

Comments in Response to Proposed Information Collection Activity; Chafee Strengthening Outcomes for Transition to Adulthood Project Overarching Generic (Extension)

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State of Utah, Department of Health and Human Services
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The Utah Division of Child and Family Services (DCFS), operating within the Department of Health and Human Services (DHHS), serves as Utah's designated Title IV-E and IV-B agency. The DCFS vision: Safe children, strengthened families is operationalized through its mission to protect children from abuse and neglect and to provide domestic violence services by strengthening families and engaging with communities.

DHHS seeks to express some concerns regarding the proposed extension of the Chafee Strengthening Outcomes for Transition to Adulthood Project (Chafee SOTA) data collection. While DHHS supports efforts to improve outcomes for transition-age youth, we oppose extending this information collection due to its substantial administrative burden, significant data privacy risks, and the limited practical utility of the resulting data.

The following comments outline our opposition and address the specific inquiries requested in 2026-08243 (91 FR 22841) :

Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

DHHS questions the practical utility and necessity of the data collection. The Office of Planning, Research, and Evaluation (OPRE) explicitly acknowledges that the findings from these interventions "will only be suggestive and preliminary" and are "not intended to be

used as the principal basis for a decision by a federal decision-maker".¹ Furthermore, the study relies on non-probability sampling and is designed to produce impact estimates for chosen sites, "not to promote statistical generalization to other sites or service populations".²

Diverting state resources and youth time to participate in rapid-cycle evaluations and single-case designs that do not produce generalizable evidence or inform federal policy lacks sufficient practical utility to justify the effort required.

ACF notes that this study "cannot use existing data from NYTD surveys" because it is testing new approaches. However, DHHS maintains that if the goal is to evaluate outcomes for transition-age youth, federal efforts and funding should be directed toward enhancing and leveraging the existing, established NYTD framework rather than imposing duplicative, intensive data extraction requirements on states. Relying solely on existing, universally collected datasets is the only effective way to protect youth from survey fatigue and shield child welfare agencies from excessive, unfunded administrative burdens.

Furthermore, the extensive data already collected through NYTD—including detailed outcomes on the youth served and surveyed—already provides ACF with an ample amount of information. This comprehensive dataset has been available to the federal government since 2011 calling into question the necessity of continuing to impose duplicative data collection efforts rather than utilizing the wealth of information already at their disposal.

The accuracy of the agency's estimate of the burden of the proposed collection of information

ACF indicates that participation in the evaluation will be limited to selected programs that agree to participate. However, even where participation is voluntary at the program level, the evaluation may still impose an indirect burden on state child welfare systems through required coordination, data sharing, and facilitation of data collection activities. DHHS disagrees with the assertion that the evaluation would not result in additional burden.

¹ Chafee Strengthening Outcomes for Transition to Adulthood Project Overarching Generic. OMB Information Collection Request New Umbrella Generic. Supporting Statement Part A, *July 2023*. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202307-0970-009

² Chafee Strengthening Outcomes for Transition to Adulthood Project Overarching Generic. OMB Information Collection Request New Umbrella Generic. Supporting Statement Part B, *July 2023*. https://www.reginfo.gov/public/do/PRAViewDocument?ref_nbr=202307-0970-009

The Sample Administrative Data Extraction (Instrument E) requires state programs to extract highly specific data elements, carrying a stated burden estimate of 4 hours per respondent/extraction. Furthermore, gathering program documents (Instrument F) is estimated to take an additional hour. Providing these data points requires significant state IT resources and administrative oversight, representing an unfunded mandate that shifts valuable time away from direct service provision.

Additionally, DHHS is highly concerned about the burden placed on youth. The estimated 1.5 hours for focus groups and 0.5 hours for surveys compounds survey fatigue. These same youth are already required to participate in rigorous state-level data collections, including the National Youth in Transition Database (NYTD), making additional survey requests highly burdensome for youth involved in the child welfare system.

Furthermore, based on Utah's extensive experience with collecting NYTD information, DHHS believe ACF's estimated burden for youth participation is fundamentally incomplete. The federal burden estimate of 1.5 hours for focus groups and 0.5 hours for surveys appears limited to the time and resources spent completing the activities by eager, already-present participants. It fails to account for the substantial time, effort, and resources state agencies must expend to locate, contact, encourage, and successfully engage transition-age youth to participate. While it is difficult to precisely quantify the hours spent by the agency trying to engage and encourage youth participation, it is critical to note that the federal estimate severely underrepresents the true administrative burden by not factoring in the intensive outreach required to secure youth participation.

The quality, utility, and clarity of the information to be collected

The data collection poses profound privacy and data security risks. To conduct this evaluation, ACF collects highly sensitive Personally Identifiable Information (PII) including names, Social Security Numbers, dates of birth, and addresses to link client-level data. The Sample Administrative Data Extraction (Instrument E) also requires states to transmit highly sensitive historical details, including a youth's justice system involvement (probation, arrests, and jail time), pregnancy status, disability status, and detailed foster care placement histories.

Combining this level of sensitive administrative data with qualitative data, where youth may be asked to discuss sensitive topics such as mental health trauma, creates substantial risk. Transmitting such extensive PII for small-scale evaluations using alternative methods

introduces data security vulnerabilities that outweigh the limited, "suggestive" quality of the findings.

Furthermore, DHHS has significant concerns regarding the quality and reliability of the qualitative data gathered through the proposed Sample Youth Focus Groups (Instrument C). Historically, transition-age youth populations can be difficult to recruit and engage, which ACF notes often leads to evaluations with "small sample sizes". When focus groups lack sufficient youth participation, they run a high risk of producing biased opinions or falling victim to group sway, where a single dominant participant dictates the entire group's responses. Given these small sample sizes, the resulting qualitative data may not accurately reflect the true, unbiased experiences of the broader youth population, significantly diminishing the quality and utility of the findings.

Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

To truly minimize the burden on both state agencies and youth respondents, ACF should abandon the Chafee SOTA ad-hoc administrative data extractions (Instrument E) and additional youth surveys (Instrument D).

If data collection must proceed, DHHS recommends several alternative strategies to offset the burden on states and youth. First, to streamline the data collection process, ACF should explore using AI technology, chatbots, and augmented systems to conduct initial surveys or interviews, which would significantly reduce the manual administrative effort required.

Additionally, ACF should investigate and share insights on how states currently collect this data to establish best practices and provide helpful models that make collection efforts more efficient. Instead of placing the research burden on the child welfare agency, ACF should support states in leveraging their existing Title IV-E university partnerships to conduct this research, thereby offsetting the workload from frontline child welfare staff.

Lastly, DHHS acknowledges OPRE's intent to offer youth tokens of appreciation ranging from \$15 to \$40, and strongly encourages ACF to review this level of incentive to ensure it adequately pays youth for their time, lived experience, and the high value of their participation in this intensive process.

If ACF intends to pursue ad-hoc data extractions and rigorous research methods, DHHS asks for consideration of an increased Chafee allocation. Increased funding would compensate for the significant financial and staffing resources state agencies will have to divert to fulfill these unfunded administrative mandates. An increased Chafee allocation could be explicitly utilized to fund the technological improvements, greater financial incentives for the participating youth, and the potential for university research partnerships.

We appreciate the opportunity to respond to the request for public comments.