To: Jordan Cohen

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

From: Christine Fortunato

Office of Planning, Research and Evaluation (OPRE) Administration for Children and Families (ACF)

Date: January 11, 2021

Subject: Non-Substantive Change Request – National Survey of Child and Adolescent Well-

Being Third Cohort (NSCAW III): Data Collection (Phase 11) (OMB #0970-0202)

This memo requests approval of nonsubstantive changes to the approved information collection, National Survey of Child and Adolescent Well-Being Third Cohort: Phase II (OMB #0970-0202).

Background

In July 2017, OMB approved the new information collection request for Phase II of the National Survey of Child and Adolescent Well-Being Third Cohort (NSCAW III). NSCAW is the only source of nationally representative, firsthand information about the functioning and well-being, service needs, and service utilization of children and families who come to the attention of the U.S. child welfare system. Phase II of the study involves in-person baseline and follow-up interviews and assessments with 4,565 children (aged birth to 17 ½ years), their adult caregivers (e.g., biological/adoptive parents, foster parents, kin caregivers, group home caregivers), and their assigned caseworkers. The study will also involve linking survey data to administrative data, including Medicaid claims data, NCANDS, and AFCARS).

Since March 2020, NSCAW III data collection has been paused due to the COVID-19 pandemic. A total of 3,083 caregiver, 2,188 child, and 2,003 caseworker baseline interviews and 181 caregiver, 143 child, and 20 caseworker follow-up interviews were completed prior to the data collection pause. The contractor has an Infectious Disease Response Team that is closely monitoring COVID-19 metrics rates in the participating NSCAW III counties to determine when it may be safe to resume face-to-face interviewing.

The purpose of the current request is to obtain approval for minor revisions to the Phase II study protocol and materials to reflect the impact of the COVID-19 pandemic, compliance with 2018 HHS human subjects and HIPAA Privacy Rule requirements, and the addition of a non-monetary incentive for adolescent participants ages 11 to 17.

Overview of Requested Changes

This memo requests the following nonsubstantive changes:

- Modifications to survey items/instruments to reflect the impact of the COVID-19 pandemic,
- Modifications to data collection materials to allow for telephone administration of the caseworker survey,
- Modifications to data collection materials to reflect the addition of a non-monetary incentive for adolescent participants ages 11-17,
- Modifications to reflect a slightly higher average child interview administration time across the child age distribution than originally estimated, and
- Modifications to data collection materials to reflect language update requests by the Institutional Review Board and HIPAA Privacy Officer with oversight of the study.

Modifications to survey items/instruments to reflect the impact of the COVID-19 pandemic

Changes requested include the addition of interviewer notes or question text to a subset of items in the child, caregiver, and caseworker surveys (e.g., school-based items, services items) to guide interviewers and respondents to consider both virtual and in-person experiences. These additions are provided in the following section and in *Appendices B-D* (NSCAW III Child interview, Caregiver interview, and Caseworker interview).

Requested Child Interview (Appendix B) Revisions (additions and updates in red):

Y_CH9a: Do you go to school or do your parents teach you at home? FR NOTE: ATTENDING SCHOOL VIRTUALLY OR ONLINE SHOULD BE CONSIDERED AS "GOING TO SCHOOL"

1 = GO TO SCHOOL

2 = TAUGHT AT HOME

3 = NEITHER

 $Y_CH9aa.$ Do you go regularly, that is, most school days?

FR NOTE: CHILDREN WHO ATTEND SCHOOL VIRTUALLY OR ONLINE DURING COVID ARE CONSIDERED ENROLLED.

1=YES

2 = NO

Y_SE1a. How often do you enjoy being in school? Would you say...

FR NOTE: IF CHILD SAYS THEY ARE NOT ATTENDING SCHOOL IN PERSON, PLEASE ASK THEM TO THINK ABOUT THEIR CURRENT SITUATION (REMOTE LEARNING EXPERIENCE).

1= never

2= sometimes

3 = often, or

4 = almost always

5 = NOT APPLICABLE (IF VOLUNTEERED NOT IN SCHOOL, OR HOME-SCHOOLED)

Y_PM9a. How often does your caregiver talk to you about how things are going at school?

