

## SUPPORTING STATEMENT

OMB Control Number: 0985-New

*Inventory of State Adult Protective Services Practices and Service Innovations:*

*APS Practice Survey*

### PART A: JUSTIFICATION

#### A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

[The Elder Justice Act of 2009](#), which amends Title XX of the Social Security Act (42.U.S.C. 13976 et seq.), requires that the Secretary of the U.S. Department of Health and Human Services “collect and disseminate data annually relating to the abuse, exploitation, and neglect of elders in coordination with the Department of Justice” (Sec. 2041 (a) (1) (B)) and “conduct research related to the provision of adult protective services” (Sec. 2041 (a) (1) (D)). The Elder Justice Act specifically authorizes the U.S. Department of Health and Human Services to develop and disseminate information on best practices in adult protective services, provide training for adult protective services, and provide technical assistance to states and others that provide or fund the provision of adult protective services. The *Inventory of State Adult Protective Services Practices and Service Innovations: APS Practice Survey* is a new data collection that will address these requirements by collecting data from APS agencies in the 50 states, the District of Columbia, and U.S. Territories about the practice variations in APS programs for older adults and adults, obstacles to meeting policy mandates, and practice innovations and model programs that address such barriers and community-identified needs.

#### A2. PURPOSE AND USE OF THE INFORMATION

This is a one-time, voluntary data collection sponsored by ACL as part of a program evaluation and technical assistance efforts of APS programs by the Adult Protective Services Technical Assistance Resource Center (APS TARC), an ACL contractor. This survey will provide a more thorough understanding of APS practices and service innovations of APS programs. The APS Practice Survey will survey all 50 States, the District of Columbia and territories to collect comparable information about APS practices.

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The APS Practice Survey specifically seeks to identify practice innovations and model programs that address community-identified needs and facilitate meeting policy mandates. It also seeks to identify practice variations in the way APS programs serve older adults and adults with disabilities.

The results of the survey will serve to advance the field of APS and will be useful to many audiences. It will provide baseline information regarding the status of APS programs and services and the resulting information will help states compare their program characteristics with those of other states. The survey will provide a context and data for other researchers examining APS programs, including the current APS evaluation being conducted by the APS TARC. It will inform ACL's efforts to support improvement of APS programs through activities such as innovation grants and the ongoing revision process for the National Voluntary Consensus Guidelines for APS Systems. Finally, it will inform the APS TARC team's efforts to develop resources to enhance APS programs around the country.

### **A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION**

ACL is committed to complying with the E-Government Act, 2002 to promote the use of technology. Survey respondents will complete a web-based survey (see Appendix A) that will be programmed using Survey Monkey™ or similar online web-based software.<sup>1</sup> This data collection method will reduce the time burden for respondents and allow them to complete the survey at their convenience, to save their responses, and complete the survey later. The web-based survey will be delivered to all respondents, regardless of location, on the same day and may be easily submitted immediately after completion, a distinct advantage for a survey of 50 States, the District of Columbia and territories. Respondents can return their completed survey electronically, which eliminates the need for them to mail a hard-copy survey. This web-based survey features skip patterns, which reduce the burden on respondents because they do not have to read through questions they are not appropriate for them to answer.

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<sup>1</sup> Survey Monkey™ is a commercial survey-programming tool used to program survey instruments for online administration and is approved by the Federal Government for use by agencies.

This method is the most cost-effective for surveying the population for this study, who are professionals with access to the Internet and computers in their offices. For these reasons, the APS TARC will send survey invitations via e-mail with a link for respondents to access the survey.

#### A4. EFFORTS TO IDENTIFY DUPLICATION. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION

This survey does not duplicate any other efforts. It is part of the first-ever national APS program evaluation. We have reviewed the literature of research on APS practices and have identified a significant gap in information about specific APS intake, investigation, service delivery, and quality assurance practices. The National Adult Protective Services Association (NAPSA) conducted a survey of State APS practices in 2012. (Advancing States, a national trade association, recently updated the survey by surveying its members but not all APS programs.) While the NAPSA survey contained a few questions on similar topics, it was focused on a broader understanding of APS programs rather than on in-depth casework practice issues. APS practice has evolved considerably during the last nine years so the practice information in the survey is out of date. No other national survey related to APS practice has been undertaken.

