

# Contact After Adoption or Guardianship: Child Welfare Agency and Family Interactions

OMB Information Collection Request  
0970 – 0567

## Supporting Statement

### Part A

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**Alternative Supporting Statement 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 non substantive change to extend the web survey data collection period and initiate stakeholder interviews prior to the completion of the web survey. Data collection for this project has begun; however, turnover among state adoption program managers is higher than originally anticipated. Several new adoption program manager respondents have been identified. These new respondents will benefit from more time to complete the web survey. There is no change requested to the original timeline; we still expect data collection to be complete prior to the current expiration date.
  
- **Description of Request:** The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services seeks approval for a one-time study to examine child welfare agency family contact activities. The primary goal is to learn more about the intentional and unintentional ways public child welfare agencies are in contact with or receive information about the well-being of children and youth who have exited the foster care system through adoption or guardianship - in particular, information about the experiences of these children and youth with instability in those placements. A secondary goal is to investigate how and what information a child welfare agency tracks about children and youth who have exited the foster care system to adoption or guardianship. This study will use a multimode approach that includes up to two web surveys of state program managers and video-conference interviews with stakeholders from select child welfare agency locations. This study is not intended to be generalized beyond the child welfare agencies selected. 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

Researchers know little about how many families struggle to care for the children and youth they have adopted or assumed guardianship of, the nature of those struggles, and how often formal or informal instability occurs.<sup>1</sup> Furthermore, we do not have information on the well-being of children and youth who exited foster care to adoption and guardianship. Those who work in the child welfare field have expressed concern (often based on anecdotal reports) that some subsidy payments intended for care of children who have exited foster care through adoption or guardianship go to families no longer caring for the children or youth they are intended to help. Anecdotal reports also describe children and youth in adoptive and guardianship homes who contact child welfare agencies, reporting that they do not have a place to stay. Yet, we have little to no information on how often these events occur and whether agencies keep track of these events. Collecting data about the contact parents or guardians, children, and other community members have with child welfare systems about children who exit foster care could provide information about children and families' overall well-being after adoption and guardianship finalization as well as the potential or capacity of child welfare agencies to track information about well-being.

No legal or administrative requirements necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

### A2. Purpose

#### *Purpose and Use*

The purpose of the data collection is to understand the intentional and unintentional ways public child welfare agencies<sup>2</sup> are in contact with or receive information about the well-being of children and youth who have exited the foster care system through adoption or guardianship – in particular, information about the experiences of these children and youth with placement instability after adoption or guardianship. This study will investigate how and what information a child welfare agency tracks about children and youth who have exited the foster care system to adoption or guardianship. Child welfare agencies may have formal and/or informal procedures in place to identify children and youth who have reentered foster care after adoption or guardianship or experienced other forms of instability (e.g., running away, becoming homeless). These formal and informal systems may serve as an important source of information to help identify post adoption or guardianship instability.

The information collected will be used to:

- Describe current agency post adoption and guardianship contact procedures,

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<sup>1</sup> For this study, we define formal instability primarily as a reentry into foster care after the adoption has been finalized and before age 18. Informal instability refers to temporary interruptions in caregiving or informal separations—for instance, placement in a residential treatment center or group home (temporary interruption in care), as well as runaway or homeless periods, being locked out of home or time spent living with relatives or other adults (informal separations).

<sup>2</sup> For the purpose of this study, we are only referring to public agencies. The primary scope does not include private agencies. The only time when private agencies may be relevant is within the video-conference interviews. Public child welfare agencies may describe contractual relationships with private providers and recommend some private provider representatives for stakeholder interviews.

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- Describe the ways that child welfare agencies use information gathered about families after adoption or guardianship,
- Describe agencies' capabilities to collect, maintain, and utilize administrative data of children who exit foster care into adoption or guardianship and children who reenter foster care,
- Identify practices that to inform the development of a toolkit or other resources to help child welfare agencies develop and/or strengthen post adoption and guardianship tracking and contact procedures, and
- Inform ACFs learning agenda and possible future research activities around promoting permanency for children after adoption and guardianship.