FR NOTE: IF THE CHILD SAYS THEY ARE NOT ATTENDING SCHOOL IN PERSON, PROMPT THAT ONLINE/VIRTUAL LEARNING SHOULD BE CONSIDERED.

- 1 = Almost never
- 2 = Once in awhile
- 3 = Sometimes
- 4 = Often
- 5 = Almost always

Y_YH50n1a. In the past 12 months, have you seen a school guidance counselor, school psychologist, or school social worker for emotional, behavioral, learning, attention, or substance abuse problems, or gotten any other sort of help for these problems at school? FR NOTE: ONLINE VIRTUAL MEETINGS WITH SCHOOL GUIDANCE COUNSELORS, SCHOOL PSYCHOLOGISTS, OR SCHOOL SOCIAL WORKERS SHOULD BE INCLUDED.

1 = YES

2 = NO

Y_YH50p1a. In the past 12 months, have you received special help or tutoring in the regular classroom for emotional, behavioral, learning, attention, or substance abuse problems?

FR NOTE: ONLINE HELP OR TUTORING SHOULD BE COUNTED.

1 = YES

2 = NO

Y_YH50q1a. In the past 12 months, have you received services in a special school for students with emotional, behavioral, learning, or substance abuse problems? FR NOTE: ONLINE HELP OR SERVICES OFFERED VIRUTALLY SHOULD BE INLCUDED.

1 = YES

2 = NO

Y_YB23a. I disobey at school.

FR NOTE: IF CHILD SAYS THEY DID NOT PHYSICALLY ATTEND SCHOOL, ASK THEM TO RESPOND THINKING ABOUT THEIR ONLINE/VIRTUAL EXPERIENCE.

- 1 = NOT TRUE
- 2 = SOMEWHAT OR SOMETIMES TRUE
- 3 = VERY TRUE OR OFTEN TRUE

Y_SV1a. In the past 6 months, have you gone to any peer support groups? FR NOTE: ONLINE OR VIRTUAL MEETINGS SHOULD BE INCLUDED.

1 = YES

2 = NO

Y_SV2a. In the past 6 months, have you gone to a "drop-in" or community youth center?

FR: ONLINE OR VIRTUAL MEETINGS SHOULD BE INCLUDED.

1=YES

2 = NO

Y_IJ2a, Y_IJ4a, Y_IJ6a, Y_IJ8a, Y_IJ10a, Y_IJ12a, Y_IJ14a.

Did you see a doctor or nurse for this injury?

Please consider online or telehealth visits.

1 = YES

2 = NO

Y_IJ18a. Did you get medical treatment from a doctor or nurse because you were hurt by someone on purpose?

Please consider online or telehealth visits.

1 = YES

2 = NO

Requested Caregiver Interview (Appendix C) Revisions (additions and updates in red):

P_GH6a. What grade is ^CHILD currently in?

FR NOTE: REMOTE LEARNING, SUCH AS ATTENDING SCHOOL ONLINE COUNTS AS BEING ENROLLED.

preschool 44 NURSERY SCHOOL/PRESCHOOL/HEAD START

kindergrtn 55 KINDERGARTEN 1 FIRST GRADE first second 2 SECOND GRADE third 3 THIRD GRADE fourth 4 FOURTH GRADE fifth 5 FIFTH GRADE sixth 6 SIXTH GRADE 7 SEVENTH GRADE seventh 8 EIGHTH GRADE eighth ninth 9 NINTH GRADE tenth 10 TENTH GRADE 11 ELEVENTH GRADE eleventh 12 TWELFTH GRADE twelfth

vocatech 13 VOCATIONAL/TECHNICAL college 14 ANY YEAR OF COLLEGE ungraded 17 UNGRADED PLACEMENT notinschool 18 CHILD NOT IN SCHOOL tooyoung 19 TOO YOUNG FOR SCHOOL

P_HS13an. Since CH has lived with you/In the last 12 months, about how many days did ^CHILD miss school because of an injury or illness?

FR NOTE: REMOTE LEARNING, SUCH AS ATTENDING SCHOOL ONLINE, COUNTS AS BEING ENROLLED.

