics and experiences associated with increased risk of HT victimization, as described below. Youth will be sampled and recruited from two to three participating sites.

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Participating sites will be state or large county CW agencies.³ Sites will be selected based on characteristics that support the survey's ability to address research questions. These include numbers of youth in foster care at age 17, geographic and demographic diversity, and diversity of CW practice and resources in different sites. Feasibility of survey sampling and operations will also be considered. The contractor will identify sites that best meet these criteria, engage initial points of contact in each site, and invite them to participate in the study.

The survey sample will over-represent youth with characteristics associated with increased risk for HT, as identified from CW administrative data in participating sites.⁴ Characteristics associated with HT risk that are available from CW data include the timing and type of child maltreatment allegations, out-of-home placements, and runaway episodes. Study sites will provide an extract of anonymized data (i.e., no personally identifiable information [PII]) that will be analyzed by the contractor. Youth with characteristics associated with HT risk will be disproportionately selected for inclusion in the survey sample. Study sites will then be asked to provide contact information (e.g., name, last known address, and Social Security Number [SSN] if available) for selected youth.

³ Site selection and recruitment procedures are described in detail in SSB, Section B2.

⁴ See SSB, Appendix C for a list of CW data elements used for sampling.

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The sample size in each site is set at 260 youth to achieve at least 200 completed surveys (an expected response rate of approximately 75%).⁵ This number was calculated to be adequate for statistical testing of key relationships (e.g., the relationship between key risk factors and HT) within sites. Based on known characteristics of the study sample, survey responses can be used to produce internally valid estimates of HT prevalence within CW populations in the participating sites. However, this study is not intended to promote statistical generalization to areas outside of these sites or other populations of youth.

The information collection request (ICR) approved in April 2020 described data collection conducted in person, with both field interviewer-administered items (computer-assisted interviewing [CAI]) and, for the most sensitive topics, Audio-Computer Assisted Self-Interview items (ACASI), for which the respondents hear the questions read by the computer through headphones and enter their responses directly into the computer. In light of safety concerns for both interviewers and participants related to the COVID-19 pandemic, the survey instrument and materials have been modified to allow for remote administration by telephone and web.

Survey questions will assess youth demographic information (e.g., sex), protective factors or internal and external assets (e.g., mental health, social support), risk-elevating behaviors (e.g., substance use), CW and other system involvement (e.g., juvenile justice), and trafficking and other victimization histories. See **Instrument 1: Survey of Youth Transitioning from Foster Care – SYTFC** for the complete set of survey items. With the consent of surveyed youth, survey responses will be linked to individual CW administrative data to address fully ACF’s objectives of understanding HT among the CW population. **Table 2** summarizes how survey modules and CW data will be used to address the study’s research questions.

Table 2. Survey of Youth Transitioning from Foster Care Questions, Constructs, Data Sources and Instrument Module/Sections

Construct	Data Source	Instrument Module/Section or Item(s)
RQ1. How many youth report having experienced sex trafficking before age 18, sex trafficking after age 18, and/or labor trafficking?		
Self-reported trafficking experience(s)	Youth transitioning from foster care (YTFC) Survey	HT

⁵ Details of the survey sample are provided in SSB, Section B2.

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Construct	Data Source	Instrument Module/Section or Item(s)
RQ2. How do the number and characteristics of youth who self-reported trafficking experiences compare with those whose trafficking was identified by the CW agency?		
Youth characteristics	YTFC Survey	Demographics
	YTFC Survey	System involvement; Runaway or kick out experiences
	YTFC Survey	Social support; Community services
	YTFC Survey	Internal assets; External assets
	YTFC Survey	Substance use; Mental health
	YTFC Survey	Victimization; Sexual experiences; Relationship violence
System-identified trafficking experience(s)	CW admin data*	Number of CW identified trafficking cases; Characteristics of youth in CW system
RQ3. Based on known characteristics of the study population, what is the estimated prevalence of trafficking among older youth in foster care?		
Self-reported trafficking experience(s) Youth characteristics	YTFC Survey	HT
	YTFC Survey	Demographics
	YTFC Survey	System involvement; Runaway or kick out experiences
	YTFC Survey	Social support; Community services
	YTFC Survey	Internal assets; External assets
	YTFC Survey	Substance use; Mental health
	YTFC Survey	Victimization; Sexual experiences; Relationship violence
System-identified trafficking experience(s)	CW admin data*	Number of CW identified trafficking cases; Characteristics of youth in CW system
RQ4. What factors differentiate youth who report trafficking experiences from other youth?		
Self-reported trafficking experience(s)	YTFC Survey	HT

