

**Runaway and Homeless Youth
Homeless Management Information System (RHY-
HMIS)**

**OMB Information Request
0970-New**

Supporting Statement Part A - Justification

February 2021

Submitted By:
Family and Youth Services Bureau
Administration on Children, Youth and Families
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT - JUSTIFICATION

1. Circumstances Making the Collection of Information Necessary

The Runaway and Homeless Youth (RHY) program serves as the national leader for the provision of shelter and supportive services to unaccompanied homeless youth. The RHY program administers grants to public and private organizations to establish and operate youth emergency shelters and transitional living programs. These grantees are located in all 50 states, the District of Columbia, and the U.S. territories. The three (3) programs are as follows:

1. The **Basic Center Program (BCP)** funds grants to community-based, public and private agencies for the provision of outreach, crisis intervention, temporary emergency shelter, counseling, family reunification, and aftercare services to runaway and homeless youth under age 18 years and their families. BCPs can provide up to 21 days of shelter for up to 20 youth at each facility, with an exception in those jurisdictions that require a higher limit in order to be licensed. Funds available for the BCPs are allotted among the states using a formula based on the population of youth under age 18 years as a proportion of the national population.
2. The **Transitional Living Program (TLP)** and **Maternity Group Homes (MGH)** provide grants to public and private organizations to support long-term, residential shelter, and comprehensive supportive services to homeless youth ages 16 to under 22 years who cannot safely live with their own families. The program provides a long-term, safe, stable, and nurturing environment for eighteen (18) months, and under extenuating circumstances, can be extended to twenty-one (21) months. Services include individual and group counseling, education in basic life skills, interpersonal skill building, assistance with educational advancement, and job attainment skills, and access to physical and mental health care. These services are designed to help youth that are homeless develop the skills necessary to make a successful transition to self-sufficient living. The TLPs also fund maternity group homes, which are specifically designed to meet the needs of pregnant and/or parenting youth. These homes provide the services described above in addition to parenting support.
 - o The **MGH** program supports homeless pregnant and/or parenting young people, as well as their dependent children. MGHs are TLPs specifically designed to meet the needs of pregnant and/or parenting youth. These homes provide the services described above for TLP in addition to parenting skills, childcare, child development, education, and health and nutrition services. Youth must be between the ages of 16 and 22 years to enter the program. In addition to standard TLP services, MGH programs offer an array of comprehensive services including parenting skills, child development, family budgeting, health, and nutrition skills.
3. The **Street Outreach Program (SOP)** provides funding for grants to public and private organizations for street-based outreach and education, and referrals for shelter and services for runaway, homeless and street youth who have been subjected to or are at risk of being subjected to sexual abuse, exploitation, and human trafficking. SOPs provide support services that aim to move youth into shelter or stable housing and help prepare them for independence. Youth receive provisions for their basic needs, including food, clothing, hygiene or first aid packages, information about services and safe places, and encouragement to access these resources.

The Runaway and Homeless Youth Act (RHYA), as reauthorized by the Reconnecting Homeless Youth Act of 2008 (P.L.110-378) through FY 2013 and more recently reauthorized by the Juvenile Justice Reform Act through FY 2019, mandates that Runaway and Homeless Youth programs provide statistical records profiling the youth and family members whom it serves and also mandates that the Department of Health and Human Services (HHS) report regularly to Congress on the status of RHY-funded programs serving runaway and homeless youth. Further, these requirements include maintenance of client statistical records and submission of annual program reports regarding the characteristics of the youth and families served and the services provided to them. The October 2008 reauthorization of the Act and the reauthorization through FY 2019, maintained the longstanding requirements as described in the legislation.