DAYS:

P_HS50na. Has child/Since child has lived with you, has ^CHILD seen a school

guidance counselor, school psychologist, or school social worker for emotional, behavioral, learning, attention, or substance abuse problems, or gotten any sort of help for these problems at schools?

FR NOTE: ONLINE/VIRTUAL MEETINGS WITH SCHOOL GUIDANCE COUNSELORS, SCHOOL PSYCHOLOGISTS, OR SCHOOL SOCIAL WORKERS SHOULD BE INCLUDED.

1 = YES 2 = NO

P_HS50n1a. In the last 12 months, has ^CHILD seen a school guidance counselor, school psychologist, or school social worker for emotional, behavioral, learning, attention, or substance abuse problems, or gotten any sort of help for these problems at schools?

FR NOTE: ONLINE/VIRTUAL MEETINGS WITH SCHOOL GUIDANCE COUNSELORS, SCHOOL PSYCHOLOGISTS, OR SCHOOL SOCIAL WORKERS SHOULD BE INCLUDED.

1 = YES 2 = NO

P_HS50oa. Has child/Since child has lived with you, has ^Child received services in a special classroom in a regular school for emotional, behavioral, learning, or substance abuse problems?

FR NOTE: SPECIAL ONLINE VIRTUAL CLASSROOMS SHOULD BE INCLUDED. 1= YES

2 = NO

P_HS50o1a. In the last 12 months, has ^Child received services in a special classroom in a regular school for emotional, behavioral, learning, or substance abuse problems? **FR NOTE: SPECIAL ONLINE VIRTUAL CLASSROOMS SHOULD BE INCLUDED.** 1= YES 2 = NO

P_HS50pa. Has child/Since child has lived with you, has ^CHILD received special help or tutoring in the regular classroom for any of these problems? (INCLUDE EMOTIONAL, BEHAVIORAL, LEARNING, OR SUBSTANCE ABUSE PROBLEMS) FR NOTE: SPECIAL HELP OR TUTORING CONDUCTED ONLINE/VIRTUALLY SHOULD BE INCLUDED.

1 = YES 2 = NO

P_HS50pa1. In the past 12 months, has ^CHILD received special help or tutoring in the regular classroom for any of these problems?

FR NOTE: SPECIAL HELP OR TUTORING CONDUCTED ONLINE/VIRTUALLY SHOULD BE INCLUDED.

1 = YES

2 = NO

P_SR21a1. In the last 12 months, have you attended any organized support groups of self-help groups, including Alcoholics Anonymous, Parents Anonymous, or other support groups? These groups might meet at a community center or church to discuss issues that concern them.

FR NOTE: ATTENDING ONLINE/VIRTUAL MEETINGS OR SUPPORT GROUPS SHOULD BE INCLUDED.

1= YES 2 = NO

Requested Caseworker Interview (Appendix D) Revisions (additions and updates in red): **C_CI5a**. How many home visits, either in-person or virtual, were done during the investigation/assessment? VISITS:

C_LN5aa. While ^CHILD has been in placement how often have his/her parents had supervised visits, either in-person or virtual, with him/her? TIMES:

<u>Modifications to data collection materials to allow for telephone administration of the caseworker survey</u>

Changes requested include adding a telephone administration mode, in addition to the approved in-person mode, for caseworker interviews. Some child welfare agencies have revised their visitor policies in response to the pandemic, creating restrictions on who is allowed onsite. Additionally, some caseworkers are working remotely during the pandemic making it difficult to schedule interviews at agency offices. To support a telephone administration mode, revisions have been made to the introductory section of *Appendix D: Caseworker interview* and to the caseworker lead letter and fact sheet in *Appendix F: Lead Letters and Fact Sheets.* A new informed consent form (*Appendix G-1: Caseworker Telephone Mode Consent Form*) has been created for caseworkers who choose to complete an interview by telephone. Caseworkers will be provided with a copy of the form prior to the interview appointment. The interviewer will read a verbal consent script and record caseworker consent in the computerized survey program.

