

State Child Welfare Data Linkages Descriptive Study

**OMB Information Collection Request
New Collection**

Supporting Statement Part A

April 2022

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officer:
Jenessa Malin

**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 new data collection. We are requesting two years of approval.
- **Description of Request:** The Administration for Children and Families and the Office of Planning, Research, and Evaluation is proposing a new primary data collection about connected child maltreatment data. We define connected data as state child welfare administrative data that are linked or integrated with administrative data from other state or county systems or agencies. The State Child Welfare Data Linkages Descriptive Study (SCW Descriptive Study) will gather systematic information on the extent to which states connect their child maltreatment data to other state and county data sets; how any connected data sets are created, managed, and used; and challenges states face in linking data. These data are not available from existing sources. The SCW Descriptive Study aims to provide important information to the field by documenting the capacity of state child welfare agencies to link data sets with other agencies. This study aims to present an internally valid description of the connected data capacity of participating state child welfare agencies, not to promote statistical generalization to different sites or service populations. This request includes the following data collection instruments:
 - Instrument 1: Initial Survey – to be used with state child welfare directors or their designee to provide high-level information on connected data efforts and inform the remaining data collection activities
 - Instrument 2: Connected Data Survey – to collect more detailed information about connected data efforts from staff with expertise as identified by the child welfare director or their designee
 - Instrument 3: Interview Guide – to capture more nuanced aspects of each state’s experiences creating, managing, or using connected data from state child welfare directors and additional state and county staff

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

Child maltreatment remains a serious problem in the United States. In fiscal year 2019, child protective services agencies nationwide received about 4.4 million referrals for allegations of abuse or neglect. A study found about 656,000 of these children to be victims of abuse or neglect (U.S. Department of Health and Human Services [HHS] 2021). Child maltreatment affects numerous individual and family outcomes related to health, employment, relationships, and self-sufficiency (Currie and Widom 2010; Danese et al. 2009; Jonson-Reid et al. 2012). The Child Abuse Prevention and Treatment Act (CAPTA) requires the examination of a wide range of topics related to the incidence of child maltreatment with the aim of informing efforts to better protect children from maltreatment and improve the well-being of victims of maltreatment.¹ Accurate and ongoing surveillance of the incidence of child maltreatment and related risk and protective factors can inform policy and programs as well as shape prevention and intervention efforts.

One promising approach to capturing information regarding child maltreatment is by linking local, state, or federal administrative records, such as those from child welfare, health, social services, education, public safety, and other agencies. This approach could improve the quality, usefulness, interoperability, and availability of child maltreatment data. Connected administrative data provide a growing opportunity to accurately capture the incidence of child maltreatment and related risk and protective factors. Administrative data typically are collected by public agencies and may include client-level service records, other documentation of program implementation, records of transactions or registrations, or similar information (Connelly et al. 2016).

The Administration for Children and Families (ACF) and the Office of Planning, Research, and Evaluation (OPRE) is proposing a new primary data collection about connected child maltreatment data in an effort to expand knowledge related to the capacity of administrative data to examine child maltreatment incidence and related risk and protective factors and address CAPTA research topics. The State Child Welfare Data Linkages Descriptive Study (SCW Descriptive Study) will gather systematic information on the extent to which states connect their child maltreatment data to other state and county data sets; how any connected data sets are created, managed, and used; and challenges states face in linking data. These data are not available from existing sources. The SCW Descriptive Study aims to provide important information to the field by documenting the capacity of state child welfare agencies to link data sets with other agencies. This study aims to present an internally valid description of the connected data capacity of participating state child welfare agencies, not to promote statistical generalization to different sites or service populations.

OPRE has contracted with Mathematica to conduct this study.

A2. Purpose

Purpose and Use

The SCW Descriptive Study will provide information of interest regarding how best to move forward in understanding the child maltreatment incidence and related risks and protective factors through connected administrative data. We define connected data as state child welfare administrative data that

¹ For a full list of topics, see CAPTA Sec. 104. Research and Assistance Activities and Demonstrations.

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are linked or integrated with administrative data from other state or county systems or agencies. The SCW Descriptive Study will provide ACF with information on the extent to which states connect their child maltreatment data to other data sets, whether by linking or integration; information on how any connected data sets are created, managed, and used; and challenges to linking data. This information may be used by ACF to support the ongoing and accurate surveillance of child maltreatment. It may be used by state agency staff to identify data linkage needs and promising practices to address those needs.

Information from the SCW Descriptive Study may be disseminated through briefs, reports, and other publicly available products. We will develop products that are useful to a variety of audiences, including child maltreatment researchers as well as state and federal agency staff. Data may be archived, as appropriate. Making the data available to other researchers may enable them to conduct additional, secondary data analyses of interest.

