Judicial, Court, and Attorney Measures of Performance (JCAMP): Feedback and Implementation

OMB Information Collection Request

0970 - NEW

Supporting Statement Part A – Justification

September 2023

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**

Child welfare courts, including judges and attorneys, play a key role in ensuring the safety, permanency, and well-being of children in the child welfare system. However, few courts have the data or the ability to analyze and use data in a meaningful way to improve practice and outcomes for children and families. In 2021 - 2022, the Judicial, Court, and Attorney Measures of Performance (JCAMP) were developed (see OMB #: 0970-0593) and published. JCAMP is a set of national performance measures for child welfare courts to use to inform practice changes. To ensure the performance measures are implemented successfully, this project, JCAMP: Feedback and Implementation, is intended to support states, tribes, and local courts as they implement the JCAMP measures and to collect feedback from users to continuously improve implementation support strategies. The proposed data collection is necessary to sufficiently understand how to improve JCAMP implementation support and to provide data to inform state or tribal JCAMP projects when they lack the internal capacity to collect their own data.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency. The information collection is relevant to Sec. 5106, P.L 111-320, the Child Abuse Prevention and Treatment Act Reauthorization Act of 2010, and titles IV-B and IV-E of the Social Security Act. The Children’s Bureau has contracted with the American Bar Association Center on Children and the Law, James Bell Associates (JBA), Dr. Alicia Summers, and Dr. Sophia Gatowski to collection information about feedback on JCAMP implementation and performance measure data for states or tribes to inform their JCAMP projects.

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

This study will (1) collect information from JCAMP Implementation Teams to understand their experiences with JCAMP implementation support, and (2) collect information from parents and children with child welfare cases, foster/kinship caregivers, judges, caseworkers, parent attorneys, children’s attorneys, and child welfare agency attorneys to gather information for JCAMP measures selected for use by jurisdictions (jurisdictions will collect only the data elements relevant to them).

This information will inform refinement of the implementation materials and guidance and be used by JCAMP sites to inform their decision-making and practice changes. Eleven instruments will be used to achieve project goals (see Exhibit 1 below for more detail about each):

* JCAMP Feedback Survey
* Parent Experience Survey
* Parent Court Experience Question Bank
* Parent Focus Group Guide
* Youth Post-Hearing Short Survey
* Youth Experience Survey
* Youth Court Experience Question Bank
* Youth Focus Group Guide
* Caregiver Survey
* Stakeholder Survey
* Stakeholder Focus Group Guide

Information from the JCAMP Feedback Survey will be summarized in reports for the Children’s Bureau and disseminated publicly and in technical assistance (TA) products for court professionals. Information from the other JCAMP instruments will be cleaned and shared in a data file with sites where data was collected. It will also be summarized in site-specific reports for each site and may be included in reports prepared for the Children’s Bureau and disseminated publicly.

This information collection is intended to present internally valid description of (1) court professionals and parent/caregiver feedback on implementation support in a selection of implementation sites, and (2) performance measurement data among a selection of states, tribes, or courts. This data is not intended to promote statistical generalization to other sites or service populations. 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.

