

# **Child Welfare Study to Enhance Equity with Data (CW-SEED)**

## **Formative Data Collections for ACF Research**

**0970 – 0356**

## **Supporting Statement**

### **Part A**

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**Alternative Supporting Statement for Information Collections Designed for  
Research, Public Health Surveillance, and Program Evaluation Purposes**

## **Part A**

### **Executive Summary**

- **Type of Request:** This request is for a generic information collection under the umbrella generic, Formative Data Collections for ACF Research (0970-0356).
- **Progress to Date:** The project received approval to conduct case studies in up to six sites (OMB control number 0970-0607) as part of The Child Welfare Study to Enhance Equity with Data (CW-SEED). As the study team prepares for data collection, they have identified a need more information to inform the selection of sites for this project.
- **Description of Request:** This is a formative data collection request to conduct informational calls with child welfare agencies and their partners in up to 20 sites implementing potentially promising data practices to advance equity in service delivery and child and family outcomes. This information collection will inform the selection of up to 6 sites for participation in future case studies. We do not intend for this information to be used as the principal basis for public policy decisions.
- **Time Sensitivity:** The information collected during this data collection will be used to inform the selection of case study sites in a currently active project. To stay on track with our project timeline, our goal is to complete this data collection before the end of December 2023.

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### A1. Necessity for Collection

To address disparities and to advance equity<sup>1</sup>, the White House released an [Executive Order](#) calling for each agency across the federal government to assess whether and to what extent its policies and programs perpetuate systematic barriers to opportunities and benefits for underserved populations. Children and families from underserved populations are overrepresented in many of the Administration for Children and Families' (ACF) programs, including the Children's Bureau. Research has highlighted the persistent, disproportionate involvement of children from African-American and American Indian and Alaska Native families, children with disabilities, and youth identifying as LGBTQ+ in the child welfare system. Beyond being more likely to enter into the system, some research indicates disparities in these children's long-term outcomes, such as higher likelihood of removal from the home and unstable placements (Child Welfare Information Gateway, 2016). Assessing equity in child welfare is methodologically difficult given that children and families from underserved populations may be overrepresented in the child welfare system due to actual need for these services, perhaps reflecting inequities experienced up-stream.

There is limited information on current and promising practices across the data lifecycle related to data planning, collection, access, analysis, use of statistical tools and algorithms, reporting, and dissemination in the child welfare space. The Child Welfare Study to Enhance Equity with Data (CW-SEED), will be a first step towards understanding one mechanism, data practices, by which child welfare agencies and their partners might reduce disparities among populations served. The project team has used publicly available information to identify potential sites, and has recognized a need to request specific standard information from potential sites to identify those that have potentially promising practices that can be recruited for the CW-SEED case studies (see OMB#: 0970-0607). This formative data collection is necessary to ensure data collected for the larger CW-SEED project is relevant and useful to ACF and the broader field.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency. ACF has contracted with Mathematica and its partners to carry out this information collection.

### A2. Purpose

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<sup>1</sup> The term "equity" means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as Black, Latino, Indigenous and Native American, Asian, Pacific Islander, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer (LGBTQ+) persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

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### *Purpose and Use*

The purpose of this formative information collection is to gather preliminary information about practices across the data life cycle related to data planning, collection, access, and analysis; use of statistical tools and algorithms; and data reporting and dissemination (hereafter referred to as data practices) in up to 20 sites. The study team will conduct these informational calls for internal planning purposes; these findings will not be publicly released. ACF will use the findings from this formative information collection to select up to 6 sites for participation in case studies for CW-SEED (see OMB #: 0970-0607 for more information about the case studies).

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for research and evaluation (0970-0356):

- inform the development of ACF research

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.

### *Guiding Questions*

This information collection is guided by the following questions that will inform the site selection for future case study participation:

1. What data practice(s) is the site currently using to promote equity?
2. Which population(s) does the data practice address?
3. How, if at all, is the community engaged in the data practice(s)?
4. What lessons might other child welfare agencies learn from this site's efforts to address equity with data?

### *Study Design*

This generic information collection (GenIC) request entails one, 60-minute informational call with staff from up to 20 sites to explore potentially promising data practices used by the sites to promote equity. Sites have been purposefully selected, as described in Supporting Statement B. Within sites, we will engage up to three staff members to learn more about their practices.

The limited number of sites will not represent all child welfare agencies across the United States. Rather, the sites serve as a purposive sample of agencies implementing data practices to advance equity. As a result, information we collect about the data practices cannot be generalized to the broader population of child welfare agencies.

To address the guiding questions, we will collect data using a topical guide. Table 1 provides an overview of the proposed instrument.

**Table 1. Data collection activity, purpose, and mode**

<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Informational call topic guide	<b>Respondents:</b> Child welfare agency leaders and staff; partner agency leaders	<b>Mode:</b> One (1) virtual interview

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	<p><b>Content:</b></p> <ul style="list-style-type: none"> <li>• Broad description of the data practice(s) of interest</li> <li>• Length of time the site has been implementing the data practice(s)</li> <li>• How the community is engaged</li> <li>• Challenges encountered in implementing the data practice(s)</li> </ul> <p><b>Purpose:</b> To explore the data practice(s) the site is implementing for consideration as a case study site.</p>	<p><b>Duration:</b> 60 minutes</p>
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*Other Data Sources and Uses of Information*

The study team initially identified a list of potential sites based on publicly available information and input from experts (see A9). The study team will review publicly available documentation relevant to each of the sites, such as that from published literature or publicly available sources online. This information will be used in conjunction with the data collected during the informational calls to inform the selection of appropriate sites to recruit for CW-SEED case studies.