The information collected is meant to contribute to the body of knowledge on ACF programs. 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

The SCW Descriptive Study will explore the following research questions:

1. Which states link their child maltreatment data with other state administrative data sources?
2. Which states share their child maltreatment data? With whom do they share data?
3. How are state data linkages used for policy, practice, and/or research purposes?
4. What methods or approaches are used to link state data?
5. What policies, practices, or resources support connected state child maltreatment data?

Study Design

The proposed data collection is a descriptive study that will consist of three sequential data collection activities. First, a web-based survey of state child welfare directors (or their designees) will collect high-level information on the state’s connected data efforts (Instrument 1). Second, a web-based survey of staff who actively work on state or county connected data efforts will collect information on the specifics of various past, current, and future connected data efforts (Instrument 2). Finally, we will conduct a series of interviews with staff involved in state and county connected data efforts to contextualize information collected as part of the surveys (Instrument 3).

The survey data will be analyzed and tabulated at the state level. It will be presented as maps, tables, or figures, with responses as counts or percentages. Findings will be presented overall and for groups of states according to whether their child welfare services are administered by the state, its counties, or both (a hybrid model). States may be identified in the findings based on survey data. The interview data will provide context to key findings through themes, examples, and description. Any quotations from the interviews will not be attributed to specific states.

Table 1 provides an overview of the proposed instruments.

Table 1. Information collections

<i>Data Collection Activity/Instrument</i>	<i>Respondents</i>	<i>Guiding Questions and Purpose of Collection</i>	<i>Mode and Duration</i>
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Instrument 1: Initial Survey	State child welfare directors or their designee	<p>Guiding Questions: Which states share child maltreatment data, and with whom? Which states' child maltreatment data are linked to other data sets for policy, practice, and research purposes? How prepared are states to measure child maltreatment incidence using a data set that includes child maltreatment data and other data? Are the statuses of states' data sharing and linking related to their organizational structure and data systems?</p> <p>Purpose: This survey will gather broad information about the state's child maltreatment data systems and whether the state has connected data. This will set the foundation for future data collection activities, including identifying the best semi-structured interview respondents for that state.</p>	<p>Mode: Web</p> <p>Duration: 0.67 hours</p>
Instrument 2: Connected Data Survey	Staff in states with integrated data and/or data sharing agreement(s) with a connected data set	<p>Guiding Questions: What data are connected, by whom, and how? To what extent are the connected data used for policy, practice, or research? Does the state have data governance policies to support connected child maltreatment data? How prepared are states to measure child maltreatment incidence using a data set that includes child maltreatment data and other data? What are the content and coverage of connected data sets?</p> <p>Purpose: This survey will ask for more detailed information about specific connected data sets identified by the child welfare director. This will provide more nuanced and technical information about connected data than the child welfare agency director might be able to provide.</p>	<p>Mode: Web</p> <p>Duration: 0.58 hours</p>
Instrument 3: Interview guide	State child welfare directors, additional state staff, county staff in states with county-administered child welfare systems	<p>Guiding Questions: How will states' planned changes or updates to their child welfare case management system in the next five years affect their capacity to connect data? What were facilitators of and barriers to establishing data sharing agreements? How are connected data sets managed and stored? What are connected data used for (practice, research, state policy analysis, performance monitoring, etc.)? Are there challenges or barriers to using the connected data?</p> <p>Purpose: These interviews will capture additional detail regarding each state's experiences with connected data, such as facilitators of and barriers to connecting data. These interviews will provide details that will contextualize and complement information collected via the web-based surveys.</p>	<p>Mode: Semi-structured interviews (virtual)</p> <p>Duration: 1 hour</p>

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Other Data Sources and Uses of Information

Mathematica and ACF began designing the SCW Descriptive Study as part of the Child Maltreatment Incidence (CMI) Data Linkages project. The CMI Data Linkages project explored how innovative administrative data linkages can improve our understanding of child maltreatment incidence and related risk and protective factors. SCW Descriptive Study is a natural expansion to understand the extent to which state agencies may use connected administrative data to estimate the incidence of child maltreatment.

The study's analysis will include data collected by the study and publicly available information posted on ACF's Child Welfare Information Gateway. The information collected from the Child Welfare Information Gateway includes contact information on child welfare directors and whether child welfare services in each state are administered by the state, its counties, or partially by the state and its county(ies) (Child Welfare Information Gateway 2018).

A3. Use of Information Technology to Reduce Burden

The SCW Descriptive Study data collection plan is sensitive to issues of efficiency, accuracy, and respondent burden.

Web-based surveys can decrease respondent burden and improve data quality. Unlike paper instruments in which respondents must determine the question routes themselves, the web-based application will include built-in skips and route respondents to the next appropriate question based on their answers. The web-based program automatically skips them out of any questions that are not relevant to them, thus reducing the burden on respondents having to navigate through various paths. In addition, data checks can be programmed into the survey to eliminate responses that are out of range or that conflict.