**Exhibit 1: Data Collection Activities**

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| --- | --- | --- |
| *Instruments* | *Respondent, Content, Purpose of Collection* | *Mode and Duration* |
| JCAMP Feedback Survey | **Respondents**: JCAMP implementation teams including Court Improvement Program (CIP) staff, judges, attorneys, Court Appointed Special Advocates, people with lived experience in child welfare, and other legal professionals (n= 100)**Content**: Questions about JCAMP implementation teams’ experiences with JCAMP written materials, technical assistance, and the eJCAMP online platform. **Purpose**: Inform ongoing improvements to implementation support strategies  | **Mode**: Web survey**Duration**: 0.25 hours |
| Parent Experience Survey | **Respondents**: Parents (n=250)**Content**: Questions about parents’ experiences in child welfare court cases, including, strategies used by judges to engage families, satisfaction with their legal representation, and parent demographic information. **Purpose**: To obtain feedback on parent experiences throughout the court process and develop strategies to improve equity. | **Mode**: Web survey or pen and paper**Duration**: 0.17 hours |
| Parent Court Experience Question Bank | **Respondents**: Parents (n=250)**Content**: Includes options for questions to ask parents with child welfare cases. Sites will be able to select questions that align with their chosen JCAMP measures. Surveys created by this bank will include up to 30 questions. **Purpose:** To provide a bank of questions/items for JCAMP teams as they develop Parent Experience Surveys that align with their chosen measures and outcomes.  | **Mode:** Web survey or pen and paper**Duration:** 0.17 hours  |
| Parent Focus Group Guide | **Respondents**: Parents (n=80)**Content**: Interview guide that includes questions for parents with child welfare cases about their experiences with the child welfare court process.**Purpose**: To further understand parent experiences throughout the child welfare court process. | **Mode:** Focus Group Interview**Duration:** 1 hour |
| Youth Post-Hearing Short Survey | **Respondents**: Youth (n=250)**Content**: Questions about youth experiences with child welfare court process including, judge engagement, legal representation, and demographic information. **Purpose**: To obtain feedback on youth experiences after the child welfare court hearing process and develop strategies to improve equity. | **Mode:** Web survey or pen and paper**Duration:** 0.08 hours |
| Youth Experience Survey | **Respondents**: Youth (n=250)**Content**: Collects information from youth involved in child welfare cases about their experiences with the child welfare court process. This survey also collects demographic data.**Purpose**: To obtain feedback from youth involved in child welfare court experiences with the court process and develop strategies to improve equity. | **Mode:** Web survey or pen and paper**Duration:** 0.17 hours |
| Youth Court Experience Question Bank | **Respondents**: Youth (n=250)**Content**: Includes options for questions to ask youth involved in child welfare cases. Sites will be able to select questions that align with their chosen JCAMP measures. Surveys created by this bank will include up to 30 questions.**Purpose**: To provide a bank of questions/items for JCAMP teams as they develop Youth Experience Surveys that align with their chosen measures and outcomes. | **Mode:** Web survey or pen and paper**Duration:** 0.17 hours |
| Youth Focus Group Guide  | **Respondents**: Youth (n=80)**Content**: Focus group guide that includes questions for youth involved in child welfare court. Questions ask about their experiences with the court process.**Purpose**: To understand the experiences of youth involved in child welfare courts.  | **Mode:** In-person or via video web meeting**Duration:** 1 hour |
| Caregiver Survey | **Respondents**: Caregivers (n=250)**Content:** Collects information from adults caring for children with child welfare cases about their experiences with the child welfare court process and demographic information. **Purpose**: To understand non-parent caregivers’ experiences with the child welfare court process and develop strategies to improve equity. | **Mode:** Web survey or pen and paper**Duration:** 0.08 hours |
| Stakeholder Survey | **Respondents**: Stakeholder (n=1500)**Content**: Collects data regarding judges’ and attorneys’ experiences in court including, persons present at hearings, judicial engagement strategies used with parents, children, and caregivers, the practices of parent, child, and agency attorneys during hearings, typical timelines to permanency, and case processing activities. **Purpose**: To obtain feedback from stakeholders (judges and attorneys) on experiences with the child welfare court process. | **Mode:** Web survey or pen and paper**Duration:** 0.17 hours |
| Stakeholder Focus Group Guide | **Respondents**: Stakeholder (n=400)**Content**: Focus group guide that asks judges, parent attorneys, children’s attorneys, and child welfare agency attorneys about their perceptions of the child welfare court system. Topics include family engagement, family due process, legal representation, decision-making for safety and permanency. **Purpose**: To gain insight on stakeholder perceptions of how families are engaged in the court process, how families receive due process, the quality of legal representation, safety and decision-making, and permanency decision-making.  | **Mode:** In-person or via video web meeting**Duration:** 1 hour |

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

The surveys in this information collection will be administered using Qualtrics, a web survey software. Respondents will be sent a link to access the survey and will have the option to complete the survey using their computers, tablets, or smart phones. The study team will test the survey link from each type of device to make sure that the survey displays properly and that responses are accurately recorded by the Qualtrics software. Focus groups may be conducted in-person or using a web-based video meeting using Zoom or Microsoft Teams software.

