Runaway and Homeless Youth Homeless Management Information System (RHY-HMIS)

OMB Information Collection Request

0970 - 0573

Supporting Statement Part A - Justification

March 2024; August 2025

Type of Request: Revision

Submitted By:
Family and Youth Services Bureau
Administration for Children and Families
U.S. Department of Health and Human Services

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

   The Runaway and Homeless Youth (RHY) program serves as the national leader for the provision of shelter and supportive services to youth experiencing homelessness. The RHY program administers grants to public and private organizations to establish and operate youth emergency shelters and transitional living programs. These grant recipients are located in all 50 states, the District of Columbia, and the U.S. territories. The three program types are as follows:

   1. The **Basic Center Program (BCP)** funds grants to community-based, public and private agencies for the provision of outreach, crisis intervention, temporary, emergency shelter, counseling, family reunification, and aftercare services to runaway and homeless youth under age 18 years and their families. BCPs can provide up to 21 days of shelter for up to 20 youth at each facility, with an exception in those jurisdictions that require a higher limit in order to be licensed. Funds available for the BCPs are allotted among the states using a formula based on the population of youth under age 18 years as a proportion of the national population.

   2. The **Transitional Living Program (TLP)** and **Maternity Group Homes (MGH)** provide grants to public and private organizations to support long-term, residential shelter, and comprehensive supportive services to homeless youth ages 16 to under 22 years who cannot safely live with their own families. The program provides a long-term, safe, stable, and nurturing environment for eighteen (18) months, and under extenuating circumstances, can be extended to twenty-one (21) months. Services include individual and group counseling, education in basic life skills, interpersonal skill building, assistance with educational advancement, and job attainment skills, and access to physical and mental health care. These services are designed to help youth that are homeless develop the skills necessary to make a successful transition to self-sufficient living. The TLPs also fund maternity group homes, which are specifically designed to meet the needs of pregnant and/or parenting youth. These homes provide the services described above in addition to parenting support.

      o The **MGH** program supports homeless pregnant and/or parenting young people, as well as their dependent children. MGHs are TLPs specifically designed to meet the needs of pregnant and/or parenting youth. These homes provide the services described above for TLP in addition to parenting skills, childcare, child development, education, and health and nutrition services. Youth must be between the ages of 16 and 22 years to enter the program. In addition to standard TLP services, MGH programs offer an array of comprehensive services including parenting skills, child development, family budgeting, health, and nutrition skills.

   3. The **Street Outreach Program (SOP)** provides funding for grants to public and private organizations for street-based outreach and education, and referrals for shelter and services for runaway, homeless and street youth who have been subjected to or

are at risk of being subjected to sexual abuse, exploitation, and human trafficking. SOPs provide support services that aim to move youth into shelter or stable housing and help prepare them for independence. Youth receive provisions for their basic needs, including food, clothing, hygiene or first aid packages, information about services and safe places, and encouragement to access these resources.

The Runaway and Homeless Youth Act (RHYA), as reauthorized by the Reconnecting Homeless Youth Act of 2008 (P.L.110-378) through FY 2013 and more recently reauthorized by the Juvenile Justice Reform Act through FY 2019, mandates that Runaway and Homeless Youth programs provide statistical records profiling the youth and family members whom it serves and also mandates that the Department of Health and Human Services (HHS) report regularly to Congress on the status of RHY-funded programs serving runaway and homeless youth. Further, these requirements include maintenance of client statistical records and submission of annual program reports regarding the characteristics of the youth and families served and the services provided to them. The October 2008 reauthorization of the Act and the reauthorization through FY 2019, maintained the longstanding requirements, as described in the legislation.

This information collection request is for the Family and Youth Services Bureau (FYSB) to continue to collect the data standards to meet these legislative requirements. All RHY funded organizations are required to collect and submit their statistical information/data through a larger system of data standards housed by the Department of Housing and Urban Development's (HUD) Homeless Management Information System (HMIS). FYSB's data standards within that system are referred to as the Runaway and Homeless Youth Homeless Management Information System (RHY-HMIS). RHY grant recipients are required to enter their RHY-HMIS data through their local HUD's Continuums of Care (CoC) HMIS. Quarterly to meet the legislative requirements, RHY grant recipients work with their HMIS Leads to extract their data for uploading to FYSB. See sections A3 and A4 for more information about the partnership with HUD and its HMIS.