ACL is sponsoring a data collection to study outcomes of APS programs. The study, by New Editions Consulting, is focused on client outcomes and not APS program practice. The purpose of the studies and data collection questions are different.

The National Adult Maltreatment Reporting System (NAMRS), sponsored by ACL, collects descriptive data on state agency policies through the Agency Component. No information collected through NAMRS is included in the APS Practice Survey. ACL, as part of the APS TARC program evaluation, has also reviewed in depth state APS policies through the examination of written extant information. No data collection burden was involved in that effort and this survey will not duplicate any of that work. NAMRS collects administrative data, including a few policy questions, but does not include any questions about APS practice or innovations.

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While several national surveys or studies have examined issues and concerns of older Americans and adults with disabilities, none of these has addressed state and local APS agencies practices for investigating adult maltreatment. For example:

- The National Survey of Older Americans Act Participants (NSOAAP) (OMB No. 095-0023) is a representative sample of older Americans who are receiving OAA services, including case management, congregate meals, home delivered meals, homemaker, transportation, and family caregiver. It collects detailed information on the services received. (See <https://aoasurvey.org/default.asp>)
- The Health and Retirement Study (HRS) (NIA U01 AG009740) is a longitudinal panel study of a representative sample of 20,000 Americans over the age of 50 and is conducted every 2 years. The study focuses on labor force participation and health transitions. (See: <http://hrsonline.isr.umich.edu/>)
- The National Study of Caregiving is a nationally representative sample of persons age 65 or older who receive assistance with daily activities. (OMB No.: 0920-0780) Telephone interviews are conducted with individuals who have friends or relatives participating in the National Health and Aging Trends Study (NHATS). (See <http://www.nhats.org/scripts/participant/nsocoverview.htm>)
- The National Survey of Residential Care Facilities was conducted in 2010 and collected data on service providers, their staffs and services, and their residents. (OMB No.: 0985-0052) (See <http://www.cdc.gov/nchs/nsrcf.htm>)
- The National Core Indicators (<http://www.hsri.org/project/national-core-indicators/overview/>) was developed by HSRI and the National Association of State Directors of Developmental Disabilities Services is used for quality management of state agencies. Forty states participate in one or more of the standardized surveys including a consumer survey, family survey, and a provider survey. The family survey includes a question about knowing how to report abuse or neglect, but does not collect information on maltreatment.

### **A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES**

No small businesses will be involved in this study.

### **A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY**

This is a one-time only data collection and is a necessary component of meeting the requirements of the Elder Justice Act, passed in 2009.

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The information is critical to assist ACL in making programmatic decisions in terms of priorities, areas of focus, and funding of improvements in the field. The information is also critical to provide effective and efficient technical assistance to APS programs; without the survey, the APS TARC relies on incomplete or ad hoc information to answer program technical assistance questions. The burden to respondents has been reduced to the minimum using technology and the pretesting of questions. If this data collection is not conducted, we will lose valuable information about the scope of practice and the evolving barriers and promising practices in the field.

### **A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5**

This information collection fully complies with 5CFR 1320.5 and does not require any special circumstances.

- Respondents complete the survey only once.
- Respondents are being asked to return their surveys within 45 days.
- Respondents will complete an electronic survey; no paper documents will be required.
- Respondents will not be asked to retain any records.
- This is not a statistical survey and does not require a statistical data classification.
- This survey does not contain any questions requiring confidentiality.
- This survey does not contain any questions regarding trade secrets or confidential information.

### **A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION**

This survey previously ran a 60-day FRN in [83 FR 66276](#) on 12/26/2018. As required under the PRA we are providing the public an opportunity to comment on any changes or updates applied to this IC since the 2018 publication.