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

CIP self-assessments (OMB #: 0970-0307, expiration date: 11/30/2022) are completed annually by all 53 state CIPs and submitted to the Children’s Bureau and the Capacity Building Center for Courts (CBCC), the program’s TA provider.[[1]](#footnote-3) The self-assessments provide CB with some information about CIPs’ JCAMP projects (e.g., status and summary of findings). Review of the available information from CIP self-assessments has allowed us to limit the number of questions needed on the JCAMP Feedback Survey.

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

The proposed information collection does not impact small businesses or other small entities.

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

The proposed instruments would all be administered just once. The proposed approach has been developed to limit the information requested while still requesting enough information to provide useful data to ACF, and in turn states or tribes. If this information were not collected, the JCAMP project would lack the necessary information to provide effective implementation support and usable permanence measure data to states or tribes that lack the internal capacity to collect it themselves.

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

There are no special circumstances.

1. **Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency**

*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 June 28, 2023, Volume 88, Number 123, page 41962, and provided a sixty-day period for public comment. During the notice and comment period, we received no comments.

*Consultation with Experts Outside of the Study*

The JCAMP Core Team, consisting of experts and parents with lived experience, and youth and parents who experienced foster care, was consulted for survey development and informed data collection methods during the developmental phase of JCAMP. Instruments developed include the following: JCAMP Stakeholder, Parent, Caregiver, and Youth data collection survey and Parent/Caregiver Experience, Youth Experience, and Stakeholder focus groups.

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

No incentives for respondents are proposed for this information collection

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

*Personally Identifiable Information*

Although personally identifiable information (PII) will not be collected on the data collection instruments, PII will be used for survey administration and to schedule focus groups. The study team has information to reach out to potential respondents to the JCAMP Feedback Survey through previous work as TA providers to JCAMP implementation sites. For the other instruments in this information collection, respondent names and email addresses will be provided by local partners.

PII will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals’ personal identifier.

*Assurances of Privacy*

Information collected will be kept private. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private. Survey respondents will read an informed consent statement and must click “agree” to access the surveys (see page 1 of each survey). Focus group respondents will receive a consent statement ahead of time which will be read aloud before the focus group begins. They will be asked whether they agree to participate and whether the focus group can be recorded. If any participant does not want to be recorded, a study team member will take notes during the focus group instead. The study team will maintain participants’ privacy by not sharing respondents’ identities with anyone outside of the research team and ACF.

*Data Security and Monitoring*

JBA has a comprehensive set of policies and procedures in place to ensure data security and privacy protections and utilizes FedRAMP certified Microsoft Office 365 as the backbone of its information technology systems. In addition to Office 365, nearly every software utilized by JBA as part of day-to-day business has FedRAMP certification and an Authority to Operate (ATO) with the United States Department of Health and Human Services (HHS). This ensures that all project work is completed in a manner that is compliant with National Institute of Standards and Technology (NIST) 800-53 rev.4, the set of security standards that apply to most all of JBA’s work. In addition to utilizing appropriate software suites to meet strict security requirements in our projects, JBA maintains a set of security policies and procedures that ensure that JBA’s user responsibility is maintained. Data collection will happen using Qualtrics. JBA has an enterprise license for the version of Qualtrics which has FedRAMP certification and an HHS ATO.

1. **Justification for Sensitive Questions**

The proposed information collection does not include sensitive information.

