

## MEMORANDUM

**TO:** Josh Brammer  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**FROM:** Victoria Kabak  
Office of Planning, Research, and Evaluation (OPRE)  
Administration for Children and Families (ACF)

**DATE:** September 4, 2019

**SUBJECT:** Request for Nonsubstantive Change to Individual Information Collection Request under BIAS-NG Generic (OMB Control Number 0970-0502)

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This memo summarizes a nonsubstantive change we would like to make to the approved individual information collection request for Allegheny County under the generic data collection (OMB Number 0970-0502) for ACF's Behavioral Interventions to Advance Self-Sufficiency Next Generation (BIAS-NG) Project.

When this information collection request was submitted and approved, the overarching incentive amount originally approved for this generic clearance was \$20. The overarching generic clearance was subsequently revised and approved with an incentive amount of up to \$40. For the Allegheny County context, the \$20 incentive has not been sufficient to support adequate recruitment in the field to date. For example, in a previous Allegheny site visit, only four respondents out of 13 scheduled completed a client interview, even after several reminder calls. It is likely that \$20 is not enough to offset the costs of doing the interview.

Our study's research questions require that we secure interview participation from respondents with a range of background characteristics, including those that may present challenges to participating in interviews. At minimum, clients are parents, often with young children, which means that they may have to pay out-of-pocket for child care during the time of completing the interview and getting to and from it. For the respondents in Allegheny, the costs of an interview entail making an extra trip to either the child welfare office or to a separate location; that is, unlike other contexts, clients are not recruited and interviewed on-site after attending a meeting or a prior appointment with their caseworker, thus involving transportation costs solely associated with the interview. With OIRA's approval, we hope that increasing the incentive amount will offset barriers participation and help this site secure a complete and timely data collection.

We have revised Supporting Statement A, Supporting Statement B, and Appendix B to reflect this change as well.