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ACL published an abbreviated public comment period for an additional 30-days prior to publication of a 30-day FRN and submittal to OMB in FR 85 77218 on 12/1/2020. A 30-day FRN published in FR 86 11543 on 2/25/2021, there were no public comments received during either comment period.

Any changes to the survey from the initial 60-day FRN publication are incorporated into this version for submittal to OMB.

The APS TARC Evaluation team requested voluntary participation from nine States to pilot test the survey. Members of the pilot test group were asked to provide recommendations on data collection procedures, to provide their views on the availability of data being requested, and to pre-test the survey instrument between July 13, 2017 and July 26, 2017. The Pilot Test Group participated in one focus group via teleconference to provide feedback on the survey on July 26, 2017. An additional phone interview was conducted on September 27, 2017 with one state who was unable to participate in July. Table A8 below lists the State agency representatives who participated in these focus groups as subject matter experts for the instrument design.

**Table A8. Subject Matter Experts and Consultants**

Invited State	Declined /Unavailable	Participated /Provided Feedback	Name and Contact Information
Arizona		X	Amy McKlindon Program Improvement Manager Department of Economic Security <a href="mailto:amymcklindon@azdes.gov">amymcklindon@azdes.gov</a>
Georgia		X	David Hay Senior Field Operations Manager GA Division of Aging Services <a href="mailto:david.hay@dhs.ga.gov">david.hay@dhs.ga.gov</a>
Iowa	X		
Illinois		X	Lois Moorman APS Program Administrator Department on Aging <a href="mailto:lois.moorman@illinois.gov">lois.moorman@illinois.gov</a>
Missouri		X	Kathryn Sapp

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			Bureau Chief, Div. Senior & Disability Srvs., Department of Health & Senior Services <a href="mailto:Kathryn.sapp@health.mo.gov">Kathryn.sapp@health.mo.gov</a>
Minnesota	X		
New Hampshire		X	Rachel Lakin APS Program Operations Administrator Department of Health and Human Services <a href="mailto:Rachel.Lakin@dhhs.nh.gov">Rachel.Lakin@dhhs.nh.gov</a>
New York		X	Lisl Maloney Adult Services Program Representative Office of Children & Family Services <a href="mailto:Lisl.Maloney@ocfs.ny.gov">Lisl.Maloney@ocfs.ny.gov</a>
Ohio		X	Amy Welling Program Developer Department of Job & Family Services <a href="mailto:amy.welling@jfs.ohio.gov">amy.welling@jfs.ohio.gov</a>
Oregon		X	Marie Cervantes Senior APS Program Manager Office of Investigations & Training <a href="mailto:marie.g.cervantes@state.or.us">marie.g.cervantes@state.or.us</a>
Pennsylvania	X		
Tennessee		X	Renee Bouchillon APS Program Supervisor Department of Human Services <a href="mailto:Renee.Bouchillon@tn.gov">Renee.Bouchillon@tn.gov</a>
Texas	X		
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**A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS**

No payment or gift will be provided to respondents.

**A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

There are no assurances of confidentiality. The survey instrument does not contain any sensitive data or any personally identified information linked to individual APS clients.

The survey respondents are State employees, responding on behalf of their agencies, and their names are collected for contact purposes but will be removed from all data sets. Data will be identified only by the name of the state agency that responded.

**A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE**

The survey does not include questions of a sensitive nature.

**A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION**

A. The study sample will include 56 state, the District of Columbia, and territory APS Program Managers. Study participation will involve completing a one-time web-based survey. Details are provided in Table A12.A. Non-respondents are those states that discuss participation in the survey but decide not to participate.