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Construct	Data Source	Instrument Module/Section or Item(s)
Youth characteristics	YTFC Survey	Demographics
	YTFC Survey	System involvement; Runaway or kick out experiences
	YTFC Survey	Social support; Community services
	YTFC Survey	Internal assets; External assets
	YTFC Survey	Substance use; Mental health
	YTFC Survey	Victimization; Sexual experiences; Relationship violence
RQ5. What factors appear to precede trafficking victimization?		
Timing of self-reported trafficking experience(s)	YTFC Survey	HT
Timing of potential risk factors	YTFC Survey	Disability
	YTFC Survey	Victimization; Sexual experiences
	YTFC Survey	Runaway or kick out experiences
	YTFC Survey	Substance use; Mental health
	YTFC Survey	System involvement
RQ6. Among factors associated with self-reported trafficking experiences, which are potentially modifiable through resource and policy measures?		
Self-reported trafficking experience(s)	YTFC Survey	Human trafficking
Potentially modifiable factors	YTFC Survey	Victimization; Sexual experiences
	YTFC Survey	Runaway or kick out experiences
	YTFC Survey	Substance use; Mental health
	YTFC Survey	System involvement
	YTFC Survey	External assets
	YTFC Survey	Community services
	YTFC Survey	Social Support
RQ7. Did trafficking occur while the youth was in a CW or juvenile justice placement?		
Timing of self-reported trafficking experience(s)	YTFC Survey	HT
Living situation at time of self-reported trafficking	YTFC Survey	HT

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Construct	Data Source	Instrument Module/Section or Item(s)
experience(s)		
Runaway or kicked out at time self-reported trafficking experience(s)	YTFC Survey	HT
RQ8. Did another person arrange or profit from the youth's sex trafficking? If so, what was the youth's relationship to that person? Do facilitator roles vary by age at which trafficking occurs?		
Relationship to facilitator(s)	YTFC Survey	HT
Age at self-reported trafficking experience(s)	YTFC Survey	HT
RQ9. Did any acute events precede the trafficking experience (e.g., running away or being kicked out of home)? Do precipitating events vary by age at which trafficking occurs?		
Timing of runaway/kickout episode(s)	YTFC Survey	Runaway or kick out experiences
Timing of CW or juvenile justice placement(s)	YTFC Survey	System involvement
Living situation at time of self-reported trafficking experience(s)	YTFC Survey	HT
Age at self-reported trafficking experience	YTFC Survey	HT
RQ10. What contextual factors affect whether trafficking was identified by the CW agency?		
Self-reported trafficking experience(s)	YTFC Survey	HT
Youth characteristics	YTFC Survey	Demographics
	YTFC Survey	System involvement; Runaway or kick out experiences
	YTFC Survey	Social support; Community services
	YTFC Survey	Internal assets; External assets
	YTFC Survey	Substance use; Mental health
	YTFC Survey	Victimization; Sexual experiences; Relationship violence
System-identified trafficking experience(s)	CW admin data*	Number of CW identified trafficking cases; Characteristics of youth with CW identified trafficking cases
RQ11. What services or supports, like extended foster care, social support, or material resources might have reduced the youth's susceptibility to trafficking?		
Self-reported trafficking experience(s)	YTFC Survey	HT
Youth characteristics	YTFC Survey	Demographics
	YTFC Survey	System involvement; Runaway or kick out experiences
	YTFC Survey	Social support; Community services
	YTFC Survey	Internal assets; External assets
	YTFC Survey	Substance use; Mental health
	YTFC Survey	Victimization; Sexual experiences; Relationship

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Construct	Data Source	Instrument Module/Section or Item(s)
		violence
Self-report of helpful supports	YTFC Survey	Open-ended questions

Note. Asterisks (*) indicate data only available to study team for analysis if participant consents to data linkage.

Other Data Sources and Information Uses

Federal agencies are encouraged to leverage existing administrative data as a means of increasing the utility of their research in a cost-efficient manner (OMB, 2014). As described above, two distinct uses will be made of CW data. First, CW data will be used in sample selection to over-represent youth at increased risk of HT victimization. In addition, with youth consent, survey responses will be linked to CW administrative data (CW records) to support analysis. Participating CW agencies will provide administrative data in its existing format, with the addition of a crosswalk identifier included in the anonymized data used for sampling. The crosswalk identifier will enable linkage of survey and administrative data for youth who consent to linking. The contractor will create analytic variables needed to support sampling and analysis. **Table 3** presents the information that will be examined from CW records for use in sampling and analysis.

