National Youth in Transition Database (NYTD)

OMB Information Collection Request

0970-0340

Supporting Statement Part A - Justification

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Submitted By:

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U.S. Department of Health and Human Services

1. **Circumstances Making the Collection of Information Necessary**

The John H. Chafee Foster Care Program for Successful Transition to Adulthood (42 U.S.C. 677, as amended by Pub. L. 115–123, the Family First Prevention Services Act within Division E, Title VII of the Bipartisan Budget Act of 2018) requires state child welfare agencies to collect and report to the Administration for Children and Families (ACF) data on the characteristics of youth receiving independent living services and information regarding their outcomes.

The regulation implementing the National Youth in Transition Database (NYTD), listed in 45 CFR 1356.80, contains standard data collection and reporting requirements for States to meet the law’s requirements. ACF uses the information collected under the regulation to track independent living services, assess the collective outcomes of youth, and assess performance with regard to those outcomes, consistent with the law’s mandate. There are two information collection instruments associated with this request: the **State Data File** and the **Youth Outcomes Survey**. This request is for an extension with no changes.

1. **Purpose and Use of the Information Collection**

The NYTD is a data collection system that elevates the voices of youth who are transitioning into adulthood. Included in this collection, are data about the services provided by youth serving agencies as well as data about the young people themselves and their long-term outcomes. States use this information to improve the independent living programs that are administered through the state. The Children’s Bureau uses this information to track independent living services, to assess the collective outcomes of youth, and to evaluate state performance with regard to those outcomes consistent with the law’s mandate. The Fostering Connections to Success and Increasing Adoptions Act of 2008 (P.L. 110-351) allowed states to opt to extend title IV-E foster care assistance to youth ages 18 to 21. Consequently, NYTD data are also used to assess the impact of extending foster care supports to youth over age 18. Finally, we make available our raw NYTD data sets to researchers for analysis in our National Data Archive on Child Abuse and Neglect (NDACAN) and through the Cornell University.

1. **Use of Improved Information Technology and Burden Reduction**

States submit the NYTD Data File to ACF in an electronic format. We use Extensible Markup Language (XML) for file transmission consistent with the E-Government Act of 2002 (Public Law 107-347) based, in part, on public responses we received during the NYTD rule-making process. ACF released its final technical specifications for the transmission of NYTD data files in NYTD Technical Bulletin #1. For the NYTD Youth Outcome Survey, many states have opted to collect these data using web-based technologies designed to ease the burden related to collecting and reporting outcomes data on young people.

In order to ensure that states are collecting and reporting regulatory data as required, the Divisions of Performance Measurement and Improvement and State Systems work together with states in the development of their collection systems and data collection processes. We also provide other guidance to states on appropriate and allowable methods for locating youth and administering the survey using technology.

1. **Efforts to Identify Duplication and Use of Similar Information**

Congress specifically mandated that we collect data on independent living services and youth outcomes. Prior to our rule-making, we analyzed the sources and reporting instruments already in use in the collection of independent living services information and concluded that the type of data in the NYTD is not collected elsewhere. Specifically, we examined both federal and non-federal data sources such as:

• Federal data collection systems such as the Adoption and Foster Care Analysis and Reporting System (AFCARS), and the Runaway and Homeless Youth Management Information System (RHYMIS);

• State, county, and local governments with integrated and/or complementary data systems such as Statewide Child Welfare Information Systems (SACWIS) and Comprehensive Child Welfare System (CCWIS); and

• Data collection efforts of non-governmental organizations such as Casey Family Programs, United Way, Lutheran Social Services, Catholic Social Services, Child Welfare League of America, and Public/Private Ventures.

AFCARS collects data on youth who are in foster care or who were adopted under the auspices of state child welfare agencies. Many youth that will be reported by states to the NYTD are also going to be reported to AFCARS. However, youth receiving independent living services may not be in foster care. Most youth in the follow-up population will not be in foster care at ages 19 and 21. Finally, there are separate and different authorizing statutes and penalty structures for NYTD and AFCARS that do not lend themselves to combining the databases. Instead of duplication, we find that NYTD is an important supplement to the data that other programs and private entities collect on transition age youth and their well being.

