

# **Emergency Clearance**

*Supporting Statement Part A for OMB Approval*

**Mother and Infant Home Visiting Program Evaluation (MIHOPE)**

*January 2012*

## **PART A. JUSTIFICATION**

The Administration for Children and Families (ACF) requests permission to contact states for the purpose of gathering information that will be used to facilitate the selection of states for the Mother and Infant Home Visiting Program Evaluation (MIHOPE). Permission to contact each state for this purpose is requested under ACF's emergency clearance for information gathering. The study team will only collect information relevant to site recruitment. The study team will not collect or disclose information in a way that would identify any individuals. A separate package will be submitted requesting clearance for the full MIHOPE project, including all data collection instruments and procedures, data analyses and the reporting of study findings.

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

The Administration for Children and Families, Office of Planning Research and Evaluation (OPRE), and Health Resources and Services Administration (HRSA) within the U.S. Department of Health and Human Services (HHS) have launched a national evaluation called the Mother and Infant Home Visiting Program Evaluation (MIHOPE). The evaluation was authorized by a provision in the Patient Protection and Affordable Care Act of 2010 (ACA) (P.L. 111-148), signed by the President on March 23, 2010. Using a mix of research methods, this evaluation will inform the federal government about the effectiveness of the newly established Maternal, Infant and Early Childhood Home-Visiting (MIECHV) program in its first few years of operation, and provide information to help states develop and strengthen home visiting programs in the future. By systematically estimating the effects of home visiting programs across a wide range of outcomes and studying the variation in how programs are implemented, MIHOPE will provide valuable information on the effects of these programs on parents and children. This includes investigating the effects of home visiting on maternal and child well-being, how those effects vary for different home visiting approaches, and how variations in program design and implementation influence program fidelity and impacts.

The MIHOPE study includes two phases of data collection: Phase 1 includes site selection, baseline data collection and implementation data collection; Phase 2 includes follow up data collection for measuring impacts. The purpose of the current document is to request approval to collect information from states and local home visiting programs to determine which states and program sites will participate in the study. The ACA requires a Report to Congress on the results of the evaluation by March 30, 2015. In order to meet this statutory deadline the MIHOPE study must begin site recruitment by January 31, 2012. Therefore the use of the normal clearance procedures is likely to prevent the statutory deadline to be missed.

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

The overall goal for site recruitment in MIHOPE is to select 85 sites across approximately 12 states. As discussed in more detail in Part B of this Supporting Statement, the evaluation will include 85 sites to allow it enough statistical power to explore the relationship between local program features and program impacts. For example, this analysis could explore how program impacts vary with the duration of home visits, the background and training of home visitors, the support provided by supervisors for home visitors, the clarity of the goals of the local program, the intended targets of the national model being used, and so on. The evaluation will include 12

states to balance the gains in statistical power from including more states with the costs evaluation of including more states. Each additional state would likely provide greater variation in program features and consequently give the evaluation greater ability to link program features to program impact, but each additional state would add to the cost of recruiting states and collecting data on both program implementation and family outcomes.

States and their local program sites will be selected for MIHOPE in 2012 based on a variety of characteristics including: the type of home visiting model, geography, urbanicity, target population, and research feasibility. There is currently limited documentation available to aid site selection. The study team reviewed and analyzed the MIECHV implementation plans each state submitted to the U.S. Department of Health and Human Services. These plans provided a general overview, however, they did not provide consistent information to enable us to make selections. For this reason, the study team will need to contact states and their local programs beginning in 2012 to confirm what was collected from the plans and request some additional information. This information needs to be collected in early 2012 to ensure that baseline data collection can begin in July 2012. The remainder of this section describes the study team's plans for contacting states and local programs and how the information will be used.

#### Introduce the evaluation to state administering agencies (*January 2012*).

Regional project officers from HRSA will send an email to the state administrators overseeing the MIECHV programming to introduce the study and its goals, introduce the team that will be doing the study on HHS's behalf, and alert state administrators that a study team member may be in contact to explore whether their state would be a good fit for the evaluation.