Table 3. CW Data Elements Used for Sampling and Analysis

Data Type	Data Elements	Sampling and Analytic Use
Person ID	<ul style="list-style-type: none"> ▪ Links event-level variables for construction of child-level files ▪ For sampled youth and surveyed youth who consent to data linkage, links among data files 	<ul style="list-style-type: none"> ▪ File management
Date of birth, gender, race, ethnicity	<ul style="list-style-type: none"> ▪ Demographic characteristics 	<ul style="list-style-type: none"> ▪ Sample description and stratification
Maltreatment allegations	<ul style="list-style-type: none"> ▪ Aggregate to maltreatment type (child neglect, physical abuse, psychological abuse, sexual abuse, HT, other) 	<ul style="list-style-type: none"> ▪ Types of maltreatment experienced
Investigations	<ul style="list-style-type: none"> ▪ Investigation number (links events within investigation) ▪ Received date ▪ Closed date ▪ Maltreatment type ▪ Most serious finding for each maltreatment type 	<ul style="list-style-type: none"> ▪ Age at first and most recent investigation, by maltreatment type ▪ Number of investigations, by maltreatment type ▪ Number of substantiated allegations, by maltreatment type

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Removals / placements	<ul style="list-style-type: none"> ▪ Removal begin date ▪ Begin and end dates for each placement within a removal episode ▪ Type of placement(s) ▪ Exit reason for each placement ▪ Reason for end of removal episode 	<ul style="list-style-type: none"> ▪ Age at first and most recent removal episodes ▪ Total time spent in out-of-home care ▪ Number and types of placements ▪ Exit status for placement and removal episodes
Missing child reports	<ul style="list-style-type: none"> ▪ Report date ▪ Risk indicators associated with missing report (e.g., gang involved) ▪ Recover date ▪ Return status (located, aged out, etc.) 	<ul style="list-style-type: none"> ▪ Age at first and most recent missing-from-care episodes ▪ Total time missing from care ▪ Temporal relationship between missing-from-care and trafficking experiences

A3. Use of Information Technology to Reduce Burden

The Survey of Youth Transitioning from Foster Care will be programmed for computer-assisted interviewing (CAI), conducted in-person or via telephone and web. Compared with a paper-and-pencil instrument, CAI offers several features that make the survey more efficient, and thus less burdensome for the respondent, while also supporting data quality. First, CAI technology makes possible the administration of complex questionnaires by interviewers with a level of accuracy that would otherwise not be feasible. CAI-programmed surveys implement complex skip patterns based on youth responses to gateway questions and to fill specific wordings based on answers previously provided by the respondent. Second, CAI technology improves the consistency of data provided by a respondent. If a respondent's answers fall outside the logical range, the interviewer is prompted to verify the two seemingly inconsistent pieces of data with the respondent while their thinking on how the answer was formulated is still fresh. This reduces the need for subsequent data editing. Third, CAI technology provides greater expediency with respect to data processing and analysis. A number of back-end processing steps, including editing, coding, and data entry become part of the data collection process.

This study will use a computerized document management system (DocMan) developed by RTI International for any in-person data collection. With DocMan, interviewers secure respondents' signatures on all documents (e.g., informed consent forms) via the laptop computer, an electronic signature pad, and a portable scanner. Signed forms are transmitted electronically with completed questionnaire data in encrypted files and reviewed for completeness and accuracy. As with CAI, this increased efficiency of the signature process reduces respondent burden.

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A4. Use of Existing Data: Efforts to Reduce Duplication, Minimize Burden, And Increase Utility And Government Efficiency

Several efforts were undertaken to identify existing data, reduce duplication, and minimize burden. A website scan revealed no ongoing federal efforts to conduct research to understand HT victimization among the CW population, and no comparable studies addressing risk for HT victimization among youth who have experienced maltreatment or foster care placement. In addition, a dataset scan identified no federal data collection systems or surveys with the requisite data needed to answer questions related to risk and protection following child maltreatment. Thus, the information being collected through the Survey of Youth Transitioning from Foster Care cannot be obtained through other sources. In addition, the study's use of CW administrative data to support survey data analysis reduces respondent burden, by reducing the number of questions asked of respondents.