1. **Impact on Small Businesses or Other Small Entities**

This information collection is required of state agencies only and does not impact small businesses or other small entities.

1. **Consequences of Collecting the Information Less Frequently**

This data collection is mandated by law, therefore we would be out of compliance with the statutory requirements if we did not collect independent living service and youth outcome information. In the regulation, we require that states submit NYTD data to ACF every six months, which is the same reporting frequency as AFCARS. We believe that any less frequent reporting may increase the risk of states reporting inaccurate or missing data. Further, we chose a semi-annual reporting period to preserve our ability to analyze NYTD data along with AFCARS data for the same youth.

1. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

There are no special circumstances required in the collection of this information in a manner other than that required by OMB.

1. **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 Monday, December 27, 2021, Vol. 86, No. 245, page 73295 and provided a sixty-day period for public comment. During the notice and comment period, 1 comment was received, which is attached. The statement was in support of the collection of NYTD data and reinforced the benefit that such collection provides to states and to the young people who are served through our program.

1. **Explanation of Any Payment or Gift to Respondents**

States receive Chafee Program funds and federal financial participation for the maintenance and development of child welfare information systems are made to states to support the delivery of independent living services and NYTD data collection efforts. States are permitted and encouraged to use Chafee funds to provide small incentives to youth to encourage participation in the NYTD Youth Outcome Survey. This is an important tool because youth who are not in care are particularly more difficult to maintain relationships but understanding their experiences and the services that they need are integral to our work with the Children’s Bureau.

1. **Assurance of Confidentiality Provided to Respondents**

NYTD regulation 45 CFR 1356.83 requires states to use an encrypted personal identification number. This measure helps to provide a consistent means of identifying the young person across child welfare systems while maintaining a layer of identity protection for the safety of the youth. We also encourage states to implement an informed consent protocol that informs survey participants about the data collection effort and assures them that their personal data is protected and kept confidential. While not a regulatory requirement, informed consent and assent are best practices in youth centered work as it provides the young person with a sense of decision-making autonomy and provides confidence to young people that their personal experiences will not be linked publicly to their identity. (see NYTD Technical Assistance Brief #5: Designing an Informed Consent Form for Use with the Youth Outcome Survey”).

1. **Justification for Sensitive Questions**

Congress specifically required in law that states collect outcome information on issues of a sensitive nature including rates of non-marital childbirth, incarceration and high risk behaviors. Therefore, we require states to pose questions in the youth survey that ask about these areas of a youth’s life. The survey is voluntary and, as noted in Item #10, we expect states to obtain youth or parental consent, as appropriate.

1. **Estimates of Annualized Burden Hours and Costs**

Pursuant to the NYTD regulation, states submit two semi-annual data files (**the State Data File**)that contain information for each youth in the reporting populations on all data elements regarding independent living services and youth demographics, characteristics, and outcomes. The following burden hour estimates include the estimated time *states* will spend collecting and reporting information contained in the semi-annual data files. Additionally, burden hours are reported for the estimated time *youth* will spend participating in the NYTD survey (**Youth Outcome Survey**).

We have provided separate burden hour estimates for FY2022, FY2023, and FY2024. The average annualized burden and cost estimates (covering all three years of this information collection request) are detailed in the final table in this section, titled “**Annualized burden estimates for the NYTD for the 3-year period corresponding to this ICR, FY 2022 – FY 2024.”**