This information collection request is for the Administration for Children and Families (ACF) to continue to collect the data standards to meet these legislative requirements. All RHY funded organizations are required to collect and submit their statistical information/data through a larger system of data standards housed by the Department of Housing and Urban Development (HUD), the Homeless Management Information System (HMIS). ACF's data standards within that system are referred to as the Runaway and Homeless Youth Homeless Management Information System (RHY-HMIS). RHY grantees are required enter their RHY-HMIS data through their local HUD's Continuums of Care (CoC) HMIS. Twice yearly to meet the legislative requirements, RHY grantees work with their HMIS Leads to extract their data for uploading to Family and Youth Services Bureau (FYSB). See sections A3 and A4 for more information about the partnership with HUD and the HMIS.

RHY data standards were historically collected by ACF through the National Extranet Optimized Runaway and Homeless Youth Management Information System (NEORHYMIS) (OMB #0970-0123) until the data elements were subsumed within HUD's HMIS. ACF, in keeping with historic receipt for OMB clearance for NEORHYMIS, made the decision to seek a separate, new OMB number specific for the new RHY-HMIS data standards which can facilitate ACF making all changes to the data standards in the future.

2. Purpose and Use of the Information Collection

The purpose of this RHY data collection is to meet the legislative requirement as specified in the RHYA under Part A and B "to keep adequate statistical records profiling homeless youth which it serves and not to disclose the identity of individual homeless youth in reports or other documents based on such statistical records." The RHY data collected are used for the following purposes:

- Provide data to Congress via the bi-annual Report to Congress;
- Inform the design of future program changes;
- Inform the RHY performance measures;
- Provide respective data to each RHY grantee; and
- Provide data to the Federal Project Officers to assist grantees with technical assistance, as needed.

The data collected includes demographics of youth, services received, any systems involvement, school status, employment status, safe and appropriate exit, and human trafficking involvement, to name a few (see Attachment A-RHY Program Specific Elements).

All RHY grantees must submit RHY data collected in RHY-HMIS to the Family and Youth Services Bureau (FYSB) during a semi-annual upload process by generating a report in the local HMIS with de-identified name, date of birth, and Social Security numbers of all youth served with FYSB funding. The RHY youth-level data are submitted by each grantee through a repository to ACF/FYSB. If the data are not hashed to de-identify personally identifiable information, the RHY grantee receives an error notification and RHY grantees must assign at least one point of contact for uploading the youth-level data to FYSB.

Consent from youth to collect data and enter in RHY-HMIS is not needed, but consent is required for RHY data to be shared across providers that are part of HUD's CoC. The parent or legal guardian of youth under 18 must provide the consent to share data, whereas youth 18 years or older are able to provide consent by themselves to share their data.

3. Use of Improved Information Technology and Burden Reduction

ACF made the decision to integrate the RHY data standards data collection efforts with the HUD's HMIS, creating the RHY-HMIS. Effective April 2015, all RHY grantees were required to enter their RHY data into RHY-HMIS through their local HUD's CoC HMIS. In addition to the technical assistance provided by the RHY-HMIS contractor, additional training will be provided by HMIS administrators, RHYTTAC, RHY program officers and grantees will also have access to online tutorials that provide instructional support for RHY-HMIS data collection through HMIS. RHY grantees must receive access to their local HMIS by a HMIS Lead at the CoC where the RHY grantee provides services and receive training on the use and reporting functionalities of HMIS. RHY grantees must report to the HMIS lead any technical or structural issues on the use of HMIS.

The RHY Act has a legislative requirement to collect data from all RHY funded grantees. RHY data are extracted from the local HMIS system and hashed to de-identify PII and then uploaded to a repository for submission to ACF/FYSB.

4. Efforts to Identify Duplication and Use of Similar Information

In April 2015, ACF joined with HUD and other federal partners that serve homeless populations to move toward a shared language, shared data elements, and improved data collection instruments. This partnership culminated in the integration of the RHY-HMIS data reporting system, which captures all RHY data through HUD's HMIS.

There are no other sources of information available to be reported to ACF on runaway and homeless youth and therefore, the RHY-HMIS data collection effort does not duplicate any existing data collected on this population of youth. In fact, RHY-HMIS is the only uniform collection process that can be reported to ACF regarding the number, composition, and characteristics of runaway and homeless youth served by the RHY programs, as mandated by Congress in the RHY Act.