Mathematica will conduct semi-structured interviews with select state child welfare directors and state and county staff. The information to be collected during these interviews is not conducive to the use of information technology, such as computerized interviewing. Virtual administration via a secure web platform such as WebEx offers the best opportunity to tailor the data collection to staff with minimal burden on respondents. These recordings, with participant approval, can assist in minimizing burden as verbatim transcripts will be made, decreasing the need for the interviewer to ask the respondent to repeat themselves to ensure the notes are accurate.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

The information collection requirements for the SCW Descriptive Study have been carefully reviewed to avoid duplication and to maximize opportunities to use existing data. Data collected for this study are not available anywhere else. To our knowledge, this is the first study that examines connected data in the context of child welfare agencies.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

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A6. Consequences of Less Frequent Collection

We designed this one-time data collection to ease the burden on respondents while maximizing response and information. The first two surveys (Instrument 1 and Instrument 2) are of different groups, while the final interview will capture nuanced information that will not be captured in the survey. The Initial Survey (Instrument 1) will collect critical foundational information, including whether the state uses connected data in its child maltreatment data systems, and the respondents for the Connected Data Survey and semi-structured interviews (Instrument 2 and 3). The Connected Data Survey will collect detailed, nuanced information about integrated data and specific linked data sets, which the state child welfare directors would not likely be able to provide. Finally, the semi-structured interviews with both state child welfare directors and additional state and county staff will contextualize each state's experiences with connected data, which would be difficult to capture in a closed-item, web-based survey. Without collecting information from multiple stakeholders involved in linking child maltreatment data, ACF risks missing information that would create a specific and nuanced view of how states structure data linkages and how connected data is used.

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 February 11, Volume 87, Number 29, pages 8017-8018, and provided a sixty-day period for public comment. During the notice and comment period, 1 comment was received, which is attached. In response to the comment, we have added information about pretesting and burden calculations to Supporting Statement B, section B3.

Consultation with Experts Outside of the Study

In addition to the Mathematica team, we solicited a panel of experts to review the instruments and provide written feedback. The experts included two staff who worked on the initial CMI Data Linkages projects, Jared Parrish (Senior Epidemiologist, Alaska Department of Health and Human Services, Alaska Birth Defects Registry/Fetal Alcohol Syndrome Surveillance Program) and Emily Putnam-Hornstein (John A. Tate Distinguished Professor for Children in Need and the Director of Policy Practice, School of Social Work, University of North Carolina at Chapel Hill; Co-Director, Children's Data Network); CMI Data Linkages project consultant Dr. Melissa Jonson-Reid (Ralph and Muriel Pumphrey Professor of Social Work Research, Brown School, Washington University in St. Louis); and ACF staff.

A9. Tokens of Appreciation

We do not plan to offer tokens of appreciation.

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A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

The study will collect names, email addresses, and telephone numbers of child welfare agency and partner staff and consultants for the purpose of contacting them to complete the relevant data collection activities. The study will not collect sensitive Personally Identifiable Information (PII).

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individual's personal identifier. Any files containing PII are stored on Mathematica's network in a secure project folder whose access is limited to select project team members. Only the principal investigator, project director, and key study staff have access to this folder. Furthermore, approved study team members can only access this folder after going through multiple layers of security. PII will not be kept in the same location as any data collected. Access to respondents' contact information is restricted to only those working on the SCW Descriptive 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, the Contractor will comply with all Federal and Departmental regulations for private information.

We will record interviews only with permission from participants. Before the discussions begin, we will inform participants that we want to record the discussion and ask them for their permission. The recording from the discussion will be deleted as soon as information has been transcribed. Virtual discussions will take place on a secure platform.

Before starting the interviews, we will inform all participants that their identities will be kept private to the extent permitted by law, that results will only be reported in the aggregate, and that they do not have to answer any questions that make them uncomfortable. We will also inform respondents that their states may be identified in public reports of study findings based on the collected data or in archived data. However, public reports and archived data will not identify respondents by name.

The SCW Descriptive Study will obtain a Certificate of Confidentiality. The study team has applied for this Certificate. The Certificate of Confidentiality helps to assure participants that their information will be kept private to the fullest extent permitted by law. The study team will also apply for IRB approval from the Health Media Lab IRB.

Data Security and Monitoring

As specified in the contract, the Contractor shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor has developed a Data Safety and Monitoring Plan that assesses all protections of respondents' PII. The Contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements.

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As specified in the contract, the Contractor shall use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or PII that ensures secure storage and limits on access.