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

The purpose of this RHY data collection is to meet the legislative requirement as specified in the RHYA under Parts A and B "to keep adequate statistical records profiling homeless youth which it serves and not to disclose the identity of individual homeless youth in reports or other documents based on such statistical records." The RHY data collected are used for the following purposes:

- Provide data to Congress via the bi-annual Report to Congress;
- Inform the design of future program changes;
- Inform the RHY performance measures;
- Provide respective data to each RHY grant recipient; and

- Provide data to the Federal Project Officers to assist grant recipients with technical assistance, as needed.

The data collected includes demographics of youth, services received, any systems involvement, school status, employment status, safe and appropriate exit, and human trafficking involvement, to name a few (see Attachment A-RHY Program Specific Elements).

All RHY grant recipients must submit RHY data collected in RHY-HMIS to FYSB during a quarterly upload process by generating a report in the local HMIS with de-identified name, date of birth, and Social Security numbers of all youth served with FYSB funding. The RHY youth-level data are submitted by each grant recipient through a repository to FYSB. If the data are not hashed to de-identify personally identifiable information, the RHY grant recipient receives an error notification and RHY grant recipients must assign at least one point of contact for uploading the youth-level data to FYSB.

Consent from youth to collect data and enter in RHY-HMIS is not needed, but consent is required for RHY data to be shared across providers that are part of HUD's CoC. The parent or legal guardian of youth under 18 must provide the consent to share data, whereas youth 18 years or older are able to provide consent by themselves to share their data.

3. Use of Improved Information Technology and Burden Reduction

FYSB integrated the RHY data standards data collection efforts with the HUD' HMIS, creating the RHY-HMIS. Effective April 2015, all RHY grant recipients were required to enter their RHY data into RHY-HMIS though their local HUD's CoC HMIS. In addition to the technical assistance provided by the RHY-HMIS contractor, additional trainings are provided by CoCs' HMIS administrators, RHYTTAC, RHY Federal Project Officers, and grantees will also have access to online tutorials that provide instructional support for RHY-HMIS data collection through HMIS. RHY grant recipients must receive access to their local HMIS by a HMIS Lead at the CoC where the RHY grant recipient provides services and receive training on the use and reporting functionalities of HMIS. RHY grant recipients must report to the HMIS lead any technical or structural issues on the use of HMIS.

The RHY Act has a legislative requirement to collect data from all RHY funded programs. RHY data are extracted from the local HMIS system and hashed to de-identify PII and then uploaded to a repository for submission to FYSB.

4. Efforts to Identify Duplication and Use of Similar Information

In April 2015, ACF/FYSB joined with HUD and other federal partners that serve homeless populations to move toward a shared language, shared data elements, and improved data

collection instruments. This partnership culminated in the integration of the RHY-HMIS data reporting system, which captures all RHY data through HUD's HMIS.

There are no other sources of information available to be reported to FYSB on runaway and homeless youth and therefore, the RHY-HMIS data collection effort does not duplicate any existing data collected on this population of youth. In fact, RHY-HMIS is the only uniform collection process that can be reported to FYSB regarding the number, composition, and characteristics of runaway and homeless youth served by the RHY programs, as mandated by the RHY Act.

To ensure minimal duplication of data collected, the HUD data standards, called Universal Data Elements (UDEs), are required to be collected by all federal partners that are part of HUD's HMIS. The UDEs are only required to be entered once for each youth no matter how many times they received service as a method to minimize the duplication of number of youth entered in the HMIS.

5. Impact on Small Businesses or Other Small Entities

Public (state and local) and private nonprofit entities (including faith-based and community-based organizations) and coordinated networks of such entities, are eligible to apply for RHY funds unless they are part of the juvenile justice system. These include both small and large businesses or entities. As part of their RHY grant requirements, grant recipients are required to collect and submit data on all youth served by their projects. The information collected is limited to that necessary to fulfill the reporting requirements and grant recipients submit information electronically.

For profit organizations are not eligible and private institutions of higher education must be non-profit entities.

6. Consequences of Collecting the Information Less Frequently

If the data are not collected and reported, FYSB cannot meet the legislative requirement of the RHY Act or the requirement to report these data to Congress. The RHY Act requirements include maintenance of client statistical records and submission of annual program reports regarding the characteristics of the youth and families served and the services provided to them. Further, FYSB cannot fulfill its obligation to effectively serve the runaway and homeless youth population in the United States, nor report meaningful and reliable information to Congress about the extent of this issue or the effectiveness of various methodologies designed to provide assistance to this population, without access to timely and accurate information.

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

There are no special circumstances regarding the collection of these RHY data. No individually-identifying information is submitted and all reports provide the data in aggregate. Youth are tracked using anonymized, system-generated IDs.

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 January 18, 2024, Volume 89, Number 12, page 3408, and provided a sixty-day period for public comment. We did not receive comments.

