

# MEMO

To: Brenda Aguilar and Jen Parks; OMB  
From: Office of Planning, Research and Evaluation  
Subject: Summary of revisions to OMB # 0970-0355  
Date: March 23, 2012

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Thank you for your thoughtful feedback on our cognitive interview and pilot test generic clearance plan. Below is a summary of the specific comments provided and the changes we made in response to these comments.

**Comment 1:** We are concerned about ACF's plans to do the pilot test (n~400) under a generic. We suggest instead that the pilot test be removed from this submission, and the cognitive lab work be completed before submission of the pilot test and main study (coupled together) as a regular clearance request. Then, should the pilot suggest changes in instrument content but the overall design and burden of the study remain the same, ACF could submit a nonsubstantive change to the instruments in advance of launching the main study.

**Response:** As per your recommendation, we revised the generic clearance package so that it now only includes the cognitive interviews. Revisions have been made to statements A and B and appendices removed, as necessary. In addition, as per the comments, we will include the pilot test in a separate full OMB package along with the field test of the measures, and will plan to submit a nonsubstantive change to the instruments if changes are necessary after the pilot test and before the field test. Because of these changes, we reconsidered the timeline for the cognitive interviews and decided to extend it for each round to give us more time for recruitment and write-up of results. Section A.16 reflects these adjustments.

**Comment 2:** ACF indicates that it wants to give \$50 for cog labs, though the agency estimates the burden will be 2.25 hours. This level seems a bit high for center directors to allow access to the staff. Has ACF considered whether access would still be given with \$25 instead?

**Response:** We believe there was a miscommunication about the role of center directors in the cognitive interviews (as opposed to the pilot test). Specifically, we propose giving center directors \$50 for participating in cognitive interviews themselves, not solely for providing access to staff. The proposed incentive amount (\$50) and burden hours (2.25

hrs. for eligible participants) for the cognitive interviews are consistent across parents, providers, and center directors. The language in statements A and B has been revised to clarify this.

**Comment 3:** Please add the OMB control number and PRA statement to the Thank you letters (Appendices R and S), the signup sheet (Appendix Q), the brochure (Appendix T), and the FAQs (Appendices U, W, and X).

**Response:** We added the OMB control number and expiration date to all attachments pertaining to the cognitive interview study.

**Comment 4:** We noted that ACF is using the term "confidential" in the cover letters, but not collecting this under a statute that guarantees confidentiality. Recommend revising to use the term privacy instead.

**Response:** We apologize for this error, and have revised all appendices relevant to the cognitive interviews so that they include the PRA statement, 'private to the extent permitted by law', and made sure that the term 'privacy' has replaced 'confidentiality' in all consent forms (Appendices B, D, and F).