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Subject: NonSubstantive Change Request –Survey of Youth Transitioning from Foster Care (OMB #0970-0546)

This memo requests approval of nonsubstantive changes to the approved information collection, Survey of Youth Transitioning from Foster Care (OMB #0970-0546).

Background

In April 2020, OMB approved the new information collection request (ICR) for the Survey of Youth Transitioning from Foster Care (SYTFC). The SYTFC is a descriptive study designed to help OPRE and Children’s Bureau identify the prevalence of human trafficking among youth transitioning from foster care; the risk and protective factors associated with increased or decreased risk of trafficking victimization, respectively; and the context surrounding victimization among youth in foster care. Data from this survey of youth aged 18 and 19 years who were in foster care during their 17th year (i.e., when they were 17 years old) will be combined with child welfare administrative data to gain a better understanding of the intersections among youth characteristics, child welfare placements and services, and human trafficking victimization.

The ICR that OMB approved in April included a survey instrument and materials designed to be administered to youth in-person, with both interviewer-administered and Audio Computer-Assisted Self-Interview (ACASI) sections. Data collection has not been initiated due to the COVID-19 pandemic and safety concerns for both interviewers and participants. To allow the study to move forward, the survey instrument and materials have been modified to allow for remote administration via telephone and web. Interviewers will administer consent and a subset of the survey items to youth by telephone, before transitioning youth to a web survey to allow for efficient completion of lower priority and simpler items on their own. We anticipate offering the survey remotely throughout the data collection, in addition to an in-person option if or when it becomes safe to do so.

Overview of Requested Changes

This memo requests the following nonsubstantive changes:

- Modifications to data collection materials to allow for telephone and web-based survey administration;
- Modifications to data collection materials to reflect language update requests by the

- Institutional Review Board with oversight of the study; and
- Modifications to data collection materials to reflect a change in the study contact.

Changes to the Survey Instrument

We propose the following revisions to the approved survey instrument (*Instrument 1: Survey of Youth Transitioning from Foster Care*) for compatibility with remote administration. For consistency and comparability of data, the same survey will be used in both in-person and remote administration. The proposed revisions were made in collaboration with the project team, survivor-advocate consultants, and a survey methodologist.

Changes include:

- Deleting of a substantial number of lower-priority items to reduce the overall burden/administration time and the risk of breakoffs.
- Moving the following priority sections from audio computer-assisted self-interviewing/web survey to telephone interview, to allow the interviewer to offer clarification and potentially respond to distress:
 - Runaway/kicked out from home or foster care
 - Human trafficking
- Moving the following lower-priority and simpler items from interviewer-administered to web mode:
 - Internal and external assets
 - Community resources
- Streamlining response options to allow items to be administered by telephone without use of show cards
- On the advice of survivor-advocate consultants given recent social events, adding items that capture encounters with law enforcement other than being arrested, and victimization by law enforcement figures.

Changes to Participant Materials

We propose the following revisions to existing participant materials for in-person survey administration (Appendices D, E, and F) and the addition of participant materials for remote survey administration (Appendices D-2, E-2, and F-2).

- The In-Person Lead Letter (*Appendix D: Lead Letter*) is a letter and fact sheet that will be provided to sampled participants to inform them of the in-person survey and their rights as a participant. The lead letter was revised to reflect a reduction in burden, updates to language requested by the governing IRB, updates to the study contact, and the addition of free resources and supports for participants should they wish to engage them before or after the interview.
- The Remote Lead Letter (*Appendix D-2: Remote Lead Letter*) is a new letter and fact sheet that will be provided to sampled participants to inform them of the telephone/web survey and their rights as a participant. The remote lead letter mirrors Appendix D with revisions to reflect the telephone and web administration modes and the provision of an electronic gift card.
- The In-Person Consent Form (*Appendix E: Consent Form- SYTFC*) is a form that will be provided to and reviewed with participants in-person to give them the information necessary

to make an informed decision about in-person survey participation. The consent form was revised to reflect a reduction in burden, updates to language requested by the governing IRB, and updates to the study contact.

- The Remote Consent Form (*Appendix E-2: Remote Consent Form*) is a new form that will be provided to and reviewed with participants by telephone to give them the information necessary to make an informed decision about telephone/web survey participation. The remote consent form mirrors Appendix E with revisions to reflect the telephone/web administration modes, the provision of an electronic gift card, and that consent will be obtained verbally. Consent will be recorded electronically on the interviewer's laptop before initiating the telephone survey portion of the remote interview.
- The Data Linkage Form (*Appendix F: Data Linkage Form*) is a form that will be provided to and reviewed with participants in-person to give them the information necessary to decide whether to allow their survey data to be combined with their child welfare data. The data linkage form was revised to reflect updates to language requested by the governing IRB, and updates to the study contact.
- The Remote Data Linkage Form (*Appendix F-2: Remote Data Linkage Form*) is a new form that will be provided to and reviewed by participants on the web to give them the information necessary to decide whether to allow their survey data to be combined with their child welfare data. The remote data linkage form mirrors Appendix F with revisions to reflect the collection of electronic consent within the web survey.

Time Sensitivities

Although we received OMB approval in April and had planned to begin this data collection in July, we have delayed the start of data collection due to the COVID-19 pandemic and the need to revise study protocols and materials to allow for remote survey administration. We would like to begin data collection as soon as possible in order to complete data collection, data analysis, and reporting within the time of our contract.