<u>Modifications to data collection materials to reflect the addition of a non-monetary incentive for adolescent participants ages 11-17</u>

OPRE and OMB have discussed an enhanced incentive strategy for adolescent participants ages 11-17 as a means of increasing response rates among this group. Previously, adolescents were offered a \$20 gift card. Going forward, adolescents will be offered a \$20 gift card plus a small, non-monetary gift approximately equal in value (e.g., a pair of headphones, an art kit, etc. valued at approximately \$20). Changes describing this enhanced incentive for adolescents were made to a subset of forms in *Appendix F: Leader Letters and Fact Sheets* (i.e., Caregiver Lead Letter, Caregiver Fact Sheet, Legal Guardian Lead Letter, Legal Guardian Fact Sheet), and in *Appendix G: Consent and Assent Forms* (i.e., Caregiver Permission for Child Participation, Legal Guardian Permission for Child Participation, and Assent Agreement for Youth Aged 11-17). A new form was created for use with adolescents (*Appendix F-1: Adolescent Fact Sheet*) to help mitigate participant refusals and inform them of the enhanced incentive.

Modifications to reflect a slightly higher average child interview administration time across the child age distribution_than originally estimated

Timing data collected during NSCAW III indicates that the average administration times for baseline and follow-up child interviews take longer than the initial 80-minute estimate and instead take 105 and 90 minutes, respectively. This is largely due to higher administration times among adolescents in comparison to younger children. The team examined the protocols to ensure that only necessary information is included. Changes were made to Sections A2 and A15 of Supporting Statement A to reflect increased burden. Additionally, updates were made to the administration times cited in *Appendix F: Leader Letters and Fact Sheets* (i.e., Caregiver Fact Sheet, Legal Guardian Fact Sheet, Emancipated Youth Fact Sheet, and Young Adult Fact Sheet) and in *Appendix G: Consent and Assent Forms* (i.e., Caregiver Permission for Child Participation).

Modifications to data collection materials to reflect language update requests by the Institutional Review Board and HIPAA Privacy Officer with oversight of the study

The remaining requested changes to materials were directed by the Institutional Review Board with oversight of the study to ensure that the language in all respondent facing materials is clear and aligns with 2018 HHS human subjects and HIPAA Privacy Rule requirements. Changes made to each set of materials are described below.

Requested Revisions to Lead Letters and Fact Sheets (Appendix F)

- The OMB expiration date was updated to 09/30/2023.
- Minor revisions were made to reflect how incentives are provided to children (i.e., gift certificate vs. gift card)
- Language in the Young Adult, Follow-Up (Services) Caseworker, and New Agency (Services) Caseworker Lead Letters and Fact Sheets was revised based on recommendations and feedback provided by the governing Institutional Review Board. These forms are only used in the follow-up wave and had not been reviewed by the Institutional Review Board prior to the 2017 Phase II OMB submission.

Requested Revisions to Consent and Assent Forms (Appendix G)

- The OMB expiration date was updated to 09/30/2023.
- The contact name/address for comments or suggestions about burden was added.
- Language was revised to align with 2018 HHS human subjects guidance describing risks, privacy (particularly privacy offered by the study's Certificate of Confidentiality), incentive procedures, and the storage and destruction of audio recordings made during the interview.

Requested Revisions to Data Linkage Forms (Appendix H)

- The OMB expiration date was updated to 09/30/2023.
- Language was updated and added to align with 2018 HHS human subjects guidance describing risks and benefits of participation, and to specify administrative data sources to be linked to survey data.

Requested Revisions to HIPAA Authorization Forms (Appendix I)

• The OMB expiration date was updated to 09/30/2023.

Language was updated and added to align with HIPAA Privacy Rule and Sharing
Information. A statement was added to explain the extent to which information
disclosed is subject to redisclosure and no longer protected under state/federal laws, a
statement was added to indicate that the caregiver/legal guardian would receive a
copy of the form, and a statement was added to indicate when agreement to link
interview data to Medicaid services would expire.

Time Sensitivities

Although data collection is currently paused, a resumption of NSCAW III baseline in-person interviews is anticipated as soon as COVID-19 infection rates subside, and conditions are deemed safe for both interviewers and participating families.