The information collected is meant to help build the body of knowledge about the extent to which agencies receive information about the well-being of children and youth who have exited the foster care system through adoption or guardianship. It is not 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*

This study will address 4 research questions (RQs):

- **RQ 1.** What contact do child welfare agencies initiate with families after adoption or guardianship, and to what extent does this contact provide information on the well-being of the child or youth?
- **RQ 2.** What contact do families (children, youth, parents, or guardians) initiate with child welfare agencies after adoption or guardianship and to what extent does this contact provide information on the well-being of the child or youth?
- **RQ 3.** How do child welfare agencies use the information gathered about families after adoption or guardianship?
- **RQ 4.** To what extent do child welfare agencies track information about families post adoption and guardianship? What challenges do child welfare agencies experience in tracking instability formally and systematically?

### *Study Design*

This study will conduct up to two web surveys administered to state adoption program managers<sup>3</sup>, one web survey focused on adoption practices and one focused on guardianship practices. All state adoption program managers will receive the *Agency Web Survey on Adoption (Instrument 1a)*. Only adoption program managers from the 45 states that have a federally subsidized guardianship program (i.e., Kin-GAP) will also be asked to complete a separate survey, the *Agency Web Survey on Guardianship (Instrument 1b)*. There will be 50 possible respondents (from the 50 states); up to 45 of these respondents will be asked to complete the 2 web surveys.

The *Agency Web Survey on Adoption (Instrument 1a)* will gather general information about child welfare agency post adoption contact with families (initiated by agencies and families) and other community

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<sup>3</sup> A separate survey specific to post guardianship will be administered to states that have a child welfare agency staff member responsible for guardianship cases. Every state adoption manager will be asked at the beginning of the first web survey whether their state has this separate agency staff member.

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members, types of information received, and capacity to track or record these contacts. This survey will also gather information about the procedures that child welfare agencies use to gather and/or receive information about children who have exited foster care through adoption, and their families (hereinafter referred to as contact procedures). The *Agency Web Survey on Guardianship (Instrument 1b)* will gather similar information but specific to contact with guardianship families. Additionally, the results from the two web surveys will be used to select certain state child welfare agencies to participate in a series of stakeholder video-conference interviews.

Once the web survey portion of the study is initiated, six child welfare agencies will be selected to complete video-conference interviews with some of their agency stakeholders. See section B2 of Supporting Statement B for selection criteria. Information gathered during the video-conference interviews will expand on the content gathered in the web survey. Prior to each video-conference interview, the study team will review existing documentation associated with each site’s post adoption and guardianship contact procedures to understand each site’s procedures prior to the interviews. This documentation could include procedure manuals, subsidy recertification letters or forms, staff or provider training guides, or examples of agency communications (e.g., recent newsletters, outreach letters). Information gathered from the document review will be used to streamline information gathered within the stakeholder video-conference interview. Each agency in-depth video-conference interview will be facilitated by the *Stakeholder Interview Discussion Guide (Instrument 2a and Instrument 2b)*. Similar to the web survey portion of the study, there are two instruments associated with video-conference interviews: one for adoption specific contact and protocols and one specific to guardianship contact protocols. There will be up to 7 stakeholder interviews conducted per agency, for a total of 42 interview. We expect that approximately 30 of these interviews will focus on adoption and 12 on guardianship. These interviews will gather child welfare agency-specific details about post adoption and guardianship contact procedures, information gathered, and post adoption and guardianship contact tracking and linkage capacity.

This is a one-time data collection effort, and data collection will occur over a 12-month period. The study will use purposive, or convenience, sampling to select agencies for the stakeholder interviews, and although data collection will occur among stakeholders representing several child welfare agencies across the U.S., child welfare practices vary significantly by agency, and sampled agencies will not necessarily be representative of, or generalizable to, other child welfare agencies across the country. Agencies with more innovative approaches to contacting families after adoption or guardianship, and/or tracking and linkages capabilities, will be selected for stakeholder interviews in order to build information and inform future research and practice. More detail on study design, sampling, and data collection procedures are found in Supporting Statement B. Table 1 describes the instruments to be included.