#### Telephone contact with state administrators to gather information (*January-April 2012*).

The study team staff will call state administrators to schedule a longer telephone appointment to collect the minimum information necessary that allows us to understand the universe of states using MIECHV funds and proceed to the next stage of site recruitment. The study team will confirm the appointment by email and attach a list of the information we hope to collect during the phone call. The appointment confirmation will include several attachments (Attachment 1): (1) a project description, which explains the study, the process for selection and enrollment, the project timeline; (2) a set of frequently asked questions, which responds to potential questions state administrators may have about the study; (3) a site participation overview, to provide states with an understanding of what participation in the study would entail for their local home visiting programs and the process for their involvement; (4) the information we hope to go over during the telephone appointment; and (5) a protocol for the telephone call with State administrators.

Using a protocol, the study team will initiate the longer telephone appointment to answer any questions the state administrator might have regarding the study and ask for a few key characteristics of each MIECHV supported program site. This will enable us to understand the number of local MIECHV programs, using the study's definition of a local program.<sup>1</sup> The

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<sup>1</sup>At this time, we define a site as a home visiting program with local administration (separate office and supervision), but the study team will use these conversations to try and understand how the definition may vary across states.

information collected will also help the study team classify these sites according to three main characteristics: geographic region, program model, and urbanicity. The team will use this information, to select approximately 18 high priority states that best suit the evaluation needs.

In-person visits and teleconferences to key states and sites for detailed discussion about the evaluation (March-December 2012).

To recruit and reach agreement with 12 states and 85 local program sites from among the high priority states, the study will visit a state up to three times. Site recruitment staff, working in teams of two, will meet in-person and by phone to discuss the evaluation with state and local program site staff. These visits and telephone calls will be used to collect information to determine which pool of states and sites best meet the criteria for site selection. After each visit, the study team is expected to narrow the pool of eligible states and sites based on the information collected.

A first round of visits will be made to 18 states. An agenda will be used to guide the discussion. The study team will introduce sites to the study using a PowerPoint presentation. Using semi-structured protocols, conversations with state staff will be designed to gain an understanding of the processes for accessing state administrative records and to underscore the state administrators' importance in helping to recruit sites. Important questions concern sites' administrative structures, programmatic experience, when they plan to begin MIECHV services, the community service context, and program size. Initial visits may include groups of sites, but the study team would eventually need to meet with each site individually (although not always in person) to understand their program flow, respond to questions and concerns, and discuss the terms of an agreement. Materials related to the first round of visits with state administrators are shown in Attachment 2, including the agenda, PowerPoint slides, and protocol.

After the first round of visits, the study team will narrow the pool of eligible states and will schedule follow-up visits to 12-15 states and teleconferences and visits with roughly 120 sites to insure that we will have 85 from which to choose. Using semi-structured protocols, the goals of the follow-up conversations with state staff are to gain an understanding of the processes for accessing state administrative records, and to underscore the state administrators' importance in helping us to recruit sites. An agenda for the follow-up visits to states and topics for discussion are shown in Attachment 3.

Important questions in our discussions with program sites are about their administrative structures, their programmatic experience, when they plan to begin MIECHV services, the community service context, and their program size. Meetings would be scheduled with each site individually (although not always in person) to understand their program flow, respond to questions and concerns, and discuss the terms of an agreement. Materials to be used in conversations with local program directors are provided in Attachment 4.

### **A.3. Use of Improved Information Technology and Burden Reduction**

The burden on state administrators and local program directors is minimal and the study team plans to use improved information technology wherever possible. When information is available from the internet, it will supplement requests for information. To the extent possible,

meetings will be centralized or done by telephone to reduce burden on states and their local program directors.

#### **A.4. Efforts to Identify Duplication and Use of Similar Information**

There is currently no comprehensive list of home visiting sites by model within each state that could be used by the study team to select states for participation in MIHOPE. After careful review of the MIECHV plans submitted by each state, the needed information was not found.

#### **A.5. Impact on Small Businesses or Other Small Entities**

No small businesses are impacted by the data collection in this project.

#### **A.6. Consequences of Collecting the Information Less Frequently**

The study team proposes a multi-staged process for gathering information from states and local MIECHV program sites. The study team's approach attempts to limit the scope of the conversations to just the information needed for each stage of site recruitment and to centralize meetings as much as possible. If site recruitment is not rolled out as designed, the selection process will take longer and we will not be able to respond to Congress' mandate to provide information about the program by 2015. Baseline data collection for MIHOPE is scheduled to begin in Q3 2012. To adhere to this schedule, programs must be contacted in Q1 2012.

