

SUPPORTING STATEMENT A
FOR OMB CLEARANCE

Formative Data Collections for Policy Research
0970-0356

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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), requests 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 related to 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, and telephone or in-person interviews, 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 generic IC 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 previously approved instruments under this generic IC. See Attachment A.

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 provide further understanding of current programs and service populations, explore options for program improvement, and assess alternative policy and program designs. Under this generic clearance, ACF/OPRE seeks continued approval to conduct discussions with more than 9 respondents that can inform future research, 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 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 some 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 or in-person interviews:** Interviews are one of the oldest and most widely used methods of data collection. Typically structured around a prescribed set of questions, interviews can be done over the phone or face-to-face. With technological advances, telephone interviews have become an efficient source of systematic data collection.

Since a primary goal of the information collections conducted under this clearance is to improve the evaluations of ACF programs and demonstrations, respondents will include key stakeholder groups involved in ACF projects, state or local government officials or service providers, or experts in fields pertaining to ACF research. In general, we expect that information collections conducted under this clearance will involve a minimum of ten respondents and a maximum of no more than 100 respondents.

Attachment A provides an example of a previously approved instrument under this generic IC.

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 generic IC request under this clearance, ACF will provide OMB with a copy of all instruments, protocols, or other materials at the time of the request.

ACF understands that OMB will make every effort to review materials for generic ICs received by OMB within 10 working days. ACF will make separate submissions for clearance of full, non-developmental data collection efforts. ACF will send OMB a report summarizing the number of hours used, as well as the nature and results of the activities completed under this clearance when requesting a renewal of the generic IC. Attachment B provides an overview of ACF's use of this generic IC during the first three years of approval.

2. Purpose and Use of the Information Collection

The information collected will be used by ACF to contribute to 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 feasible without this generic clearance 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. A notice was published in the Federal Register on June 10, 2011 (vol. 76, no. 112, p. 34078) 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

Payments are unlikely to be sought for IC under this generic clearance, unless participants are requested to participate in focus groups or to complete an unusually long interview. The incentive for participation in a focus group is up to \$75 unless otherwise specifically justified.

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 inform individuals of the extent of their privacy as respondents. In some cases, activities conducted under the generic clearance will not involve pledging confidentiality to participants. Such situations might include discussions with grantees, after which information is likely to be shared with others involved in the research project.

Individual statements will be included with each generic IC submitted under this clearance. When confidentiality is necessary – such as where the information being requested, about either an individual or an organization may be sensitive – the pledge of confidentiality will be made under the Privacy Act. For in-person and telephone interviews, this information will be conveyed verbally by the interviewer. For in-person interviews, 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. ACF will protect respondent data to the fullest extent specified under the authority of the Privacy Act. An example of a typical Privacy Act statement is provided below:

ACF and its contractors will take all measures necessary to protect the privacy of individuals participating in the survey. These procedures for assuring and maintaining confidentiality will be consistent with the provisions of the Privacy Act and with ethical guidelines of professional organizations. Interviewers will attempt to conduct the interview at a time and place that allows the utmost privacy for respondents. Respondents will receive information about confidentiality protections at the outset of the interviews. They will be informed that all of the information they provide will be kept private to the extent permitted by law and that study results will be presented only in aggregate form. Participation in the survey will be voluntary. At the time of data collection for the survey, participants can choose not to participate in the survey. In addition, although every effort will be made to keep research records private, there may be times when federal or state law requires the disclosure of such records, including personal information. This is very unlikely, but if disclosure is ever required, the research team will take all steps allowable by law to protect the privacy of personal information.

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 generic IC.

12. Estimate of Hour Burden

The total estimated respondent burden is 1600 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	1,600	1	1	1,600

Estimated Total Annual Burden Hours: 1,600

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

	Number of Respondents	Responses Per Respondent	Average Burden/Response (hours)	Total Burden (hours)	Hourly Wage Rate	Annualized Hourly Costs
Semi-Structured Discussion and Information-Gathering Protocol	1,600	1	1	1,600	\$26.06	\$41,696

To calculate the annualized cost to respondents for the hour burden, we assume that the typical respondent will be social scientists, other recognized national experts, state or local government officials or service providers. Based on data on our expected respondents from the Bureau of Labor Statistics, we use a mean hourly wage of \$26.06¹, and calculate the total annualized costs for respondents as \$41,696.

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 1600 respondents per year at a cost of \$100 per response, our estimate is that the maximum cost would be \$160,000. 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

This request is to renew the use of generic clearance for another 3 years. There is no change in burden requested.

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 generic IC 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.

¹ This is an average of the mean hourly wages for social scientists (\$37.45), state government officials (\$23.89), local government officials (\$22.12), and social service occupation (\$20.76).