A5. Impact on Small Businesses

This survey does not involve data collection from small organizations.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. Consultation

Federal Register Notice and Comments

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 September 10, 2019, Volume 84, Number 175, page 47519 and provided a 60-day period for public comment. A copy of this notice is attached as **Appendix A: 60-Day Federal Register Notice - SYTFC**. During the notice and comment period, 9 requests for the information collection were received and fulfilled; 4 sets of comments were received from 5 organizations, which are attached as **Appendix B: Public Comments - SYTFC**. The public comments as well as a summary of actions taken in response to these comments are included in **Appendix B**.

Consultation with Experts Outside of the Study

The project team consulted with several experts external to the study team to inform the study design and data collection instrument. The selection of a study design was informed by the expertise of Mark Courtney, PhD. Dr. Courtney is a national expert on CW issues and policies and the Principal Investigator on a series of research studies focused on youth currently and formerly in foster care, including the California Youth Transitions to Adulthood (CalYOUTH; 2012-present) Study and the Midwest Evaluation

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of the Adult Functioning of Former Foster Youth (Midwest Study; 2002–present). The data collection instruments were developed in consultation with Dr. Courtney in addition to subject matter experts with a broad range of expertise on topics related to HT, victimization, risk and protective factors (e.g., substance use), and internal and external assets and resources. After careful review by an RTI senior survey methodologist specializing in survey design for sensitive topics who was not otherwise involved in the study (Ms. Rachel Caspar), revisions were made to streamline the instruments, reduce burden, simplify wording, increase variation in response options, and improve coherence of scales for summing. Sensitive sections of the data collection instrument as well as the associated lead letter were reviewed by three trafficking survivor-advocates with significant experience working with child and youth victims of trafficking. Revisions were made improve response validity, reduce participant burden, increase appropriateness for highly victimized population, and include additional trauma informed language.

Experts, affiliations, and consultation domains are outlined in **Table 3**.

Table 3. Expert Consultants

Expert Consultant	Affiliation	Consultation Domain
Rachel Caspar, MA	RTI International	Survey methodology; surveys of sensitive topics; survey methods for maximizing data quality while controlling costs and minimizing respondent burden
Mark Courtney, PhD	University of Chicago	Overall study design; instrument content; external assets; system involvement; community services; social support
Meredith Dank, PhD	John Jay College of Criminal Justice	Overall study design; instrument content; human trafficking and victimization
David Finkelhor, PhD	University of New Hampshire	Instrument content; victimization
Sherry Hamby, PhD	University of the South	Instrument content; victimization; internal assets
Amanda Nguyen, PhD	University of Virginia	Instrument content; internal assets
Nicholas Peiper, PhD	RTI International	Instrument content; alcohol and drug use
Cassandra Simmel, PhD	Rutgers University	Instrument content; victimization; mental health
Eric Wright, PhD	Georgia State University	Instrument content; human trafficking
Nat Paul		Instrument content; human trafficking and victimization; runaway/kick out experiences; lead letter
Kimberly Mull, MVSM		Instrument content; human trafficking and victimization; runaway/kick out experiences; lead letter
Ummra Hang, MSW		Instrument content; human trafficking and victimization; runaway/kick out experiences; lead letter

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A9. Tokens of Appreciation

Tokens of appreciation (\$75 gift card) will be offered to participating youth. Tokens of appreciation are used to offset costs of participation in data collection, such as transportation to a private setting appropriate for in-person or remote data collection, and child care (if needed). They also serve to encourage participation among high-risk respondents, which is particularly important given the sensitive nature of the questions. Minimizing nonresponse is critically important for surveys like the Survey of Youth Transitioning from Foster Care. Youth offered participation in this survey have very recently (or currently) been involved with the CW system. For study findings to be representative, cooperation must be secured from participants with wide-ranging characteristics and outcomes, including those most at risk for HT.

A10. Privacy: Procedures to Protect Privacy of Information While Maximizing Data Sharing

Personally Identifiable Information

A limited amount of PII will be used from CW administrative records for the purpose of locating and recruiting sampled youth. These include name, last known home address and telephone number, and SSN (if available). Youth SSN will be used only for the purpose of finding respondents and offering them participation. For youth who agree to link their survey responses to CW administrative data, the study will use the crosswalk variable included in the anonymized sampling file to request CW administrative data without the use of SSNs or other PII. Information collected by the study team will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. As specified in the contract, RTI will comply with all federal and departmental regulations for private information.