To ensure minimal duplication of data collected, the HUD data standards, called Universal Data Elements (UDEs), are required to be collected by all federal partners that are part of HUD's HMIS. The UDEs are only required to be entered once for each youth no matter how many times they received service as a method to minimize the duplication of number of youth entered in the HMIS.

5. Impact on Small Businesses or Other Small Entities

Public (state and local) and private nonprofit entities (including faith-based and community organizations) and coordinated networks of such entities, are eligible to apply for RHY funds unless they are part of the juvenile justice system. These include both small and large businesses or entities. As part of their RHY grant requirements, grantees are required to collect and submit data on all youth served by their projects. The information collected is limited to that necessary to fulfill the reporting requirements and grantees submit information electronically.

For profit organizations are not eligible and private institutions of higher education must be non-profit entities.

6. Consequences of Collecting the Information Less Frequently

If the data are not collected and reported, ACF cannot meet the legislative requirement of the RHY Act or the requirement to report these data to Congress. The RHYA requirements include maintenance of client statistical records and submission of annual program reports regarding the characteristics of the youth and families served and the services provided to them. Further, ACF cannot fulfill its obligation to effectively serve the runaway and homeless youth population in the United States, nor report meaningful and reliable information to Congress about the extent of this issue or the effectiveness of various methodologies designed to provide assistance to this population, without access to timely and accurate information.

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

There are no special circumstances regarding the collection of these RHY data. No individually-identifying information is submitted and all reports provide the data in aggregate. Youth are tracked using anonymized, system-generated IDs.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside 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 May 4, 2020, Volume 85, Number 6, page 26482 and provided a sixty-day period for public comment. During the notice and comment period, comments were received from one individual, the American Atheists and Unchained At Last, and the New York State Office of Children and Family Services (OCFS). A summary of the comments and ACF's responses are included below. For the full comments, see the associated public comment documents.

1. **Comment:** i amnot in favor of any of this spending and believe it is a total waste off american tax dolalrs. this comment is for the public record.
 - **ACF Response:** No changes made in response to this comment.
2. **Summary of Comment:** American Atheists and Unchained At Last write in response to the Administration for Children and Families (ACF) request for public comments regarding the “Proposed Information Collection Activity; Runaway and Homeless Youth Homeless Management Information System (RHY-HMIS; New Collection).”¹ Our organizations strongly support efforts to collect more accurate and detailed data pertaining to homeless youth. However, we request that ACF improve the quality and utility of these data standards by integrating child and forced marriage data collection.
 - **ACF Response:** No changes were made in response as many youth who enter a homeless shelter come individually and not with a spouse so collecting information on forced marriage would not add to the youth plan developed. Further, because the RHY data standards are integrated with HUD’s data standards, ACF/FYSB can only make changes to the data collected every 2-3 years when HUD makes changes to their data standards. Changes to HUD’s data standards requires over 43 different vendors to program any revisions across over 400 CoCs’ HMIS; thus, changes cannot be readily made to the data standards.
3. **Summary of Comment:** The New York State Office of Children and Family Services (OCFS) is pleased to submit the following comments in response to the above-referenced proposed information collection activity that was published in the Federal Register, 85 FR 26482, on Monday, May 4, 2020.

OCFS urges the Family and Youth Services Bureau (FYSB) to continue this important work and supports efforts to improve the existing system. In reviewing the current HMIS data standards manual, NYS OCFS has observed that elimination of certain data points would be very beneficial to users and an overall improvement to the functionality of the system. For example, a youth’s social security number is a data point included on HMIS. This information is not necessary to understanding the population trends, client needs, or service outcomes and OCFS suggests it be eliminated. OCFS further submits that the questions seeking general health information about youth and families (questions R7-R9, R13) are not sufficiently detailed to support case management or service provision and therefore have questionable utility. We also believe that the sub-questions in the trafficking section (questions R15 and R16) are overly intrusive. OCFS recommends a feature that would be extremely beneficial to the HMIS system would be a read-only access function for state oversight agencies. The opportunity for state oversight agencies to access raw data and reports from providers in their jurisdiction would open the door for programs to collect, enter, and report data one time, in a unified manner. OCFS heard from providers operating RHY programs in NYS, that the licensing fees associated with using HMIS pose fiscal challenges and recommends ACYF to consider absorbing the HMIS licensing costs.