**Table 1. Instrument Summary**

<i>Instrument(s)</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Agency Web Survey on Adoption <i>(Instrument 1a)</i>	<b>Respondents:</b> 50 state adoption program managers	<b>Mode:</b> Web

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	<p><b>Content:</b> Types of agency-initiated routine contact post adoption, types of family-initiated contact to agencies, instability events after adoption finalization, support for administrative data linkage on adoption cases</p> <p><b>Purpose:</b> Describe current agency post adoption practices</p>	<p><b>Duration:</b> 20 minutes</p>
Agency Web Survey on Guardianship ( <i>Instrument 1b</i> )	<p><b>Respondents:</b> Up to 45 adoption program manager staff representing states with federal guardianship programs</p> <p><b>Content:</b> Types of agency-initiated routine contact post guardianship, types of family-initiated contact to agencies, support for administrative data linkage</p> <p><b>Purpose:</b> Describe current agency post guardianship practices</p>	<p><b>Mode:</b> Web</p> <p><b>Duration:</b> 15 minutes</p>
Stakeholder Interview Discussion Guide on Adoption ( <i>Instrument 2a</i> )	<p><b>Respondents:</b> 30 data managers, services coordinators, post adoption case managers, and/or service providers at 6 child welfare agencies selected for video-conference interviews (up to 7 stakeholder interviews per agency)</p> <p><b>Content:</b> Detailed characteristics of agency post adoption practices including: Agency-initiated contact with adoptive families; family-initiated contact with agency; agencies' abilities to track instability after adoption; administrative data tracking and linkage capabilities; and contact and tracing outside of agency.</p> <p><b>Purpose:</b> Gather in-depth information about agency post adoption practices</p>	<p><b>Mode:</b> Video-conference interviews</p> <p><b>Duration:</b> 90 minutes</p>
Stakeholder Interview Discussion Guide on Guardianship ( <i>Instrument 2b</i> )	<p><b>Respondents:</b> 12 data managers, services coordinators, post guardianship case managers, and/or service providers at 6 child welfare agencies selected for video-conference interviews. Note that</p>	<p><b>Mode:</b> Video-conference interviews</p> <p><b>Duration:</b> 90 minutes</p>

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	<p>these respondents will likely be a subset of those selected for the <i>Stakeholder Interview Guide on Adoption</i>.</p> <p><b>Content:</b> Detailed characteristics of agency post guardianship practices including: Agency-initiated contact with guardianship families; family-initiated contact with agency; agencies' abilities to track instability after guardianship; administrative data tracking and linkage capabilities; and contact and tracing outside of agency.</p> <p><b>Purpose:</b> Gather in-depth information about agency post guardianship practices</p>	
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The stakeholder video-conference interviews are intended to gather rich detail about child welfare agencies' experiences with post adoption and guardianship outreach and family contacts. Video-conference interviews will be conducted with a small sample (six) of child welfare agencies and results are not intended to promote statistical generalization to other child welfare agencies. This study will use survey data and case studies to describe agency practices related to agency contact with families after they have exited foster care through adoption or guardianship. This study will inform ACF's learning agenda and possible future research activities around promoting permanency for children after adoption and guardianship. This study will not formally assess the impact of these practices on program participant outcomes. Limitations will be clearly stated in written materials.

*Other Data Sources and Uses of Information*

No other data sources will be used in this study.

**A3. Use of Information Technology to Reduce Burden**

Adoption program managers will have 8 weeks to complete the web-based surveys, allowing them to start and stop the survey so that they can complete it when they have availability throughout those weeks. We have focused on reducing administrative burden of the survey experience for respondents. For example, we designed the survey questions to be highly structured with close-ended response options. Additionally, to minimize respondent burden and encourage maximum participation, the web surveys are designed so respondents can complete each separate survey in 20 minutes or less. Furthermore, we have separate surveys focused on post adoption and guardianship practices. This was done so that state program managers whose states do not have a federal guardianship program, will just take one survey (*Instrument 1a*). Throughout the survey, definitions will be displayed on the screen to clarify terms to survey respondents. The web survey program will automatically eliminate routing errors to ensure that responses are entered accurately.

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

This study does not request information from respondents that exists or is being collected elsewhere.

**A5. Impact on Small Businesses**

This data collection does not involve small businesses.