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

There is no remuneration, of any kind, to RHY-HMIS users. Participation in data collection is legislatively required for all RHY grant recipients.

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

RHY-HMIS currently maintains ACF's required built-in, structured security mechanisms that assure the confidentiality of the clients. These mechanisms include:

- Unique Identifiers - The HMIS data collection system assigns unique agency identification numbers to BCP, TLP, MGH, and SOP grant recipients. The youth identification number is generated by the automated system according to a secure, programmed algorithm. Once a youth is added into the database, only his/her identification number appears on data entry screens and storage files. Individual client files are accessible only to authorized grantee staff and are never transferred to the ACF/FYSB program, HUD, its federal partners, or its contractors.
- Hashed names and social security fields – If a grantee does choose to enter names and social security data into its local HMIS, those fields are masked using an industry standard hashing algorithm (SHA-2) to de-identify all homeless clients that are uploaded into the RHY database.
- Informed Consent - Youth and families are informed about the data collection processes and are asked to sign an informed consent form documenting their awareness and understanding of the data collection process and the use of the data in the aggregate for ACF/FYSB before any data elements are entered into the system. Refusal to participate

in the data collection process does not preclude a youth or family from receiving services.

- System Security/User Identification - Access to each data file within RHY-HMIS is limited by the use of an authorized user identification number, password, and other security procedures. The grantee's management controls all access to data. The terms and conditions of their grant requires security and confidentiality protection. As a condition of funding, each grantee is required to provide a detailed summary of all agency privacy protocols that govern the security of data, files and youth identity.

HUD also provides guidance on HMIS privacy and security practices, which can be found at the following link. https://www.hudexchange.info/programs/hmis/hmis-guides/#hmis-privacy-and-security

11. Justification for Sensitive Questions

There is one HUD data element that is required of all federal agencies (e.g., ACF, SAMHSA, VA) that have integrated with HUD's HMIS that is sensitive in nature, which is a client's Social Security Number (SSN). The rationale for the collection of SSNs is to support the unique identification or each person served and facilitate the process of identifying clients who have been served and allow projects to de-duplicate. For RHY, youth either don't know their SSN or can only provide a partial SSN. In these instances, data are entered using the response option "client doesn't know" or only the partial SSN. The federal statute at 5 U.S.C. Section 522a prohibits a government agency from denying shelter or services to clients who refused to provide their SSN or do not know their SSN.

There are some RHY-HMIS data elements that are designed to collect information that may be considered sensitive. This information pertains to the youth and their family's socio-economic status, mental health, physical health, and information about commercial sex exploitation, overall health, and disability status. It must be noted that, prior to participating in a project, all youth and families are informed that information about them and the services they receive, will be collected, recorded, and submitted anonymously to ACF/FYSB for statistical analysis. As stated above, youth and families are assured that all information is strictly confidential and that their identities are protected. Additionally, program participants are required to sign a statement of agreement that acknowledges that this information as well as their rights have been explained to them.

The RHY program routinely collects data on youth identity to ensure that programs and services are designed and implemented to meet the needs of all young people. Research shows that youth experiencing homelessness often face systemic barriers to economic security and stability. Many have encountered family rejection, trauma, or other adverse experiences that increase their vulnerability and limit access to opportunity. Accurately capturing this data is critical to identifying service gaps, informing effective interventions, and support systems for young people so they can achieve long-term well-being and

economic security.

In support of agency wide anti-trafficking initiatives, RHY-HMIS captures data on both sex and labor trafficking. With this data measure, we can learn exactly how pervasive sex and labor trafficking is in the RHY community. Homeless youth are especially vulnerable to domestic trafficking because they are likely to engage in survival sex in order to have a place to sleep or for other basic needs.

The collection of this information is extremely critical for ACF/FYSB to ensure the effective delivery of services, use of appropriate interventions and the development of individualized youth and family service plans. It is also essential to assess the attainment of long-term programmatic goals and outcomes and for the early identification of trends and challenges in the RHY field.

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

Annual Burden Estimates

The annual number listed represents youth who receive shelter and supportive services from all awarded RHY programs. The total youth served by RHY grant recipients is estimated by RHY funding typology (i.e., BCP, TLP, MGH, SOP) and at program entry/intake and again at program exit. As an example, the estimate for the number of youth served in a BCP, based on estimates from the previous three years, is 123,000 at program entry and 123,000 after the 21 days of emergency shelter when youth exit the BCP. The calculation of the burden hours is based on the time required to complete the RHY-HMIS data standards as part of the integration with HUD's HMIS.

