

Prevention Services Data Collection

**OMB Information Collection Request
0970 - 0529**

Supporting Statement Part A - Justification

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Submitted By:
Children's Bureau
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

Section 471(e) of the Social Security Act (the Act) (42 U.S.C. 671) as amended by Public Law 115-123 allows state and tribal child welfare agencies to receive reimbursement for some of the costs of providing prevention services to certain children and their parents or kin caregivers. The Act requires state and tribal child welfare agencies that provide such services to collect and report to the Administration for Children and Families (ACF) information on children receiving the prevention and family services and programs.

States and tribes must report¹:

- The specific services or programs provided,
- The total expenditures for each of the services or programs provided,
- The duration of the services or programs provided, and
- If the child was identified in a prevention plan as a candidate for foster care:
 - the child's placement status at the beginning, and at the end, of the 12-month period that begins on the date the child was identified as a candidate for foster care in a prevention plan; and
 - whether the child entered foster care during the initial 12-month period and during the subsequent 12-month period; and
- Basic demographic information (e.g., age, sex, race/Hispanic Latino ethnicity).

During the first information collection period the Children's Bureau (CB) had 42 state and tribal jurisdictions opt into the voluntary Title IV-E Prevention Services Program which included opting in to Prevention Services data collection effort. These states and tribes are in various stages of preparing for data collection, and submitting data to the CB. Data submission for these states will continue into future reporting periods. During the next reporting period, CB anticipates that approximately twelve more states and tribes will opt into the voluntary Title IV-E Prevention Services Program, and as a result, will opt into this information collection effort. These states will then begin preparing for and submitting data to the CB. However, since this program is voluntary and therefore this number could fluctuate depending on the individual priorities of child welfare jurisdictions.

2. Purpose and Use of the Information Collection

This information collection fulfills reporting requirements, as described above. The information collected informs state and federal policy decisions, program management, and responses to Congressional and Department of Health and Human Services (HHS) inquiries. Specifically, the information will provide information about the use, expenditures, and availability of prevention services to children to prevent the need for foster care placement. The information collected provides an understanding of the characteristics of children and youth who are receiving programs and services through the Title IV-E Prevention Services

¹ Section 471(e)(4)(E) of the Social Security Act

program.

3. Use of Improved Information Technology and Burden Reduction

Title IV-E agencies transmit data directly to CB through a cloud-based data management system, the National Child Welfare Data Management System (NCWDMS). In interfacing with NCWDMS, Federal Information Security Management Act (FISMA) approved software is used that allows for secure direct communication between the title IV-E agencies and the Federal Government.

4. Efforts to Identify Duplication and Use of Similar Information

The Children's Bureau collects information about children and families that are involved with public child welfare agencies in both NCANDS and AFCARS. However, the Prevention Services Data Collection is not duplicative of these efforts, as information in this information collection is specific to programs and services received in the agency's Prevention Services Program and total expenditures accrued by the public child welfare agency..

5. Impact on Small Businesses or Other Small Entities

This collection will not have an adverse impact on small entities. Respondents are state and tribal child welfare agencies.

6. Consequences of Collecting the Information Less Frequently

In order to reduce the burden on title IV-agencies, and still gather data on a timely basis, we are requiring a semi-annual reporting period. Less frequent data collection would inhibit the timely use of the information by CB to inform federal policy decisions, program management, and responses to Congressional and HHS inquiries.

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

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the 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 November 5, 2021, Volume 86, Page 61276, and provided a sixty-day period for public comment. During the notice and comment period, we received three comments from states and an advocacy agency.

Multiple commenters expressed concern that the total burden hours were likely to be higher than our initial estimate, in part due to the need for reprogramming of existing systems and increased communication and coordination between agencies that do not have formal methods of communication. We based our estimate of the burden on calculations related to the burden estimate for the Adoption and Foster Care Analysis and Reporting System (AFCARS). No commenter provided any specifics with which we could revise our estimate. Over the next year, we will work with states and tribes to ensure our average burden estimate is accurate for this information collection.

A single commenter noted the costs of computer programming that will be added for states and tribes when they first opt in to this new program. We acknowledge that there may be additional costs related to this information collection effort pertaining to agency collaboration and CCWIS development. Federal financial reimbursement is available in allowable at 50% for costs associated with this program.

Multiple commenters expressed concern regarding the format of the data collection which collects information at the child level rather than at the family level. This likely presents a concern as services are often provided at the family level, and agency data collection systems gather information at the family level. The reporting structure is outlined in the legislation, and therefore cannot be changed.