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

There are no special circumstances requiring deviation from these guidelines.

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

The Federal Register Notice soliciting comments for the MIHOPE emergency clearance package was posted in the Federal Register, Volume 76, Number 246, page 79688 on December 22, 2011. Comments received from the Notice and responses are attached in Appendix I. The Notice requested an emergency clearance with an OMB approved modified comment period of 21 days. All comments came to ACF and were shared with OMB.

The Secretary's Advisory Committee on Maternal, Infant and Early Childhood Evaluation met on December 6-7, 2011 and provided consultation on the proposed site recruitment and selection activities.

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

State administrators and local program directors are not paid for providing the information that is sought.

#### **A.10. Assurance of Privacy Provided to Respondents**

State administrators and local program directors will be asked a set of questions about their

state’s home visiting sites. The information collected will be about programmatic administration and not about individuals being served by the program. For example, states will be asked to provide the names and addresses of each local home visiting program using MIECHV funding, and local program directors will be asked to provide the estimates of the number of families they enroll. The study team will only collect information relevant to site recruitment. The study team will not collect or disclose information in a way that would identify any individuals. The study team does not plan to collect any sensitive information and therefore has not included a statement indicating this information would be kept private to the extent permitted by law.

**A.11. Justification for Sensitive Questions**

There are no sensitive questions.

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

State administrators and local program directors will review materials and speak with a study team member about the state’s home visiting programs using MIECHV funding. These persons will not incur any expense other than the time spent answering the few questions.

The estimated annual burden for program directors and on-site coordinators is listed in Table A.1. The total annual burden for this information gathering activity is expected to be 285 hours.

TABLE A.1

ESTIMATED ANNUAL RESPONSE BURDEN AND ANNUAL COST

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Telephone contact with state administrators	49	1	1	49	\$28.70	\$1,406.30
First round visits with state administrators	18	1	1.5	27	\$28.70	\$774.90
Second round visits with state administrators	15	1	1.5	22.5	\$28.70	\$645.75
Visits and calls with local program directors	120	1	3	360	\$28.70	\$10,332.00

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Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
<b>Estimated Total</b>				<b>458.5</b>		<b>\$13,158.95</b>

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

**Estimates of Annualized Costs.** To compute the total estimated annual cost, the total burden hours were multiplied by the estimated average hourly wage for state administrators and local program directors (see Table A.1). According to the Bureau of Labor Statistics' Current Population Survey 2011, the mean salary for full-time employees over age 25 with a bachelor's degree or higher is \$28.70 per hour.

### **A.14. Annualized Cost to Federal Government**

The total cost to the federal government of contacting and gathering information during site recruitment under the terms of the MIECE contract is estimated to be \$960,000 including direct and indirect costs and fees. This \$960,000 is also the annual cost since recruitment will only occur for one year between January 2012 and January 2013.

### **A.15. Explanations for Program Changes or Adjustments**

There are no program changes or adjustments.

### **A.16. Plans for Tabulation and Publication and Project Time Schedule**

The information collected will be used primarily during the first phase of the project to inform site recruitment. All contacts with state administrators and local program directors for the purpose of collecting basic information on a state's home visiting sites will occur in Q1 2012 through Q1 2013. State administrators will be emailed information regarding the study and called by a member of the study team in Q1 2012. Emails, calls, and site visits to local program directors will occur in Q1 2012 through Q1 2013. All contacts with state administrators and local program directors made for the purpose of site selection will be completed by January 2013.

Select information about the numbers and type of sites may also be tabulated and used in a report to Congress in 2015 and publications during the second phase of the project (dates to be determined). Plans for the use of data collected during Phase 1 and Phase 2 of the project will be explained in subsequent packages.

### **A.17. Display of Expiration Date for OMB Approval**

The OMB number and expiration date will be displayed at the top of the first page of the marketing materials and protocols. We will offer to read the OMB number and expiration date at the start of the call.

**A.18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this data collection.