A11. Sensitive Information²

The study does not include the collection of sensitive information. Although the study deals with child welfare and maltreatment, the instruments ask about data issues and do not include questions about incidents of abuse or other sensitive topics. The target participants are directors and staff at the state or county level within child welfare agencies, which are not a vulnerable group. This study does not collect Social Security numbers or any other personal sensitive information.

A12. Burden

Explanation of Burden Estimates

Table 2 presents the burden estimates for the new information collection. The estimates of time to complete each instrument are based on the project team's experience collecting data from state and county child welfare agency staff for the project's pretest (See Supporting Statement B, section B3 for additional information on pretesting).

- The initial survey is estimated to take 40 minutes (0.67 hours) to complete. We will invite 52 state and territory child welfare agency directors to complete the initial survey. The total burden over two years is estimated to be 35 hours (52 participants x 0.67), and the total annual burden is estimated to be 18 hours (35 hours/2 years).
- The connected data survey is estimated to take 35 minutes (0.58 hours) to complete. We will invite up to 208 state staff to complete the connected data survey. Each state (and territory) will receive up to four surveys, each focusing on one connected data set identified in the initial survey. In states where one person is identified in the initial survey as the contact for multiple

² 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 which 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 Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

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connected data sets, that person may receive up to four connected data surveys. Our estimates for burden hours define respondent by survey administration and not necessarily by the number of different people completing the survey. The total burden over three years is estimated to be 121 hours (208 participants x 0.58), and the total annual burden is estimated to be 61 hours (121 hours/2 years).

- The interview guide is estimated to take 60 minutes (one hour) to complete. We will invite up to 120 state and county staff to complete the interviews, virtually or by phone. The total burden over three years is estimated to be 120 hours (120 participants x 1), and the total annual burden is estimated to be 60 hours (120 hours/2 years).

Estimated Annualized Cost to Respondents

The total annual cost for data collection instruments is \$3,323.96. The hourly wage rate for staff is based on the mean hourly wage rate for social and community service managers (\$36.13) (SOC code 11-9151, National Occupational Employment and Wage Estimates, Bureau of Labor Statistics, Department of Labor, May 2020, http://www.bls.gov/oes/current/oes_stru.htm).

Table 2. Burden hours requested under this information collection

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Total Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Instrument 1: Initial Survey	52	1	0.67	35	18	\$36.13	\$650.34
Instrument 2: Connected Data Survey ¹	208	1	0.58	121	61	\$36.13	\$2,203.93
Instrument 3: Interview Guide	120	1	1	120	60	\$36.13	\$2,167.80
Total	-	-	-	-	139	-	\$5,022.07

¹Estimates for burden hours define respondent by survey administration and not by the number of different people completing the survey.

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost to the Federal government for the data collection activities under this ICR will be about \$477,000. Annualized costs to the Federal government will be about \$238,500 for the proposed data collection. These estimates of costs come from Mathematica’s budgeted estimates and include labor rates and direct costs.

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Table 3. Cost of proposed data collection

Activity	Detail	Estimated Cost
Survey administration	<ul style="list-style-type: none"> FTE time Operational expenses (such as equipment, overhead, printing, and staff support) Other expenses which would not have been incurred without this collection of information 	\$171,000
Analysis and initial dissemination	<ul style="list-style-type: none"> FTE time Operational expenses (such as equipment, overhead, printing, and staff support) Other expenses which would not have been incurred without this collection of information 	\$306,000
Total costs over the request period		\$477,000
Annual costs		\$238,500

A15. Reasons for changes in burden

This is a new information collection request.

A16. Timeline

The request for approval is for two years, which will cover the total period of the study. Data collection will begin after OMB approval and continue for 16 months. Preliminary analysis of data will begin 3 months after data collection begins. A series of three briefs, a technical report, and an infographic will be completed approximately six months after completing data collection.

Table 4 outlines the key time points for the study and for information collection, analysis, and reporting.

Table 4. Plan and Time Schedule for Information Collection, Tabulation, and Publication

Time after OMB approval	1-3 months	4-6 months	7-9 months	10-13 months	14-16 months	17-19 months	20-23 months	23-26 months
Data collection: Initial Survey	X							
Data collection: Connected Data Survey		X						
Data collection: Interview Guide				X	X			
Analysis		X	X	X	X	X	X	
Final Dissemination							X	
Archived Data								X

A17. Exceptions

No exceptions are necessary for this information collection.

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Attachments

Instruments

Instrument 1: Initial Survey

Instrument 2: Connected Data Survey

Instrument 3: Interview Guide

Appendices

Appendix A: Outreach to State Child Welfare Directors

Appendix B: Outreach to Respondents for the Connected Data Survey

Appendix C: Outreach to Child Welfare Directors, State Staff, and County Staff for Interviews

Appendix D: Public Comment on Federal Register Notice 2022-02928

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References

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