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

*Explanation of Burden Estimates*

* The JCAMP Feedback Survey will be administered one time and will take an average of about 15 minutes to complete. (100 respondents)
* The Parent Experience Survey will be administered one time and will take 10 minutes to complete. (250 respondents)
* The Parent Court Experience Question Bank will be administered one time and will take 10 minutes to complete. (250 respondents)
* The Parent Focus Group Guide will be administered one time and will take one hour to complete. (80 respondents)
* The Youth Post-Hearing Short Survey will be administered one time and will take 5 minutes to complete. (250 respondents)
* The Youth Experience Survey will be administered one time and will take10 minutes to complete. (250 respondents)
* The Youth Court Experience Question Bank will be administered one time and will take 10 minutes to complete. (250 respondents)
* The Youth Focus Group Guide will be administered one time and will take one hour to complete. (80 respondents)
* The Caregiver Survey will be administered one time and will take 5 minutes to complete. (250 respondents)
* The Stakeholder Survey will be administered one time and will take 10 minutes to complete. (1,500 respondents)
* The Stakeholder Focus Group Guide will be administered one time and will take one hour to complete. (400 respondents)

*Estimated Annualized Cost to Respondents*

**Lawyers, Judges, and Related Workers:** The cost to stakeholder respondents was calculated using the Bureau of Labor Statistics (BLS) job code for lawyers, judges, and related workers [23-1000] and wage data from May 2022, which is $76.78 per hour. To account for fringe benefits and overhead, the rate was multiplied by two which is $153.56.

<https://www.bls.gov/oes/current/oes_nat.htm#23-0000>

**Parents and Caregivers:** The cost to parent and caregiver respondents was calculated using the Bureau of Labor Statistics (BLS) job code for overall occupations, [00-0000] and wage data from May 2022, which is $29.76 per hour. To account for fringe benefits and overhead, the rate was multiplied by two which is $59.52.

<https://www.bls.gov/oes/current/oes_nat.htm#00-0000>

**Youth:**

The cost to youth was calculated using the Government of the District of Colombia Department of Employment Services Living Wage Act, which is $17.00 per hour. To account for fringe benefits and overhead, the rate was multiplied by two which is $34.00 per hour.

[https://does.dc.gov/sites/default/files/dc/sites/does/publication/attachments/2023 Living Wage Fact Sheet.pdf](https://does.dc.gov/sites/default/files/dc/sites/does/publication/attachments/2023%20Living%20Wage%20Fact%20Sheet.pdf)

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| --- | --- | --- | --- | --- | --- | --- |
| Instrument  | No. of Respondents  | No. of Responses per Respondent  | Avg. Burden per Response (in hours) | Annual Burden (in hours) | Average Hourly Wage | Total Annual Respondent Cost |
| JCAMP Feedback Survey | 100 | 1 | 0.25 | 25 | $153.56 | $3,839.00 |
| Parent Experience Survey | 250 | 1 | 0.17 | 42.5 | $59.52 | $2,529.60 |
| Parent Experience Survey Question Bank | 250 | 1 | 0.17 | 42.5 | $59.52 | $2,529.60 |
| Parent Experience Focus Guide  | 80 | 1 | 1 | 80 | $59.52 | $4,761.60 |
| Youth Post-Hearing Survey | 250 | 1 | 0.08 | 20 | $34.00 | $680.00 |
| Youth Experience Survey | 250 | 1 | 0.17 | 42.5 | $34.00 | $1,445.00 |
| Youth Experience Question Bank | 250 | 1 | 0.17 | 42.5 | $34.00 | $1,445.00 |
| Youth Experience Focus Group Guide  | 80 | 1 | 1 | 80 | $34.00 | $2,720.00 |
| Caregiver Experience Survey | 250 | 1 | 0.08 | 20 | $59.52 | $1,190.40 |
| Stakeholder Survey  | 1500 | 1 | 0.17 | 255 | $153.56 | $39,157.80 |
| Stakeholder Focus Group Guide | 400 | 1 | 1 | 400 | $153.56 | $61,424.00 |
|  |  | **Estimated Annual Burden Total:**  | 1,050 | **Estimated Annual Cost Total:**  | $121,722.00 |

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

There are no additional costs to respondents.