Two commenters expressed concern that this information collection would require the collection and reporting of duplicate information available in other information collections such as AFCARS and the National Child Abuse and Neglect Data System (NCANDS). The exact set of information that is statutorily required for this program does not exist elsewhere. Many of the children that title IV-E agencies will serve in this program are not in foster care and therefore, not reported in AFCARS. Of the information in the data collection, not all of the information is collected every six months. For example, while certain information is reported in each data set such as provision of services, information related to demographics is collected only once (i.e., date of birth, race/Hispanic Ethnicity and sex). Additionally, title IV-E of the Act requires AFCARS be regulated and there are statutory penalties associated with AFCARS. NCANDS is voluntary and does not include all of the information Congress mandated related to this program.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

Information on children receiving prevention services is reported to ACF at the child level and does contain personally identifiable information (date of birth and race/ethnicity). This information is collected to provide an understanding of the characteristics of children and youth who are receiving programs and services through the Title IV-E Prevention Services program. Confidentiality and integrity of data are maintained and monitored based on ACF's system security authorization standards, procedures, and protocols. Additionally, the state or tribe will assign an encrypted record number. Only the sending agency will know this number.

11. Justification for Sensitive Questions

There are no questions of an inherently sensitive nature included in the information collection.

12. Estimates of Annualized Burden Hours and Costs

Information Collection Title	Total Number of Respondents	Annual Number of Responses per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Annual Cost
Prevention Services Data Collection	55	2	31	3,410	\$80.94	\$276,005.40

States and tribes will be reporting information to ACF on a bi-annual basis after they have opted into the program. The estimated time per response is based off information from states from the first period of information collection. Through a phased-in approach, we expect that 55 states and tribes will opt into the Prevention Services Prevention Program, and will submit data to ACF over the next three years.. The burden estimates are based on the estimated burden once all anticipated states have opted into the program and have begun to submit data to ACF.

The job codes are Computer Information and Systems Managers (11-3021) with an average hourly wage of \$77.76, Computer and Mathematical Occupations (15-0000) with an average hourly wage of \$45.08, Office and Administrative Support Occupations (43-000) with an average hourly wage of \$19.37, Social and Community Service Managers (11-9151) with an average hourly wage of \$35.05, and Community and Social Service Operations (21-0000) with an average hourly wage of \$25.09. We reviewed 2020 Bureau of Labor Statistics data. ACF averaged these wages to come to an average labor rate of \$40.47. To ensure we took into account overhead costs associated with these labor costs, ACF doubled this rate (\$80.94). (<https://www.bls.gov/opub/mlr/2017/home.htm>). Therefore, the costs to

respondents is estimated to be \$276,005.40 (3, 410 hours x \$80.94).

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

States and tribes will use existing electronic case record systems to record and collect information pertaining to the case work associated with children and youth receiving prevention services. We acknowledge that there may be additional costs related to this information collection effort pertaining to system coordination and CCWIS development. Federal financial reimbursement is available in allowable at 50% for costs associated with this program.

The cost of collecting and submitting data to CB for states and tribes is subsumed under the agencies' expenses for personnel.

14. Annualized Cost to the Federal Government

Item	Staff Labor	Hours/Activities	Avg. Cost per hour	Annual Total Cost
Operation and analysis of Prevention Services Database	Children's Bureau	3 Staff; Total of 14 hours a week	\$124.10	\$83,395.20
Operation and analysis of Prevention Services Database	Contractor Staff	1 Staff; 12 hours a week	\$155.52	\$89,579.52
Estimated Totals		26 hours		\$172, 974.72

The average annual federal costs associated with operation of the database is based on calculations of federal staff and contractor staff labor. For federal staff, a total of 14 hours a week will be allocated at an average cost per hour of \$62.00. For contractor staff, a total of 12 hours at \$77.76 an hour.

ACF expects costs to continue to rise as more states and tribes participate in the program over time. In order to take ensure we took into account overhead associated with these labor costs, ACF doubled the estimated hourly rate (\$124.10 and \$155.52). Therefore, the average annual cost to the federal government is expected to be \$172, 974.72.

15. Explanation for Program Changes or Adjustments

This request is to continue data collection that is currently approved under OMB # 0970-0529 as required by the Title IV-E Prevention Services legislation. This includes on-going data collection from prior respondents and new respondents. In August 2021, CB made updates to the related technical bulletin and submitted these for OMB approval. No additional changes are proposed through this request for an extension to continue data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

CB will make the information available annually to the public through required reports to Congress.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.