**Table A12.A. Estimates of Hour Burden to Respondents and Non-Respondents**

Respondent Description	Type of Data Collection	Sample Size	RESPONDENTS					NON-RESPONDENTS					GRAND TOTAL
			Estimated Number of	Frequency of Response	Total Annual Responses	Average Hours per Response	Subtotal Estimated Annual Burden (Hours)	Estimated Number of Non-Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (Hours)	Subtotal Estimated Annual Burden (Hours)	Grand Total Annual Burden Estimates (Hours)
State APS Program Manager	Review and respond to communications	56	51	1	51	0.5	25.5	5	1	5	0.5	2.5	28
State APS Program Manager	Complete online survey	56	51	1	51	3	153	5	1	5	0	0	153
<b>TOTAL</b>		<b>56</b>	<b>51</b>	<b>1</b>	<b>51</b>	<b>3.5</b>	<b>178.5</b>	<b>5</b>	<b>1</b>	<b>5</b>	<b>0.5</b>	<b>2.5</b>	<b>181</b>

B. Table A12.B below illustrates the estimated annualized cost to respondents for the hours of burden for this data collection. For State APS program managers, with a median hourly wage rate of \$34.07,<sup>2</sup> the total cost burden would be \$6,167.

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<sup>2</sup> The Bureau of Labor Statistics (BLS) mean annual wage for Social and Community Services Managers (occupation code is 11-9151) is \$70,870; \$34.07 /hour.

**Table A12.B. Annualized Cost to Respondents**

<b>Respondents</b>	<b>Data Collection</b>	<b>Total Burden Hours</b>	<b>Hourly Wage Rate</b>	<b>Respondent Cost</b>	<b>Non Respondent Cost</b>	<b>Total Cost</b>
State APS Program Managers	Review and Respond to Communications	28	\$34	\$869	\$85	\$954
State APS Program Managers	Online Survey	153	\$34	\$5,213	0	\$5,213
<b>Total</b>		<b>181</b>		<b>\$6,081</b>	<b>\$85</b>	<b>\$6,167</b>

**A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN**

There is no other cost to respondents.

**A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

<b>AGENCY</b>	<b>Annualized Cost</b>
ACL	\$ 20,000
Contractor Staff	\$123,000
Total	\$143,000

**A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS**

This is a new information collection request there is a program change increase of 181 annual burden hours.

**A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE**

The APS TARC Evaluation team will collect data via the web-based survey during approximately a one-month period. After the data collection, the APS TARC Evaluation team will convert accepted survey results into analysis-ready formats.

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During the analysis phase the Evaluation team will generate a description of practices within each of the main functional areas of APS identified in the logic model, including administration, intake, investigation, post-investigation services, and quality assurance.

The Evaluation team will summarize quantitative data using a statistical package such as SPSS and calculate descriptive statistics to describe the variation in data across the States and percentage of States that have implemented a certain policy, procedure, practice, or initiative. For qualitative analyses of open-ended survey items, the Evaluation team will use qualitative analysis techniques, including potential use of software such as ATLAS.ti, to examine common themes in the data.

After analyzing the data, the Evaluation team will submit a final report to ACL. The report will include an executive summary, an overview of the study and study methods, a discussion of study findings, limitations, qualification and remaining issues. The Evaluation team will also present findings in a briefing to ACL staff. The schedule for data collection, analysis, and reporting shown in Table A16 below.

**Table A16. Project Time Schedule**

<b>Subtasks / Deliverables</b>	<b>Target Start Date</b>	<b>Target Delivery Date</b>
Finalize Programming of Web-Based Survey	3/9/21	3/15/21
Recruit APS Agencies	3/1/21	3/5/21
Collect Data	4/30/21	5/14/21
Conduct Data Analysis	5/17/21	6/16/21
Final Data Analysis Tables	6/17/21	6/30/21
Final Outline of Final Report	5/14/21	5/14/21
First Draft of Final Report	7/1/21	7/31/21
Final Report	8/1/21	8/31/21
Briefing	9/1/21	9/28/21

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**A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE**

The OMB number and expiration date will be displayed on the survey.

**A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19**

There are no exceptions to the certification.