

Formative Data Collection (OMB Number 0970-0356)

**SUPPORTING STATEMENT PART A
FOR OMB CLEARANCE**

ACF Behavioral Interventions to Advance Self-Sufficiency (BIAS) Project

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Submitted By:

Office of Planning, Research and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

7th Floor, West Aerospace Building
370 L'Enfant Promenade, SW
Washington, D.C. 20447

Part A: Justification

The Office of Planning, Research and Evaluation (OPRE) at the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), requests permission to conduct focus groups and telephone and in-person interviews with state and local human services program staff and clients. This activity is planned as part of ACF's Behavioral Interventions to Advance Self-Sufficiency (BIAS) project, which is applying behavioral insights to issues related to operations, implementation, structure and efficacy of social service programs and policies and testing behaviorally-informed interventions.

Permission to collect information for this limited purpose is requested under ACF's generic clearance for Formative Data Collection for Informing Policy Research (OMB Number 0970-0356). The information collected will be used for internal purposes, to help ACF make decisions about this research project.

1. Circumstances Making the Collection of Information Necessary

Many social programs rely crucially on active decisions made by individuals to apply for benefits or to participate in a program. Often, people are required to undertake a host of specific activities—from completing forms and showing proof of eligibility to arranging travel and child care—to keep their benefits or continue program participation. Principles of behavioral economics—a blend of psychology and economics—can help explain how people make decisions, which ultimately affects the benefits and services received from programs.

The BIAS project is the first major opportunity to apply a behavioral research lens to programs that serve poor families in the United States and thus, the information that will be collected from the focus groups and interviews is not currently available and the proposed data collection is necessary to obtain this information. The information collected will be used to inform ACF's decisions about the direction of the BIAS project. The protocols for the focus groups and interviews proposed in this request have been informed by reviews of available information such as program manuals and available administrative data that provide an overall picture of program goals and approach, client size, capacity and systems. The focus groups and interviews will provide greater detail and depth to our understanding of human services programs' operations.

2. Purpose and Use of the Information Collection

We plan to visit selected program sites to conduct focus groups and interviews. In addition, we will conduct interviews with program operators by phone. These activities gather structured in-depth information to understand the program process from both the administrative and client perspectives.

Focus groups and interviews are essential to identifying the points in the outreach and delivery of services, or in the client's experiences, that are most amenable to a behavioral intervention. They will allow the BIAS team to map a correspondence between the insights of behavioral science with the on-the-ground implementation of programs and subsequent client experiences.

The information collected under this clearance will be used to help ACF make decisions about the direction of the BIAS project, such as the type of the behavioral intervention that may be pilot tested in a future phase of this project.

3. Use of Improved Technology and Burden Reduction

Due to the nature of the focus groups and interviews, and the small sample sizes, it is not appropriate to use information technology such as computerized interviewing. However, we will audiotape conversations in focus groups to be more efficient when note-taking and compiling the data. Due to the audiotape, respondents will be able to speak without having the researchers interrupt or slow them down to take notes.

4. Efforts to Identify Duplication and Use of Similar Information

To the maximum extent possible, we will make use of existing data sources, such as publicly available documents as well as documents provided by the program sites, before we undertake the field work sought under this clearance. The information that will be collected via the focus groups and interviews does not already exist and does not duplicate any other work being done by ACF.

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

This is a one-time collection.

7. Special Circumstances

There are no special circumstances requiring deviation from these guidelines.

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

The first Federal Register notice for ACF's generic clearance for information gathering was published in the Federal Register, Volume 76, page 34078 on June 10, 2011.

The second Federal Register notice was published in the Federal Register, Volume 76, page 53682 on August 29, 2011.

9. Explanation of Any Payment or Gift to Respondents

No payments to respondents are proposed for this information collection.

10. Assurance of Privacy Provided to Respondents

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. (See Attachment A) Participants will be told verbally that their conversations will not be shared with anyone outside the research team or federal staff and will not be publicly released in a form that identifies them.

11. Justification for Sensitive Questions

There are no sensitive questions in this data collection.

12. Estimates of Annual Burden Hours and Costs

The proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses other than the time spent in conversation with ACF. The estimated annual burden is listed in Table 1. The estimated annual burden for this information gathering activity is expected to be 156 hours.

Participants will include administrative staff, direct service staff, and clients of human services programs. Field visits will be conducted at up to 12 organizations over a two year period. In total, we will conduct two focus groups with approximately eight participants and ten interviews at each site. The annual number of participants is expected to be 156 people, for a total of 312 participants over two years.

To compute the total estimated annual cost for staff and administrators, the total burden hours were multiplied by \$33.90, the mean hourly earnings for management, professional and related workers in the civilian workforce as reported by BLS NCS (2010).¹ To compute the total estimated annual cost for clients, the total burden hours were multiplied by \$15.50, the mean hourly earnings for high school graduates reported by BLS NCS (2010). To compute the average cost across staff, administrators, and clients, \$33.90 and \$15.50 were averaged for an average hourly wage of \$24.73. The total estimated annual cost is \$3,857.

Instrument	Annual Number of Respondents	Number of Responses per Respondent	Average burden Hours per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Protocol for use with Administrators	26	1	1	26	\$33.90	\$881
Protocol for use with Staff	52	1	1	52	\$33.90	\$1,762
Protocol for use with Clients	78	1	1	78	\$15.55	\$1,213
Total	156			156	\$24.73	\$3,857

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

The information collection does not place any other cost burden on respondents.

14. Annualized Cost to Federal Government

The annual cost to the federal government for this data collection will be approximately \$7,000.

15. Explanations for Program Changes or Adjustments

This is an additional generic clearance, submitted under ACF/OPRE generic clearance 0970-0356.

¹ U. S. Department of Labor, Bureau of Labor Statistics “National Compensation Survey: Table 1: Summary Mean hourly earnings and weekly hours for selected workers and establishment characteristics.” 2010. <http://www.bls.gov/ncs/ocs/sp/nctb1344.pdf>.

16. Plans for Tabulation and Publication and Project Time Schedule

All focus groups and interviews will occur within two years of OMB clearance. Focus groups will be audiotaped, and notes will be taken during focus groups and interviews. A brief summary of each activity will be written for internal purposes. This information will be used by ACF to make decisions about the direction of the BIAS project. This phase of the project will conclude by December 2014.

17. Display of Expiration Date for OMB Approval

The OMB number and expiration date will be displayed at the top of any handouts given in conjunction with the discussions. We will offer to read the OMB number and expiration date at the start of any conversation or focus group.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.