- **ACF Response:** No changes were made. The rationale for the collection of SSNs as part of HUD’s data standards is to support the unique identification or each person served and facilitate the process of identifying clients who have been served and allow projects to de-duplicate. For RHY, youth either don’t know their SSN or can only provide a partial SSN. In these instances, data are entered using the response option “client doesn’t know” or only the partial SSN. Since the RHY data standards are integrated with HUD’s data standards, in

HUD's system, ACF/FYSB can only make changes to the data collected every 2-3 years when HUD makes changes to their data standards. Changes to HUD's data standards requires over 43 different vendors to program any revisions across over 400 CoCs' HMIS; thus, changes cannot be readily made to the data standards. We will consider these changes for the next time we have the opportunity to revise data standards. Also, the suggestion to provide access to raw data to state oversight agencies would not align with the RHY Act (Section 322) which states as part of eligibility requirements, grantees should "not disclose records maintained on individual homeless youth without the informed consent of the individual youth to anyone other than an agency compiling statistical records." Further, Section 384 of the RHY Act states, "records containing the identity of individual youth pursuant to this Act may under no circumstances be disclosed or transferred to any individual or to any public or private agency." Finally, to address the OCFS comment related to ACYF absorbing the HMIS license costs, all RHY Funding Opportunity Announcements include the following, " Applicants lacking computer equipment (hardware) and client software, as used by their local CoC for the purposes of completing the RHY-HMIS reporting, must include an estimated cost for such equipment, software, and training in their proposed budget. If the applicant already has such equipment, this fact must be noted. In addition, if applicable, clearly describe the burden created due to the organization's inability to pay for the use of the CoC-designated RHY-HMIS and submit an alternative proposal for the use of another HMIS solution." ACF/FYSB also provided a one-time stipend available in amounts up to, but not to exceed, \$1,000 per grantee organization for licensing costs for HMIS in 2016 that were processed through the Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC).

9. Explanation of Any Payment or Gifts to Respondents

There is no remuneration, of any kind, to RHY-HMIS users. Participation in data collection is mandated for all RHY grantees.

10. Assurance of Confidentiality Provided to Respondents

RHY-HMIS currently maintains ACF's required built-in, structured security mechanisms that assure the confidentiality of the clients. These mechanisms include:

- Unique Identifiers - The HMIS data collection system assigns unique agency identification numbers to BCP, TLP, and SOP grantees. The youth identification number is generated by the automated system according to a secure, programmed algorithm. Once a youth is added into the database, only his/her identification number appears on data entry screens and storage files. Individual client files are accessible only to authorized grantee staff and are never transferred to the ACF/FYSB program, HUD, its federal partners or its contractors.
- Hashed names and social security fields – If a grantee does choose to enter names and social security data into its local HMIS, those fields are masked using an industry standard hashing algorithm (SHA-2) to de-identify all homeless clients that are uploaded into the RHY database.
- Informed Consent - Youth and families are informed about the data collection processes and are asked to sign an informed consent form documenting their awareness and understanding of the data collection process and the use of the data in the aggregate for ACF/FYSB before any data elements are entered into the system. Refusal to participate in the data collection process does not preclude a youth or family from receiving services.

- System Security/User Identification - Access to each data file within RHY-HMIS is limited by the use of an authorized user identification number, password, and other security procedures. The grantee's management controls all access to data. The terms and conditions of their grant requires security and confidentiality protection. As a condition of funding, each grantee is required to provide a detailed summary of all agency privacy protocols that govern the security of data, files and youth identity.