***FY2022 Burden Estimates***

1. With regard to **the State Data File**, we estimate that there will be a total annual burden of 1,317 hours per State per report period to collect and submit information on (a) *services* and (b) *outcomes* and, (c) for *tracking* purposes, to maintain contact with youth for follow-up surveys.
2. We have estimated the same 1,000 hour burden per State per report period associated with collecting and reporting youth independent living *services*, demographics and characteristics information.
3. In FY2022, States will collect *outcomes* information on the Cohort 4 follow-up population of 19-year-olds. The age 19 follow-up population is a subset of the NYTD baseline population as it includes only youth who participated timely in the survey at age 17. Pursuant to the NYTD regulation, some States may also opt to collect outcomes information on a sample of 19-year-olds instead of the complete follow-up population. For these reasons, our estimate for the age 19 follow-up population is approximately 6,000 youth nationally (or 115 per State) per report period (totaling 12,000 youth annually). We are estimating 45 minutes (0.75 hours) for States to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. This results in a burden estimate of 86 hours per State per report period (172 hours annually).
4. In addition, we are estimating *tracking* burden during this year as we expect most 19-year-olds to have exited foster care. Similar to the 19-year-old population in Cohort 2, we expect most of them will have exited foster care. We are estimating States making up to 12 contacts in FY 2022 to locate and engage a 19-year-old youth in the NYTD survey. Estimating 10 minutes per contact, we anticipate 2 burden hours for tracking the estimated 6,000 19-year-old youth semi-annually in FY 2022, or 231 burden hours per State per report period (462 hours annually).
5. With regard to the **Youth Outcome Survey** instrument, we are estimating 0.5 burden hours for each of the 12,000 youth to listen to the State’s survey instructions and to provide responses to the survey questions, resulting in a total of 6,000 burden hours.

**FY2022**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *Instruments (subcomponents)* | *Number of respondents* | *Number of responses per respondent* | *Average burden per response (hrs)* | *Total burden hours (hrs)* |
| **1. State Data File**  | **52** | **2** | **1317** | **136,968** |
| *Services**Outcomes**Tracking* | *1,000* | *104,000* |
| *86* | *8,944* |
| *231* | *24,024* |
| **2. Youth Outcome Survey** | **12,000** | **1** | **0.5** | **6,000** |
|  **TOTAL burden for both collections** | **142,968** |

***FY2023 Burden Estimates***

1. With regard to **the State Data File**, we estimate that there will be a total annual burden of 1,224 hours per State per report period to collect and submit information on (a) *services* and (b) *outcomes* and, (c) for *tracking* purposes, to maintain contact with youth for follow-up surveys.

a) We have estimated the same 1,000 hour burden per State associated with collecting and reporting youth independent living services, demographics and characteristics information.

b) In FY2023, States will begin surveying a new cohort of youth starting with *outcomes* data collection for another baseline population of 17-year-olds in foster care (Cohort 5). We are estimating 23,000 youth will be in the FY 2023 baseline population, and States will take approximately 45 minutes (0.75 hours) to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. We estimate that there will be on average 221 17-year-old youth in foster care per State per report period, resulting in approximately 166 burden hours (332 hours annually) to record this information. c) We are estimating *tracking* burden during FY 2023 for the Cohort 4 21-year-old follow-up population as we expect States to maintain contact with the estimated 12,000 youth between follow-up survey rounds (surveyed in FY 2022 at age 19 and currently age 20 in FY 2023). In this intervening year between survey rounds, we estimate that States will make three contacts in FY 2023 to maintain a current address and contact information for tracking each State’s follow-up population. Estimating 10 minutes per contact, we anticipate 0.5 burden hours for tracking 231 20-year-old youth in FY 2023, or 58 burden hours per State per report period (116 hours annually). We are not estimating tracking burden during this year for the baseline population as we expect States to know the whereabouts of the 17-years-olds still in foster care.

1. With regard to the **Youth Outcome Survey** instrument, we are estimating that it will take the estimated 23,000 youth nationwide approximately 30 minutes (0.5 hours) to complete the survey, resulting in a total of 11,500 burden hours.