Both the consent form and data linkage form describe measures taken to assure participant privacy. These include assurances that the research team will protect the privacy of respondents to the fullest extent possible under the law, that respondents' participation is voluntary, and that they may withdraw their consent at any time without any negative consequences.

The survey will also use Computer Audio-Recorded Interviewing (CARI). CARI is a laptop computer application developed by RTI for audio recording of field data collection to verify data collection and quality of data collection. The consent form also explains that CARI recordings will not include identifying information for participants and recordings will be destroyed after a review of survey quality. Participants have the opportunity to separately consent or opt out of CARI for their survey. As noted in **Section A3**, the contractor will use DocMan to securely obtain and transmit signed respondent documents, including informed consent forms.

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In addition to project-specific training about study procedures, members of the data collection team will receive training that includes general security and privacy procedures. All members of the data collection team will be knowledgeable about privacy procedures and will be prepared to describe them in detail or answer any related questions raised by respondents.

Because of the sensitive nature of this research, the study will obtain a federal Certificate of Confidentiality. The Certificate of Confidentiality helps to assure participants that their information will be kept private to the fullest extent permitted by law. Prior to initiating contact with sampled youth, study approval will be received from the RTI Institutional Review Board (IRB).

Data Security and Monitoring

The project team will use its extensive corporate administrative and security systems to prevent the unauthorized release of information, including state-of-the-art hardware and software for encryption that meet federal standards and physical security that includes a keyless card-controlled access system on all buildings and local desktop security and account lockout via Microsoft Windows.

The contractor has established data security plans for handling data during all phases of the data collection, as follows:

- Field staff laptops will be password protected and disk encrypted. There are several levels of password-protected access required to view the files on the laptops. Failure to provide a password at any of the levels denies access to the case files.
- Data will be transmitted and stored in a way that only members of the project team who are authorized and have need will have access to any identifying information. All project team members have been trained on data security procedures and have signed agreements that provide for termination of employment, civil suit, and financial and other penalties in case of violation. RTI field laptops and the data transmitted to and from the laptops are encrypted with Federal Information Processing Standard (FIPS) 140.2-compliant algorithms.
- All personnel working on the survey must sign affidavits pledging that the data they will collect or work with will not be disclosed. Penalties for disclosure include termination of employment and substantial financial fines.
- Access to project file shares, systems, and data is strictly controlled by role-based security in the form of Windows security groups. An individual's security group membership is determined based on the minimum necessary access to perform their job function on the project. Staff are only added to security groups after completing the Project Confidentiality Pledge and any required trainings on data security. Security group membership is audited quarterly by project leaders to ensure that only those who still need specified access continue group membership.

A11. Sensitive Information

Because the Survey of Youth Transitioning from Foster Care focuses on risk and protection associated with HT, it deals with several private and sensitive topics⁶. This information is necessary to address the

⁶ Examples of sensitive topics include (but are not limited to) SSN; sex behavior and attitudes; illegal, antisocial, self-incriminating, and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities that indicate

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study's core research questions and are not reliably available from other sources. The survey includes potentially sensitive questions about, for example, delinquency, mental health, receipt of economic assistance by the government, alcohol and drug use, and exposure to violence. All study materials and procedures have been approved by the contractor's IRB (Federalwide Assurance #3331, effective until November 2023).

Respondents are advised of the voluntary nature of participation and their right to refuse to answer any question during the informed consent process. Additionally, at the beginning of the ACASI (in-person administration) or web (remote administration) portion of the survey containing the most sensitive questions, respondents are reminded of the importance of their honest answers and assured that any information they provide will be kept private to the fullest extent permitted by law. Respondents are also reminded of the exceptions to privacy (i.e., information indicating suicidal or homicidal intent or that a child's life or health may be in danger).

As noted in **Section A10**, SSNs for sampled youth (if available) will be included in the administrative data received from participating CW sites for youth selected for the survey sample. SSNs will only be used to assist with locating potential youth participants. We anticipate contact information for youth not in foster care after age 18 to frequently be out-of-date. These individuals represent youth who exited to family or relatives prior to age 18 and those who aged out at 18. Because the participating CW sites may not have had contact with these youth after exit, it is likely that available address and telephone number information is outdated and inaccurate. SSNs will only be used to assist with locating individuals through administrative database searches available to the contractor (e.g., LexisNexis, Experian, and TransUnion).