11. Justification for Sensitive Questions

There is one HUD data element that is required of all federal agencies (e.g., ACF, SAMHSA, VA) that have integrated with HUD's HMIS that is sensitive in nature, which is a client's Social Security Number (SSN). The rationale for the collection of SSNs is to support the unique identification of each person served and facilitate the process of identifying clients who have been served and allow projects to de-duplicate. For RHY, youth either don't know their SSN or can only provide a partial SSN. In these instances, data are entered using the response option "client doesn't know" or only the partial SSN. The federal statute at 5 U.S.C. Section 522a prohibits a government agency from denying shelter or services to clients who refused to provide their SSN or do not know their SSN.

There are some RHY-HMIS data elements that are designed to collect information that may be considered sensitive. This information pertains to the youth and their family's socio-economic status, mental health, physical health, sexual orientation, and information about commercial sex exploitation, overall health and disability status. It must be noted that, prior to participating in a project, all youth and families are informed that information about them and the services they receive, will be collected, recorded, and submitted anonymously to ACF/FYSB for statistical analysis. As stated above, youth and families are assured that all information is strictly confidential and that their identities are protected. Additionally, program participants are required to sign a statement of agreement that acknowledges that this information as well as their rights have been explained to them.

The RHY program routinely captures data regarding youth sexual orientation and gender which includes transgender as part of the response options. Research suggests that LGBTQ youth make up an overwhelming share of all youth who are experiencing homeless or living on the street. Many of these youth are rejected by their families or experience other trauma that may result in increased risk-taking behaviors. It is important that we capture these data in order to get a more accurate count of this population and learn what services are needed.

In support of agency wide anti-trafficking initiatives, RHY-HMIS captures data on both sex and labor trafficking. With this data measure, we can learn exactly how pervasive sex and labor trafficking is in the RHY community. Homeless youth are especially vulnerable to domestic trafficking because they are likely to engage in survival sex in order to have a place to sleep or for other basic needs.

This collection of this information is extremely critical for ACF/FYSB to ensure the effective delivery of services, use of appropriate interventions and the development of individualized youth and family service plans. It is also essential to assess the attainment of long-term programmatic goals and outcomes and for the early identification of trends and challenges in the field of RHY.

12. Estimates of Annualized Burden Hours and Costs

Annual Burden Estimates

The annual number listed represents youth who receive shelter and supportive services from all awarded RHY programs. The total youth served by RHY grantees is estimated by RHY funding typology (i.e., BCP, TLP, SOP) and at program entry/intake and again at program exit. As an example, the estimate for the number of youth served in a BCP is 123,000 at program entry and 123,000 after the 21 days of emergency shelter when youth exit the BCP. The calculation of the burden hours is based on the time required to complete the previous RHY data standards as part of NEORHYMIS as many of the RHY data standards did not change during the integration with HUD's HMIS.

Burden estimates are also calculated for 611 RHY grantees for staff who enter youth data into the local HMIS regularly and also upload the RHY data to the data repository. Currently grantees upload data twice a year, but that will change move to quarterly in FY 2022 to enhance data quality.

Annual Cost Estimates

The cost to youth respondents was entered as \$0 as these are runaway, street, or homeless youth of which many include minor youth who are being connected to school and older youth who are learning life skills after being on the street and learning job skills.

The cost to RHY grantees were calculated using the Bureau of Labor Statistics (BLS) job code for Social Workers [Job Code #21-1029]¹ and wage data from May 2019, which is \$29.28 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$58.56.

Instrument	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
RHY-HMIS: Basic Center Program (Intake)	123,000	1	0.38	46,740	15,580	\$0	\$0
RHY-HMIS: Basic Center Program (Exit)	123,000	1	0.33	40,590	13,530	\$0	\$0
RHY-HMIS: Transitional Living Program (including Maternity Group Home program and TLP Demonstration Programs; Intake)	18,000	1	0.38	6,840	2,280	\$0	\$0
RHY-HMIS: Transitional Living Program (including	18,000	1	0.33	5,940	1,980	\$0	\$0

