

**SUPPORTING STATEMENT
FOR OMB CLEARANCE**

Formative Data Collections for Policy Research

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Part A. Justification

1. Circumstances Making the Collection of Information Necessary

The Office of Planning, Research and Evaluation (OPRE), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), intends to request approval from the Office of Management and Budget (OMB) for a generic clearance that will allow OPRE to conduct a variety of formative data collections. Over the next three years, OPRE anticipates undertaking a variety of new research projects in the fields of cash welfare, employment and self-sufficiency, Head Start, child care, healthy marriage and responsible fatherhood, and child welfare. In order to inform the development of OPRE research, to maintain a research agenda that is rigorous and relevant, and to ensure that research products are as current as possible, OPRE will engage in a variety of formative data collections in concert with researchers and practitioners throughout the field. OPRE envisions using a variety of techniques including semi-structured discussions, focus groups, telephone interviews, and in-person site visits, in order to integrate the perspectives of program operators, policy officials and members of the research community.

Following standard Office of Management and Budget (OMB) requirements, OPRE will submit a change request to OMB individually for every group of data collection activities undertaken under this generic clearance. OPRE will provide OMB with a copy of the individual instruments or questionnaires, as well as other materials describing the project. Included in this submission are examples of questionnaires and discussion guides similar to those that will likely be submitted under this clearance.

Currently the Administration for Children and Families (ACF), Office of Planning Research and Evaluation (OPRE) conducts research on a wide variety of policy and programmatic areas. OPRE's research serves to analyze current programs, explore options for program improvement, and experimentally test alternative policy and program designs. To remain in compliance with the Paperwork Reduction Act while continuing to produce research that is relevant to current policy debates, OPRE has often relied on nonsystematic conversations with 9 or fewer individuals because time or budget limitations prevented a more systematic approach, or OPRE conducted highly systematic and comprehensive data collection activities (such as our recent survey of Diversion programs) after securing OMB approval. Under this generic clearance, ACF/OPRE seeks approval to conduct discussions that are more routinized and consistent and held with more respondents, but that are not highly systematic or intended to be statistically representative. The specific methods proposed for coverage by this clearance are described below. Also outlined are the proposed procedures for keeping OMB informed about the various discussions, interviews and data collections, as well as the nature of the research activities being conducted.

All of the methods and the data approved under this clearance will be used primarily for the purposes of informing OPRE and ACF's internal decision-making, research planning, and contextualization of research findings. Under this clearance a variety of approaches will be used

and the exact nature of the questionnaires and the samples is undetermined at present, but we expect that they will include activities on a variety of research projects. The particular samples will vary based on the content of the discussion and the programs or policies of interest.

Semi-structured discussions or conference calls: Semi-structured discussions or conference calls with multiple participants are conversations between researchers and one or more informants around a series of topics, potentially including probing questions and follow-up questions. Unlike a structured survey, where the interview follows a prescribed set of questions or a script, semi-structured discussions are designed to be more flexible and responsive to the direction of the conversations prompted by the respondent's comments. Semi-structured discussions are useful because they allow for an interactive approach to information gathering, while maintaining a modicum of consistency across respondents.

Focus groups: This method involves group sessions guided by a moderator who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups can be more efficient than individual interviews, since multiple individuals participate at one time. In addition, the group dynamics can yield richer responses than individual interviews for some types of topics.

Telephone interviews: Interviews are one of the oldest and most widely used methods of data collection. With technological advances, telephone interviews have become an efficient source of systematic data collection. Typically structured around a prescribed set of questions, telephone interviews can be done over the phone rather than face-to-face or by mail. Telephone interviews can allow for a relatively exhaustive set of questions to be administered in a short period of time with minimum burden to the respondents.

In-person observations and site visits: In-person observations and site visits allow researchers to contextualize and understand complex situations. Observation of events and situations, the context in which programs or policies are played out, and their interpretation by participants and spectators before, during and after, allows for more information to be gathered and meanings to be understood than many other forms of data collection. For program evaluators or policy researchers, observational data permit the understanding of a program or treatment to an extent not entirely possible using only the insights of others obtained through interviews.

Attachments A, B and C include illustrative examples of OMB-cleared ACF instruments which represent the type of materials for which ACF would seek approval under this clearance.

Procedures for Clearance

Since the types of information gathering methods included under the umbrella of the clearance are so varied, it is impossible to specify at this point what kinds of activities would be involved in any particular data collection. However, in submitting a change request under this clearance, ACF will provide OMB with a copy of all instruments and materials at the time of the request. When discussion or interviews are conducted, all the questionnaires to be used will be provided. For site visits, the protocols for data gathering would be submitted.

ACF understands that requests for information or comments on substantive issues may be raised by OMB within 10 working days of receipt of testing materials. ACF will make separate submissions for clearance of full, non-developmental data collection efforts. ACF will send OMB an annual report summarizing the number of hours used, as well as the nature and results of the activities completed under this clearance.

2. Purpose and Use of the Information Collection

The information collected will be used by ACF to evaluate and improve ACF's research and evaluation studies including research planning and contextualization of research findings.

3. Use of Improved Information Technology and Burden Reduction

To the fullest extent possible, ACF and its contractors will attempt to utilize automated methods for data collection in order to reduce any burden on potential respondents.