**FFY 2023**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *Instruments (subcomponents)* | *Number of respondents* | *Number of responses per respondent* | *Average burden per response (hrs)* | *Total burden hours (hrs)* |
| **1. State Data File**  | **52** | **2** | **1,224** | **127,296** |
|  *Services* *Outcomes* *Tracking* | *1,000* | *104,000* |
| *166* | *17,264* |
| *58* | *6,032* |
| **2. Youth Outcome Survey** | **23,000** | **1** | **0. 5** | **11,500** |
|   **TOTAL burden for both collections** | **138,796** |

***FY2024 Burden Estimates***

1. With regard to **the State Data File**, we estimate that there will be a total annual burden of 1,375 hours per State per report period to collect and submit information on (a) *services* and (b) *outcomes* and, (c) for *tracking* purposes, to maintain contact with youth for follow-up surveys.

a. We estimate approximately 104,000 youth will receive *services* semi-annually (2,000 youth per State). Each State will expend on average 30 minutes (.5 hour) to collect the services, demographics and characteristics information from those youth, resulting in an hour burden of 1,000 per State per report period.

b. In FY 2024, States also will collect *outcomes* information on the Cohort 4 follow-up population of 21-year-olds. The same number of youth who were eligible to participate in the survey at age 19 are eligible to participate in the survey at age 21. As such, we are estimating that States will collect outcomes information from 6,000 youth nationally (or 115 per State) per report period (totaling 12,000 youth annually). We are estimating 45 minutes (0.75 hours) for States to explain the purpose of the survey to these youth and to record the outcomes information that will be reported in the data file. This results in a burden estimate of 86 hours per State per report period (172 hours annually).

c. In addition, we are estimating *tracking* burden during this year as we expect most 21-year-olds in Cohort 4 to have exited foster care. Similar to 21-year-old populations in prior cohorts, we are estimating that the majority will have exited foster care. We are estimating States making up to 12 contacts in FY 2024 to locate and engage 21-year-old youth in the NYTD survey. Estimating 10 minutes per contact, we anticipate two burden hours for tracking 6,000 21-year-old youth semi-annually or 231 burden hours per State per report period (462 hours annually). Similarly, we are estimating trackingburden during FY 2024 for Cohort 5 youth (surveyed in FY 2023 at age 17 and currently age 18 in FY 2024) as we expect States to maintain contact with this population between survey rounds. Similar to prior cohorts, we expect States to maintain contact information for the estimated 12,000 youth who will be eligible to participate in the survey in FY2025. In this intervening year between survey rounds, we estimate that States will make three contacts in FY 2024 to maintain a current address and contact information for such youth. Estimating 10 minutes per contact, we anticipate 0.5 burden hours for tracking 18-year-old youth in FY 2024 or 58 burden hours per State per report period (116 hours annually).

1. With regard to the **Youth Outcome Survey** instrument, we are estimating 0.5 burden hours for each of the 12,000 youth to listen to the State’s survey instructions and to provide responses to the survey questions, resulting in a total of 6,000 burden hours.

**FY2024**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| *Instruments (subcomponents)* | *Number of respondents* | *Number of responses per respondent* | *Average burden per response (hrs)* | *Total burden hours (hrs)* |
| **1. State Data File**  | **52** | **2** | **1,375** | **143,000** |
|  *Services* *Outcomes* *Tracking*  | *1,000* | *104,000* |
| *86* | *8944* |
| *289* | *30056* |
| **2. Youth Outcome Survey** | **12,000** | **1** | **0.5** | **6,000** |
|   **TOTAL burden for both collections** | **149,000** |

**Annualized burden and cost estimates for the NYTD for the 3-year period corresponding to this ICR, FY 2022 – 2024**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| *Instruments (subcomponents)* | *Number of respondents* | *Number of responses per respondent* | *Average burden per response (hrs)* | *Total burden hours (hrs)* | *Average Hourly Wage* | *Total Annual Cost* |
| **1. State Data File**  | **52** | **2** | **3916** | **135,755** | **50.36** | **6,836,621.80** |
| **2. Youth Outcome Survey** | **47,000****(15667 average)** | **1** | **0.5** | **7,833** | **36.76** | **287,941.08** |
|   **TOTAL annualized estimates for both collections** | **143,588** | **87.12** | **7,124,562.88** |