**A3. Use of Information Technology to Reduce Burden**

The data collection plan is designed to efficiently obtain information and minimize respondent burden. When feasible, we will gather information from existing data sources. The information to be collected during these semi-structured interviews is not conducive to the use of information technology such as computerized interviewing.

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

We have used publicly available information to identify sites and will use publicly available information to complement the information collected during the interviews. However, data collected for this project are not available anywhere else. To our knowledge, this is the first study examining the implementation of data practices to advance equity in child welfare service delivery and outcomes.

**A5. Impact on Small Businesses**

No small businesses will be involved with this information collection.

**A6. Consequences of Less Frequent Collection**

This is a one-time data collection.

**A7. Now subsumed under 2(b) above and 10 (below)**

**A8. Consultation**

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### *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 two notices in the Federal Register announcing the agency's intention to request an OMB review of the overarching generic clearance for formative information collection. This first notice was published on November 3, 2020, Volume 85, Number 213, page 69627, and provided a sixty-day period for public comment. The second notice published on January 11, 2021, Volume 86, Number 6, page 1978, and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

### *Consultation with Experts Outside of the Study*

The CW-SEED study team consulted with a group of fewer than 10 experts that represent child welfare agency leaders, data staff, community organizations, researchers, and advocates to identify potential sites for these informational calls. Experts provided a peer review of the potential sites the project teams identified based on publicly available information. Throughout the information collection, we will continue to work with expert consultants.

### **A9. Tokens of Appreciation**

We are not proposing monetary, in-kind, or material tokens of appreciation for participants in this collection.

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

#### *Personally Identifiable Information*

This effort does not include collecting sensitive Personally Identifiable Information (PII). For the purposes of contacting child welfare agency staff and their partners, we will use names, email address, and telephone numbers that are publicly available for these staff. We will not be collecting PII.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier. Any files containing PII are stored on Mathematica's network in a secure project folder whose access is limited to select study team members. Only the 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 CW-SEED project.

#### *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.

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### *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.

The study team will use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all information during storage and transmission. They will securely generate and manage encryption keys to prevent unauthorized decryption of information in accordance with the Federal Processing Standard. They will ensure that it incorporates this standard into its property management or control system and establishes 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, including audio recordings of discussions with key program and partner staff and participants, will be secured in accordance with the most current National Institute of Standards and Technology requirements and other applicable Federal and Departmental regulations. In addition, the study team will submit a plan for the protection of any paper records, field notes, or other documents that contain PII that ensures secure storage and limits on access.

### **A11. Sensitive Information<sup>2</sup>**

We are not collecting sensitive information.

### **A12. Burden**

#### *Explanation of Burden Estimates*

Table 2 presents the burden estimates for this formative information collection. The estimates of time to complete the instrument are based on the CW-SEED study team's experience collecting qualitative data from child welfare agency staff and from social service providers for other ACF studies such as Fathers and Continuous Learning in Child Welfare (OMB Control No. 0970-0579) and Parents and Children Together Evaluation (OMB Control No. 0970-0403).

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<sup>2</sup> 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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We are assuming the number of staff who are interviewed at each site will be five on average, for a total of 100 participants across up to 20 sites. The informational call topic guide is estimated to take 60 minutes (1 hour) to complete. This may be less by site based on the data practice(s) of interest.

### *Estimated Annualized Cost to Respondents*

The total annual cost for data collection instruments is \$3,813.00. The hourly wage rate for staff (Instrument 1) is based on the mean hourly wage rate for social and community service managers (\$38.13) (SOC code 11-9151, National Occupational Employment and Wage Estimates, Bureau of Labor Statistics, Department of Labor, May 2022, [Social and Community Service Managers \(bls.gov\)](https://www.bls.gov/social-and-community-service-managers)).

**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/Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Instrument 1: Informational call topic guide	100	1	1	100	\$38.13	\$3813.00

### **A13. Costs**

There are no additional costs to respondents.

### **A14. Estimated Annualized Costs to the Federal Government**

Annualized costs to the Federal government will be about \$119,890 for the proposed data collection. These estimates of costs come from Mathematica's budgeted estimates and include labor rates and direct costs.

Cost Category	Estimated Costs
Data collection and preparation of notes and final memo	\$119,890
<b>Total/Annual costs over the request period</b>	<b>\$119,890</b>

### **A15. Reasons for changes in burden**



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This is for an individual information collection under the umbrella formative generic clearance for ACF research (0970-0356). Number of respondents have been updated to reflect the experiences in the field and needs for number of interview.

**A16. Timeline**

We will begin reaching out to schedule informational calls upon OMB approval. We expect to complete the calls by December 2023.

**A17. Exceptions**

No exceptions are necessary for this information collection.

**Attachments**

*Instrument*

Instrument 1: informational call topic guide

*Appendix*

Appendix A: Outreach email template