¹ https://www.bls.gov/oes/current/oes_stru.htm

Maternity Group Home program and TLP Demonstration Programs; Exit)							
RHY-HMIS: Street Outreach Program (Contact)	108,000	1	0.5	54,000	18,000	\$0	\$0
RHY-HMIS: Street Outreach Program (Engagement)	30,000	1	0.28	8,400	2,800	\$0	\$0
RHY Funded Grantees (data entry)	279,000	2	0.36	200,880	66,960	\$29.28	\$1,960,589
RHY Funded Grantees (data submission) – FY21	611	2	0.16	196	65	\$29.28	\$1,903.20
RHY Funded Grantees (data submission) – FY22 & FY23	611	8	0.16	782	261	\$29.28	\$7,642.08
Estimated Total Annual Burden Hours and Costs:					121,456		\$1,970,134.28

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

There are no costs to RHY grantees or to youth experiencing homelessness for capital or start up. RHY grantees do have to pay a license cost to the HMIS lead in their local CoC for use of their HMIS to enter data and then extract data for the semi-annual data submission to ACF/FYSB. Many grantees receive multiple awards and therefore, do not necessarily purchase system licensing for each separate grant awarded. System licensing includes training, ongoing technical support, software and receipt of any system specific instructional documentation. Costs for the use of the local HMIS to the CoCs vary across the country. It is also important to note that it is estimated that system licensing costs will potentially impact about half of our RHY grantees, only those who are not also funded by HUD. Agencies are allowed to include costs for computers and internet for data entry purposes and system licensing as part of their competitive proposals.

14. Annualized Cost to Federal Government

The total estimated cost to the federal government over the next three years is \$2,454,525. The annualized cost for RHY-HMIS per year is \$818,175. These costs cover all aspects of the contract to support providing training and technical assistance, upgrades and maintenance of the data submission repository, data cleaning and analysis, and the dashboard to provide data to RHY grantees and the Federal Project Officers.

15. Explanation for Program Changes or Adjustments

RHY data standards were historically collected by ACF through the National Extranet Optimized Runaway and Homeless Youth Management Information System (NEORHYMIS) (OMB #0970-0123)

until the data elements were subsumed within HUD’s HMIS. ACF, in keeping with historic receipt for OMB clearance for NEORHYMIS, made the decision to seek a separate, new OMB number specific for the new RHY-HMIS data standards which can facilitate ACF making all changes to the data standards in the future.

16. Plans for Tabulation and Publication and Project Time Schedule:

The RHY-HMIS data collected in HUD’s HMIS will be analyzed to determine the characteristics of runaway and homeless youth, their presenting issues, and services provided to them. ACF/FYSB also will conduct statistical analyses on information about runaway and homeless youth and project activities in order to develop improvement strategies suggested by statistical trends and patterns.

The data collected through RHY-HMIS will be published by FYSB, as required by Federal law (RHY Act), in a report to Congress on the BCP, TLP/MGH, and SOP programs. The data also support FYSB's annual performance measures as part of the response to the Congressional Justification. Brochures, fact sheets, and other publications periodically produced by FYSB also will include information gathered through RHY-HMIS. These publications will serve as resources for RHY grantees and the general public about the breadth and scope of the runaway and homeless youth projects and will support the identification of trends and issues among runaway and homeless youth served in RHY programs.

Project Time Schedule (Occurs each FY):

Contractor identifies Continuum of Care lead and distributes RHY-HMIS instruction and definition manual	October FY2021
Live or self-directed online tutorial is made available to new/current grantees	Spring and fall 2021
Contractor Receives, Cleans and Validates Semi Annual Data Transfer (Covering October 1 – March 30)	December 2021, December 2022
Contractor Receives, Cleans and Validates Data Semi Annual Data Transfer (Covering April 1 – September 30)	June 2022, June 2023
FYSB provides RHY-HMIS data in the report to Congress	Bi-annual

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

Not applicable: The OMB expiration date will be displayed at the bottom of the first page of the instrument.

18. Exceptions to Certification for Paperwork Reduction Act Submissions:

There are no exceptions for this data collection effort.