



National Association of Public
Child Welfare Administrators

an affiliate of the American Public Human Services Association

September 30, 2009

Administration for Children and Families (ACF)
Office of Administration
Office of Information Services
370 L'Enfant Promenade, SW
Washington, DC 20447
Attention: ACF Reports Clearance Officer

Dear Reports Clearance Officer:

On behalf of the National Association of Public Child Welfare Administrators (NAPCWA), we respectfully submit the following for your consideration. This letter is in response to the August 5, 2009 *Federal Register's* burden estimates and request for comments on the National Youth in Transition Database (NYTD).

NAPCWA works to enhance and improve public policy and administration of services for children, youth, and families. As the only organization solely devoted to representing administrators of state and local public child welfare agencies, NAPCWA brings an informed view of the problems today's young people in foster care are facing.

States are committed to improved outcomes for their older youth and collecting data on those outcomes. In collaboration with Chapin Hall, NAPCWA established a national advisory committee to provide guidance to the child welfare field on implementing the new database and youth survey. In September 2009, we released an instructional guidebook and architectural blueprint for NYTD.

Today, states are in different areas of development of their new data systems. Some states such as South Carolina, who piloted the survey and outsourced many components of this work already have tools in place to engage current youth in foster care and to maintain contact with those that emancipate from the system. This is also true for states such as Florida, New Mexico, Michigan and Ohio. However, other states are in the beginning planning stages and are scrambling to meet the October 1, 2010 implementation deadline. The economic downturn has forced many of the states to rethink how data collection can be accomplished in a cost-effective and timely manner.

NAPCWA urges ACF to extend the deadline for implementation of NYTD from October 1, 2010 to October 1, 2012 due to the economic downturn. Even though the economy is improving, states have yet to recognize an increase in revenue to help them comply with the requirements and there is minimal federal assistance to implement the requirements (primarily tracking and locating former foster youth that have emancipated from the system).

In the recent Federal Register, ACF asked if the burden estimates were accurate. States believe these estimates do not reflect the amount of time needed for both reporting the data file and surveying youth, which was of particular concern. The time allotted for surveying youth does not include the states' time locating these young people, who many times are not interested in being found, particularly by social services. Additionally, foster youth may have developmental issues or difficulty reading which in all likelihood could increase the time of completing the survey. There may also be language barriers that need to be addressed. NAPCWA encourages ACF to reconsider the .17 hours it takes for states to have each young person fill out the survey and include the time for locating them. Moreover, NAPCWA encourages ACF to change the time requirement of interviewing youth, from 45 days to 90 days after their birthday.

ACF also asked if the collected information was necessary to gauge states' performance on better outcomes for older youth in care. States do not believe either the youth survey or the data collection files are ways for ACF to measure performance. There is no clear answer as to how this data will contribute to improved outcomes for foster youth. There is also a concern regarding the validity of self reported data versus using other administrative data that can be accessed regarding these youth. States feel that there are other means of evaluating State's performance on the Chaffee Independent Living Program. States indicated establishing uniformed measures as a first step to using the data from NYTD to assess states performance.

Finally, ACF asked about ways technology could play a role in helping minimize the states' burden. Several states suggested the use of Survey Monkey, My Space and Facebook. Several states are using today's popular communication tool, as it is ever changing, and so as always allowing flexibility is vital. Particularly, ACF prohibition on linking external data collection systems to SACWIS systems is a major challenge for states.

Again, states are very committed to helping youth in care have better outcomes, particularly when it comes to educational attainment, employment, welfare dependency, homelessness, non-marital childbirth, incarceration and other risky behaviors. NYTD is just one means to help older youth. Another is the new Fostering Connections to Success and Increasing Adoptions Act of 2008 (P.L. 110-351). Several states plan to implement the supporting older youth to 19, 20 or 21 option.

If you have any questions, please do not hesitate to contact Courteney Holden, senior legislative associate, at (202) 682-0100 ex. 249 or Christina Crayton, program associate, at (202) 682-0100 ex. 257.

Thank you for considering our recommendations.

Sincerely,

A handwritten signature in cursive script that reads "Erin Sullivan Sutton".

Erin Sullivan Sutton
President