4. Efforts to Identify Duplication and Uses of Similar Information

This research does not duplicate any other work being done by ACF. The purpose of this clearance is to better inform and improve the quality of ACF's research and evaluation. Data gathering under this request would not be done under other circumstances due to the time constraints of seeking clearance for each individual data collection. To the maximum extent possible, we will make use of existing data sources before we attempt to utilize the additional field work sought under this clearance.

5. Impact on Small Businesses or Other Small Entities

The research to be completed under this clearance will not impact small businesses.

6. Consequences of Less Frequent Collection

It is anticipated that all of the information collected under this generic clearance would involve a one-time data collection. If this project were not carried out, the quality of the research and its relevance to public policy and practitioner concerns among a variety of research projects would likely suffer.

7. Special Circumstances

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

Consultation with staff from ACF contractors carrying out research and evaluation surveys will occur in preparation for and in conjunction with the fielding of these data collections under this request. Additionally, ACF has consulted with colleagues in other federal agencies, e.g., the Census Bureau and with staff at OMB. A notice was published in the Federal Register on April 8, 2008 (vol. 73, no. 68, p. 19072, inviting public comment on our plans to submit this request. In response to this notice, we received no comments.

9. Explanation of Any Payment or Gift to Respondents

Respondents for the activities under this clearance may receive a small stipend. This practice has proven necessary and effective in recruiting subjects to participate in this type of research and is also used routinely by ACF and by other Federal agencies. The incentive for participation in activities under this clearance will be explained as part of each change request.

10. Assurance of Confidentiality

All respondents who participate in research under this clearance will be read a statement that will explain the study and will assure individuals of their privacy as respondents. Each statement will be included with the change requests submitted under this generic clearance. For personal visit and telephone interviews, this information will be conveyed verbally by the interviewer. For observation and site visits, respondents will also be notified in writing. For self-administered questionnaires, the information will be included in the mailing package, either on the questionnaire or the instructions.

11. Justification for Sensitive Questions

Most of the questions that will be included in these activities will not be of a sensitive nature and should not pose a problem to respondents. However, it is possible that some potentially sensitive questions may be included under this clearance. For interviews that include questions of a sensitive nature, ACF will provide a full explanation when submitting a change request.

12. Estimate of Hour Burden

The total estimated respondent burden is 300 hours per year for the three year clearance period.

ANNUAL BURDEN ESTIMATES

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Annual Burden Hours
Semi-Structured Discussion and Information- Gathering Protocol	600	1	.5	300

Estimated Total Annual Burden Hours:

300

This estimate is based on consultation with research contractors with whom we have partnered and also on advice from OMB. A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are unknown at this time.

13. Estimate of Cost Burden

There is no cost to respondents for participating in the research being conducted under this clearance.

14. Cost to Federal Government

We cannot anticipate the actual number of participants, length of interview, and/or mode of data collection for the surveys to be conducted under this clearance. However, assuming a maximum of 600 respondents per year at a cost of \$100 per response, our estimate is that the maximum cost would be \$60,000. However, costs for each individual data collection will be covered by the individual research and evaluation projects conducting the research.

15. Reason for Change in Burden

The burden change is due to this request being new.

16. Project Schedule

Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to continue more or less continuously throughout the duration of the clearance. For each change request submitted, we will provide OMB with an overall project schedule for each individual request.

17. Request to Not Display Expiration Date

No exemption is requested.

18. Exceptions to the Certification

There are no exceptions to the certification.

Part B. Collections of Information Employing Statistical Methods

1. Universe and Respondent Selection

Given the nature of the information collection activities under this request, the universe and respondent selection varies considerably. However, for the most part, the discussions, interviews and observations undertaken as part of this clearance will involve purposive samples with respondents selected either to cover a broad range of groups or to include specific characteristics related to the topic of the study. Since these information collections will be undertaken primarily for internal decision-making, research planning, and contextualization of research findings, ACF does not, at this time, anticipate undertaking a statistically sophisticated strategy for selection. A description of the plans for selecting respondents for each individual information collection will be provided to OMB as part of each change request.

2. Procedures for Collecting Information

Data collection procedures under this clearance will be varied, and will most likely include personal visits, telephone discussions, and perhaps mail surveys. More specific information about data collection procedures will be contained in the description provided to OMB as part of each change request.

3. Methods to Maximize Response

In general, callbacks will be used to maximize response rates for telephone field surveys; reminder phone calls or letters or second questionnaires will be used to maximize response rates in mail surveys. Reminder phone calls and/or letters to participants will be used to encourage them to keep their appointments. More specific information will be contained in the description provided to OMB as part of each change request.

4. Testing of Procedures

Although it is impossible to define the testing procedures for each collection under this submission, in most cases, prior to conducting individual data collections the potential instruments and procedures will be pre-tested with 9 or fewer individuals. Results from these pre-tests will be incorporated into any final instruments before they are submitted to OMB.

5. Contacts for Statistical Aspects and Data Collection

Advice on statistical aspects of each individual data collection will be sought as the data collection is developed. Depending on the nature of the research, ACF/OPRE staff and research

and evaluation contractors will have responsibility for data collection and analysis. Brendan Kelly is the ACF contact person for general questions about data collection and analysis. His contact information is attached to this request. Other contact persons for questions regarding data collection and statistical aspects of the design will be provided to OMB at the time the change requests are submitted.

Attachments A, B and C —Examples interviews, site visits or surveys of the type to be conducted under this clearance.