The cost to respondents was calculated using two May 2020 Bureau of Labor Statistics (BLS) job codes: 1. for Social and Human Services Assistants [21-1093] and wage data which offers a mean hourly wage of $18.38 per hour and 2. Child, Family, and School Social Workers [21-1021] and wage data which offers a mean hourly wage of $ 25.18. State data are typically collected by assigned social workers whose wages are typically higher while most states outsource youth survey collection to third party transitional living program workers. To account for fringe benefits and overhead, these wage rates were multiplied by two

<https://www.bls.gov/oes/current/oes_stru.htm>

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

We expect that on average business process costs, travel and training, process development, information technology (IT) operational and maintenance costs will be approximately $250,000 per state per year. Because many of these costs can be matched at 50% Federal financial participation for a state that has a Comprehensive Child welfare Information System. (CCWIS, formerly SACWIS), we are estimating a cost burden of $125,000 per state per year (or $62,500 for each of the two responses per year). We do not expect that reporting for NYTD will require the purchase of additional hardware or other capital equipment. For IT system changes, the main costs are in software development and/or modification. We characterize these costs as minor, but we are aware of the impact the cost of implementation has on states. We are not estimating any other cost burden associated with the Youth Outcome Survey instrument because we are not estimating any costs to respondent youth.

We recognize that the reporting and record keeping burden is disproportionately higher for small states because they need to develop the same functionality as large states regardless of the number of youth reported. State costs are not affected by the number of youth in the reporting population or the number of reporting periods. We also recognize that county-administered states may face more challenges in implementation, but see no need to change our cost burden estimates. Each state will have different costs depending on their populations of youth and the changes required in their information systems and business procedures to meet the requirements in the regulation.

1. **Annualized Cost to the Federal Government**

A federal NYTD system was developed and implemented in 2011 to receive, process and store NYTD data submitted by states. Currently, it is estimated to cost the federal government $1,986,000 annually, to operate NYTD. These costs are associated with hosting NYTD on the ACF network and maintaining system related security protocols, such as the Authorization to Operate. However, as NYTD continues to age, the need for maintenance and technological modernization has increased costs. This revised estimate takes into account the costs for maintenance and modernization as well as contractor support for development, onsite reviews and for staffing the NYTD help desk where technical assistance is provided to state users

1. **Explanation for Program Changes or Adjustments**

We are not proposing any material changes to the collection instruments, instructions, or to the uses of the information collection currently approved by OMB.  However, we are making minor adjustments to the burden hours to reflect the use of historic data to arrive at a more accurate depiction of effort. In future requests, we may incorporate additional territories that are awarded Chafee Program funding and who complete the development of their own NYTD compatible reporting systems.

1. **Plans for Tabulation and Publication and Project Time Schedule**

We make annual NYTD data reports available on the Children’s Bureau website at http://www.acf.hhs.gov/programs/cb/resource/data-briefs. We generally issue these reports in October following the fiscal year that is the subject of the data brief. The purpose for this lag time is to allow states the option to resubmit corrected/updated data from the prior year as allowed in 45 CFR 1356.85(e)(1). NYTD data sets also are publicly available to researchers at our National Archive on Child Abuse and Neglect (NDACAN) at http://www.ndacan.cornell.edu/.

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

As in prior information collection requests, we are requesting that the OMB number and expiration date not be displayed for the NYTD Data File as these files will be transmitted electronically to ACF. (Please note that we do currently post the OMB number and expiration date on the web portal states use to submit the NYTD file). We also request that the OMB number and expiration date not be displayed on the NYTD Youth Outcome Survey. While we chose to regulate the survey questions and response options in the Youth Outcome Survey, there is no specified form or format in which states must administer the survey to youth.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification statement.