**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 August 7, 2020, Volume 85, Number 153, page 47970, and provided a 60-day period for public comment. During the notice and comment period, two comments were received. One comment did not address prompts within the Federal Register Notice; it did not pertain to the proposed study's information collection process. The second comment (Attachment G) expressed concerns about the feasibility of collecting post adoption and guardianship instability data and conducting interviews with parents or guardians. Since the study will not collect instability data from state or county agencies and will not interview parents or guardians, the comment's concerns about data quality and burden do not pertain to the study's data collection process. This comment does highlight the complexity of this data collection process for county-administered state child welfare agencies. In response to this concern, we added language to the web survey instructions that clarifies how adoption program managers from county-administered states should complete the survey. We also added a section to the end of the web survey where respondents can nominate innovative county-level agencies for participation in stakeholder interviews. This will allow the opportunity for stakeholder interviews to possibly include both state and county-level respondents.

*Consultation with Experts Outside of the Study*

The project team consulted with four experts external to the project team to inform the study design and data collection instruments. These experts offered advice about the conceptualization of the study design. These individuals reacted to proposed study aims, research questions, methods, and topics considered for inclusion in study interviews. Experts, affiliations, and consultation domains are outlined in **Table 2**.

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**Table 2. Expert Consultants**

Expert Consultant	Affiliation	Consultation Domain
Becci Akin	University of Kansas	Child Welfare; Foster Care; Adoption; Children's Mental Health; Implementation Science; Intervention Research; Community-Based Research; Evidence-Based Practice; Social Work Administration and Management
Zoë Breen Wood	Case Western Reserve University	Practitioner, researcher, educator, and consultant in the fields of social work practice, policy, and education.
Betty Berzin	Formerly the Assistant Director, NJ Department of Children and Families (retired)	Former Adoption Program Manager in New Jersey; Extensive background in collecting and using information related to adoption and guardianship families in her state.
Christine Feldman	Former provider of post-permanency services in Illinois; worked as a Site Implementation Manager in Illinois for QIC-AG	Former manager of post-adoption programs in Illinois; Extensive background in collecting and using information related to adoption and guardianship families in her state.

**A9. Tokens of Appreciation**

No tokens of appreciation will be provided for this study.

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

*Personally Identifiable Information*

Personally Identifiable Information will not be collected in this study.

*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.

Neither survey respondents nor stakeholders selected for video-conference interviews will be identified by name. However, it is possible that the Children’s Bureau and others working in child welfare will be able to discern the identities of the respondents based on the states that participate, and the limited

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number of adoption and guardianship specific staff in each location. We cannot guarantee confidentiality. However, respondents will not be providing information about themselves, instead the data collected relates to agency practices.

This study was reviewed by RTI's Institutional Review Board (IRB) and determined not to be human subjects research.

### *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.

RTI has established data security plans for handling data during data collection, as follows:

- All data collection devices are encrypted with Federal Information Processing Standard (FIPS) 140-2 compliant software and stored in restricted share drives that are available only to authorized project team members through 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 and need-to-know.
- Access to project file shares, systems, and data is strictly controlled by role-based security in the form of Windows security groups. Individuals' 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. Project leaders audit security group membership quarterly to ensure that only those who still need specified access continue group membership.

Stakeholder interviews, to be conducted by Case Western Reserve University (CWRU) or East Carolina University (ECU), will be conducted using the CWRU Zoom account. CWRU has the following data security plans for handling the stakeholder interviews within Zoom:

- The CWRU Zoom account requires a password for participation. Each videoconference will have a unique password. This password will only be shared with the project team and agency video conference participants.
- The interviews will be recorded and the Zoom-created transcriptions will be saved. The recording will be password protected. A 150-day retention period will be applied to Zoom Cloud recordings. After the 150-day period, a Zoom recording will be sent to Zoom's recording trash for 30 days and then deleted permanently.
- All staff working at CWRU or ECU on this project have been certified by the Collaborative Institutional Training Initiative (CITI).

### **A11. Sensitive Information**<sup>4</sup>

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<sup>4</sup> Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, 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 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

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This study does not collect sensitive information.

### A12. Burden

#### *Explanation of Burden Estimates*

We estimate that up to 50 respondents will participate in the *Agency Web Survey on Adoption (Instrument 1a)* and up to 45 out of those 50 respondents will also fill out the second *Agency Web Survey on Guardianship (Instrument 1b)*. On average, the adoption web survey is estimated to take 20 minutes and the guardianship web survey is estimated to take 15 minutes. Using a standard estimated time for question completion, the project team calculated the burden by averaging the time to complete the minimum and maximum number of survey items a respondent could be asked based on varying skip patterns.