Burden estimates are also calculated for 675 RHY grant recipient staff to enter youth data into their local HMIS regularly and also upload the RHY data to the data repository. Currently, grant recipients upload data quarterly each year.

Annual Cost Estimates

The cost to youth respondents was entered as $0 as these are runaway, street, or homeless youth of which many include minor youth who are being connected to school and older youth who are learning life skills after being on the street and learning job skills.

The cost to RHY grant recipients were calculated using the Bureau of Labor Statistics (BLS) job code for Social Workers [Job Code #21-1029][1] and wage data from May 2022, which is $30.94 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $61.88.

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[1] https://www.bls.gov/oes/current/oes_stru.htm

Information Collection Title	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
RHY-HMIS: Basic Center Program (Intake)	123,000	1	0.38	46,740	15,580	$61.68	$960,974
RHY-HMIS: Basic Center Program (Exit)	123,000	1	0.33	40,590	13,530	$61.68	$834,530
RHY-HMIS: Transitional Living Program (including Maternity Group Home program and TLP Demonstration Programs; Intake)	24,000	1	0.38	9,120	3,040	$61.68	$187,507
RHY-HMIS: Transitional Living Program (including Maternity Group Home program and TLP Demonstration Programs; Exit)	24,000	1	0.33	7,920	2,640	$61.68	$162,835
RHY-HMIS: Street Outreach Program (Contact)	108,000	1	0.5	54,000	18,000	$61.68	$1,110,240
RHY-HMIS: Street Outreach Program (Engagement)	30,000	1	0.28	8,400	2,800	$61.68	$172,704
RHY Funded Grantees (data entry)	308,225	2	0.36	221,922	73,974	$61.68	$4,562,716
RHY Funded Grantees (data submission)—FY24	675	2	0.16	216	72	$61.68	$4,441
RHY Funded Grantees (data submission)—FY25 & FY26	675	8	0.16	864	288	$61.68	$17,821
Estimated Annual Burden Total:					129,924	**Estimated Annual Cost Total:**	**$8,013,768**

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

There are no costs to RHY grant recipients or to youth experiencing homelessness for capital or start up. RHY grant recipients do have to pay a license cost to the HMIS Lead in their local CoC for use of their HMIS to enter data and then extract data for the quarterly data submission to ACF/FYSB. Many grant recipients receive multiple awards and therefore, do not necessarily purchase system licensing for each separate grant awarded. System licensing includes training, ongoing technical support, software and receipt of any system specific instructional documentation. Costs for the use of the local HMIS to the CoCs vary across the country. Grant recipients are allowed to include costs for computers and internet for data entry purposes and system licensing as part of their competitive proposals.

14. Annualized Cost to the Federal Government

The total estimated cost to the federal government over the next three years is $2,697,831. The annualized cost for RHY-HMIS per year is $899,277. These costs cover all aspects of the contract to support providing training and technical assistance, upgrades and maintenance of the data submission repository, data cleaning and analysis, and the dashboard to provide data to RHY grant recipients and the time for Federal Project Officers.

15. Explanation for Program Changes or Adjustments

There are no changes to the RHY-HMIS data standards since the last OMB approval. We have updated the estimated number of respondents based on the current number of grant recipients and recent data about the number of youth served by RHY grantees.

16. Plans for Tabulation and Publication and Project Time Schedule

The RHY-HMIS data collected in HUD's HMIS will be analyzed to determine the characteristics of runaway and homeless youth, their presenting issues, and services provided to them. FYSB also will conduct statistical analyses on information about runaway and homeless youth and project activities in order to develop improvement strategies suggested by statistical trends and patterns.

The data collected through RHY-HMIS will be published by FYSB, as required by Federal law (RHY Act), in a report to Congress on the BCP, TLP/MGH, and SOP programs. The data also support FYSB's annual performance measures as part of the response to the Congressional Justification. Brochures, fact sheets, presentations, and other publications periodically produced by FYSB also will include information gathered through RHY-HMIS. These publications will serve as resources for RHY grant recipients and the general public about the breadth and scope of the runaway and homeless youth projects and will support the identification of trends and issues among runaway and homeless youth served in RHY

programs.

Project Time Schedule (Occurs each FY):

Contractor identifies Continuum of Care lead and distributes RHY-HMIS instruction and definition manual	Annually in September
Live or self-directed online tutorial is made available to new/current grantees	Annually in spring and fall
Contractor Receives, Cleans and Validates Quarterly Data Transfer (Covering January 1 – December 31)	Annually in March, June, and December
FYSB provides RHY-HMIS data in the report to Congress	Bi-annual

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

Not applicable: The OMB expiration date will be displayed at the bottom of the first page of the instrument.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions for this data collection effort.