A12. Burden

Explanation of Burden Estimates

We estimate that up to 780 respondents could complete the one-time Survey of Youth Transitioning from Foster Care.⁷ On average, the survey is estimated to take .92 hours (55 minutes) to complete. Using a standard estimated time for question completion, the burden was calculated by averaging the time to complete the minimum and maximum number of survey items a respondent could be asked based on varying skip patterns. To compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage for each youth participant, according to first-quarter 2019 data

political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians, and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

⁷ Although likely response rate was used when calculating statistical power, the largest possible survey population size was used for burden estimate in order to be transparent regarding potential respondent burden.

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available from the Bureau of Labor Statistics (BLS).⁸ The mean salary for full-time employees over the age of 25 who are high school graduates with no college experience was used (\$18.475 per hour) The BLS does not provide data on mean salaries for younger employees or those without high school degrees.

Estimated Annualized Cost to Respondents

Table 4 provides annual and total costs to respondents.

Table 4. Annual and Total Data Collection Burden

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Survey of Youth Transitioning from Foster Care	780	1	0.92	718	359	\$18.475	\$6,632.53

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities under this current request will be \$1,634,758. Annual costs to the Federal government will be \$817,379 for the proposed data collection.

Cost Category	Estimated Costs
Instrument development and OMB clearance	\$185,109
Field work	\$1,135,926
Analysis	\$169,672
Publications/dissemination	\$144,051
Total costs over the request period	\$1,634,758
Annual costs	\$817,379

A15. Reasons for Changes in Burden

⁸ <https://www.bls.gov/news.release/wkyeng.t05.htm>

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Burden estimates have been modified from those provided in the original ICR as a result of the deletion of lower-priority items to facilitate remote data collection.

A16. Timeline

Table 5 outlines the key time points for the study and for information collection, analysis, and reporting.

Table 5. Plan and Time Schedule for Information Collection, Tabulation, and Publication

Project Activity	Time period
Data collection	8 months, following OMB approval
Data analysis	6 months, following data collection
Disseminate findings, including reports, practice briefs, slide decks, and manuscript(s)	6 months, following completion of data analysis

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments: Added November 2020

Appendix D-2: Remote Lead Letter – SYTFC

Appendix E-2: Remote Consent Form – SYTFC

Appendix F-2: Remote Data Linkage Form – SYTFC

Previously Approved Attachments: Modified November 2020

Instrument 1: Survey of Youth Transitioning from Foster Care – SYTFC

Appendix D: Lead Letter – SYTFC

Appendix E: Consent Form – SYTFC

Appendix F: Data Linkage Form – SYTFC

Previously Approved Attachments Appendix A: 60-Day Federal Register Notice – SYTFC

Appendix B: Public Comments – SYTFC

Appendix C: Child Welfare Data Elements Used for Sampling and Analysis – SYTFC

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References

Choi, K. R. (2015). "Risk factors for domestic minor sex trafficking in the United States: A literature review." Journal of Forensic Nursing **11**(2): 66-76.

Clayton, E. W., R. D. Krugman and P. Simon (2013). Risk Factors for and Consequences of Commercial Sexual Exploitation and Sex Trafficking of Minors. Confronting Commercial Sexual Exploitation and Sex Trafficking of Minors in the United States. E. W. Clayton, R. D. Krugman and P. Simon. Washington, DC, National Academies Press: 77-141.

Courtney, M. E., N. J. Okpych, P. Charles, D. Mikell, B. Stevenson, K. Park, B. Kindle, J. Harty, H. Feng and M. Courtney (2018). "Findings from the California youth transitions to adulthood study (CalYOUTH): Conditions of youth at age 21." Chicago, IL: Chapin Hall at the University of Chicago: 19-3125.

Gibbs, D. A., A. M. Henninger, S. J. Tueller and M. N. Kluckman (2018). "Human trafficking and the child welfare population in Florida." Children and Youth Services Review **88**: 1-10.

Singer, E. (2002). The use of incentives to reduce nonresponse in household surveys. In Groves, R.B., Dillman, D.A., Eltinge, J.L, & Little, R.J.A (Eds), *Survey Nonresponse*. New York: Wiley.

Singer, E., & Ye, C. (2013). The use and effects of incentives in surveys. *The Annals of the American Academy of Political and Social Science*, *645*, 112-141.