Then, 6 agencies will be selected for the stakeholder video-conference interviews. Up to 7 stakeholders will be selected to be interviewed at each site, for a total of up to 42 stakeholders across the 6 agency sites. We expect approximately 30 of these 42 to complete interviews focused on adoption and approximately 12 to complete interviews focused on guardianship. On average, stakeholder interviews following the *Stakeholder Interview Discussion Guides (Instrument 2a and 2b)* will each last 90 minutes. We also expect that stakeholders will need 30 minutes to review email messages, schedule the interview and prepare documents for review.

#### *Estimated Annualized Cost to Respondents*

To compute the total estimated annual cost, we multiplied the total burden hours by the average hourly wage for each participant, according to first-quarter 2019 data available from the Bureau of Labor Statistics.<sup>5</sup> Since the majority of the web survey and stakeholder discussion guide respondents will likely be social workers, the project team used the mean hourly wage for social workers (\$30.12 per hour). To account for fringe benefits the rate was multiplied by 1.5 which is \$45.18.

**Table 3** provides annual and total burden and cost estimates to respondents.

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Amendment; receipt of economic assistance from the government (e.g., unemployment, WIC, or SNAP); immigration/citizenship status.

<sup>5</sup> [https://www.bls.gov/oes/current/oes\\_nat.htm#21-0000](https://www.bls.gov/oes/current/oes_nat.htm#21-0000)

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**Table 3. Estimated Annualized Cost to Respondents**

<b>Instrument</b>	<b>Total/Annual No. of Respondents</b>	<b>No. of Responses per Respondent</b>	<b>Avg. Burden Hours per Response</b>	<b>Total/Annual Burden (in hours)</b>	<b>Average Hourly Wage Rate</b>	<b>Total/Annual Respondent Cost</b>
Agency Web Survey on Adoption (Instrument 1a)	50	1	.33	17	\$45.18	\$768.06
Agency Web Survey on Guardianship (Instrument 1b)	45	1	.25	11	\$45.18	\$496.98
Stakeholder Interview Discussion Guide-Adoption (Instrument 2a)	30	1	2	60	\$45.18	\$2,710.80
Stakeholder Interview Discussion Guide-Guardianship (Instrument 2b)	12	1	2	24	\$45.18	\$1,084.32
<b>Total Annual Estimates</b>				112		\$5,060.16

**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 \$480,705. Cost details by category are provided in **Table 4**.

**Table 4. Costs to the Federal Government**

<b>Cost Category</b>	<b>Estimated Costs</b>
Project Management	\$170,351
Stakeholder and expert consultant engagement	\$20,421
Data Collection	\$190,518
Analysis and Dissemination	\$67,080
Data Security and Archiving	\$32,335
<b>Total costs over the request period</b>	<b>\$480,705</b>

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**A15. Reasons for Changes in Burden**

This is a new information collection request.

**A16. Timeline**

**Table 5** outlines the key time points for the study and for instrument programming, respondent tracing, data collection, analysis and reporting, and data delivery and archiving.

**Table 5. Agency Study Proposed Data Collection and Analysis Timeline**

Activity	Time Schedule
Collect data	6 months
Clean and analyze data	3 months
Disseminate findings, including reports, practice briefs, slide decks, and manuscript(s)	About 9 months after the start of data collection

**A17. Exceptions**

No exceptions are necessary for this information collection.

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**Attachments**

Instrument 1a: Agency Web Survey – Contact After Adoption

Instrument 1b: Agency Web Survey – Contact After Guardianship

Instrument 2a: Stakeholder Interview Discussion Guide - Adoption

Instrument 2b: Stakeholder Interview Discussion Guide - Guardianship

Attachment A: Children’s Bureau Outreach Email - Agency Web Survey

Attachment B: PAGI Team Staff Follow-Up Email - Agency Web Survey

Attachment C: Staff Consent Form Web Survey

Attachment D: Stakeholder Interview Email Outreach

Attachment E: Stakeholder Interview - Consent Form

Attachment F: Study Information Sheet

Attachment G: Public Comment