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

The research contractor’s annual costs to conduct this activity are estimated at $85,000. Research contractor costs consist of labor hours, with the number of hours for each staff member multiplied by hourly rates. There will be no costs beyond regular labor costs for staff. This work will be conducted under a current funding stream.

|  |  |
| --- | --- |
| **Cost Category** | **Estimated Costs** |
| Data Collection  | $30,00 |
| Data Analysis | $25,000 |
| Reporting | $30,000 |
| **Total costs over the one-year request period** | $85,000 |

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

This is a new information collection.

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

Data from the JCAMP Feedback Survey will be published in an annual report to the Children’s Bureau and may be shared during presentations and webinars with the public. Information may also be incorporated into technical assistance materials produced by the JCAMP team. There is no plan to make the raw, unanalyzed data collected available on the agency’s website or data.gov or in a restricted-access environment. As data collection ends for individual states and tribes, raw data from the instruments used will be compiled, cleaned, and shared with the state or tribe where the data was collected. A summary report of data for each performance measures the state or tribe selected will also be shared with the state or tribe and the Children’s Bureau. Summary data may also be disseminated in public reports.

We plan to administer all data collection materials following OMB approval. We anticipate it will take approximately six months to complete the data collection. Data analysis is then expected to begin after data collection is complete. Findings will then be used to inform implementation guidance and state or tribe specific practice. See Supporting Statement B for more information on plans for data collection and analysis.

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

Does not apply.

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

No exceptions are necessary for this information collection.

Attachments

Instrument 1\_JCAMP Feedback Survey

Instrument 2\_Parent Experience Survey

Instrument 3\_Parent Court Experience Survey Question Bank

Instrument 4\_Parent Experience Focus Group Guide

Instrument 5\_Youth Post-Hearing Short Survey

Instrument 6\_Youth Experience Survey

Instrument 7\_Youth Court Experience Question Bank

Instrument 8\_Youth Focus Group Guide

Instrument 9\_Caregiver Experience Survey

Instrument 10\_Stakeholder Survey

Instrument 11\_Stakeholder Focus Group Guide

Appendix A\_JCAMP Feedback Survey Invite

Appendix B\_JCAMP Feedback Survey Non-Responder Email

Appendix C\_JCAMP Feedback Survey Non-Responder Phone Script

Appendix D\_Parent Experience Survey Email Invite

Appendix E\_Parent Experience Survey Non-Responder Email

Appendix F\_Parent Experience Survey Non-Responder Phone Script

Appendix G\_Parent Focus Group Guide Email Invite

Appendix H\_Parent Focus Group Non-Responder Email

Appendix I\_Parent Focus Group Non-Responder Phone Script

Appendix J\_Youth Survey Email Invite

Appendix K\_Youth Survey Non-Responder Email

Appendix L\_Youth Survey Non-Responder Phone Script

Appendix M\_Youth Focus Group Email Invite

Appendix N\_Youth Focus Group Non-Responder Email

Appendix O\_Youth Focus Group Non-Responder Phone Script

Appendix P\_Caregiver Survey Email Invite

Appendix Q\_Caregiver Survey Non-Responder Email Script

Appendix R\_Caregiver Survey Non-Responder Phone Script

Appendix S\_Stakeholder Survey Email Invite

Appendix T\_Stakeholder Survey Non-Responder Email

Appendix U\_Stakeholder Survey Non-Responder Phone Script

Appendix V\_Stakeholder Focus Group Email Invite

Appendix W\_Stakeholder Focus Group Non-Responder Email

Appendix X Stakeholder Focus Group Non-Responder Phone Script

1. The Children’s Bureau funds the [CBCC](https://capacity.childwelfare.gov/courts) to provide capacity-building services to CIPs to improve child welfare legal and judicial practice. [↑](#footnote-ref-3)