

Prevention Services Data Collection

**OMB Information Collection Request
0970 - 0529**

Supporting Statement Part A - Justification

March 2025

Type of Request: Revision

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 48 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 five 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, 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

CB has reviewed the updated Statistical Policy Directive No. 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15; 89 FR 22182) and has been assessing its implications for this data collection as well as other related data collections, such as AFCARS and NCANDS. CB is developing an Action Plan to comply with the revised SPD-15 requirements by the March 2029 deadline. The plan will require a staged and coordinated effort across these and other relevant data collections to properly sequence the changes that will be required of respondents to reprogram and restructure underlying information management systems so that they can both collect and report out race and ethnicity data consistent with revised requirements. Because jurisdictions will have to

substantially alter how they collect and report data, and the parallel “receiving” systems must also be altered to accommodate a changed data collection, the effort will place significant burden on respondents. CB’s plan will include a thorough assessment of the implications of updating the elements and will suggest how to best coordinate required changes across data collections in order to meet the March 2029 deadline. Given the significance of these particular circumstances, and CB’s interest in providing states careful guidance in the transition to revised race and ethnicity categories, no changes are proposed at this time.

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 December 27, 2024, Volume 89, Page 105608-105609, and provided a sixty-day period for public comment. During the notice and comment period, we received zero comments from states and advocacy agencies.

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. ACF will keep information private to the extent permitted by law.

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

Estimated Burden Hours and Cost to Respondents

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Reimbursable Percent	Total Annual Cost
Prevention Services Data	53	2	5	530	\$63.15	50%	\$16,734.75

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 agencies from the first period of information collection. If needed, we will submit a related change request to update our estimates. Also note that the majority of time spent related to this collection will actually be around #1) data system redesign, #2) writing and executing code necessary to create an XML data file for submission and #3) interfacing with CB to submit the data file. This data collection effort includes 14 variables, many of which are already maintained in the agency's data system through other data collection efforts. Due to this, we have moved the time and related costs for system redesign and information technology work to A13. Based on approved and submitted agency prevention plans, we expect that 53 states, tribes, or territories will opt into 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, tribes and territories have opted into the program and have begun to submit data to ACF.

The job codes for respondents are Administrative Support Occupations (43-000) with an average hourly wage of \$23.05, Social and Community Service Managers (11-9151) with an average hourly wage of \$40.10. We reviewed 2023 Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm). ACF averaged these wages to come to an average labor rate of \$31.58. To ensure we took into account overhead costs associated with these labor rates, ACF doubled this rate (\$63.15). Therefore, the cost to respondents is estimated to be \$33,469.50 (530 hours X \$63.15). Participating states and tribes are able to claim reimbursement for 50 percent of administrative costs associated with this program, and therefore the total annual cost to participating states and tribes would be \$16,734.75 (\$33,469.50 / 2).

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 and allowable at 50 percent 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.

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Reimbursable Percent	Total Annual Cost
Prevention Services Data	53	2	26	2,756	\$120.91	50%	\$166,613.98

The job codes are Computer Information and Systems Managers (11-3021) with an average hourly wage of \$86.88, Computer and Mathematical Occupations (15-0000) with an average hourly wage of \$54.39, Social and Community Service Managers (11-9151) with an average hourly wage of \$40.10. We reviewed 2023 Bureau of Labor Statistics data (https://www.bls.gov/oes/current/oes_nat.htm). ACF averaged these wages to come to an average labor rate of \$60.46. To ensure we took into account overhead costs associated with these labor costs, ACF doubled this rate (\$120.91). Therefore, the costs of other burden is estimated to be \$333,227.96 (2756 hours x \$120.91). States and tribes participating in the data collection effort are eligible to receive 50 percent reimbursement for administrative costs associated with this effort, therefore the total annual cost to the state and tribes is \$166,613.98 (\$333,227.96 / 2).

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	\$142.60	\$103,812.80
Operation and analysis of Prevention Services Database	Contractor Staff	1 Staff; 12 hours a week	\$178.85	\$111,602.40
Federal IV-E Administrative Respondent Cost Reimbursement	-	50% reimbursement of administrative costs	-	\$16,734.75
Federal IV-E Other Administrative Cost Reimbursement	-	50% reimbursement of administrative costs	-	\$166,613.98
Estimated Totals		26 hours		\$398,763.93

The average annual federal costs associated with operation of the database is based on calculations of federal staff, contractor staff labor, and federal reimbursement to participating states and tribes. For federal staff, a total of 14 hours a week will be allocated at an average cost per hour of \$71.30. For contractor staff, a total of 12 hours at \$89.42 an hour. In order to take ensure we took into account overhead associated with these labor costs, ACF doubled the estimated hourly rate (\$142.60 and \$178.85). Therefore, the average annual cost to the federal government for federal staff and contract labor is expected to be \$215,415.20.

Federal IV-E administrative cost for respondent reimbursement is calculated at 50 percent reimbursement of total respondent costs accrued by the participating state and tribes at \$16,734.75 (\$33,469.50 / 2). Federal IV-E administrative reimbursement for other costs is calculated as 50 percent reimbursement of total other costs accrued by the participating state and tribe as \$166,613.98 (\$333,227.96 / 2). Total annualized costs to the federal government are estimated at \$381,478.13.

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. There are no changes to the information collection since the last OMB approval. The number of respondents has been updated to reflect current estimates and the hours per response have been reframed, as described in A12 and A13.

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 are necessary for this information collection.