

SUPPORTING STATEMENT Part A
FOR PAPERWORK REDUCTION ACT SUBMISSION

IMPACT OF COVID-19 ON ADULT PROTECTIVE SERVICE PROGRAMS

A. Justification

1. *Explain the circumstances that make the collection of information necessary.*

The Administration for Community Living (ACL) requests emergency clearance approval to collect data for a study on the impact of COVID-19 on Adult Protective Service (APS) Programs (OMB 0985-New). ACL seeks approval from OMB under the Paperwork Reduction Act (PRA) section 1320.13(i)(iii); due to an unanticipated event, the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of this vital time-sensitive information.

Due to the recent COVID-19, pandemic ACL requests OMB emergency approval to collect data using an online survey. This study's collection of information is essential to the mission of ACL. This study needs to occur now during the COVID-19 pandemic to explore both challenges and successes and with the goal of developing a resource of information to assist APS programs in responding to ongoing and future outbreaks or similar emergencies. For this reason, ACL cannot reasonably comply with the normal PRA clearance procedures and requests a waiver of public comment to expedite online distribution of the data collection activity on July 20, 2020.

This data collection is new and will investigate the impact of COVID-19 on APS programs across the country. The COVID-19 pandemic is causing changes in APS policy and practice in several areas, including, but not limited to, a reduction of in-person interactions with clients, perpetrators, and collaterals. As the COVID-19 pandemic continues and is predicted to return in waves, it is critical to understand the effectiveness of APS policy and practice changes and preparedness for such emergencies. Findings will be shared with APS programs so that knowledge and effective strategies are shared and applied to current and future challenges.

The study objectives are to examine COVID-19's impact on:

Work and Workload: Determine the short-term impact of COVID-19 on program work and workload as measured by the impact on the number and types of cases, workload, and outcomes.

Policy and Practice: Identify, categorize and analyze the impact of policy and practice changes implemented because of COVID-19 and document what changes were considered successful and not successful. Specifically, identify the issues that are arising from the policy and practice changes and document how APS staff have addressed them.

Effect on Staff: Identify the impact on staff in areas such as job satisfaction, job readiness, and safety and determine how to reduce the negative impacts during future emergencies.

Partnerships: Identify the impact of COVID-19 on relationships between APS and its community partners (e.g., law enforcement, healthcare, mental health) and determine how those relationships can be improved on an ongoing basis and in preparation for the next emergency. In addition, identify any new or pronounced partnerships, such as social services, and how these relationships can be better prepared or established during times of emergency.

Preparedness Plans: Identify the impact of COVID-19 on the emergency preparedness plans of APS programs and determine how those plans can be improved, particularly in preparation for the next emergency.

2. *Indicate how, by whom, and for what purpose the information is to be used*

Findings from this important and time-sensitive study will improve APS response during disasters. Findings will be distributed via the APS-TARC website, a technical assistance resource center for APS programs. ACL will also explore other opportunities where findings can be shared via blogs, briefs, conference presentations and webinars.

3. *Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or forms of information technology.*

An online survey will be used to collect data. Online surveys have many advantages to mail surveys, computer assisted telephone surveys, or paper surveys completed in person/with assistance. Online surveys are highly efficient both in completion time for the respondent and will feature skip patterns so respondent can easily go through applicable questions. A response is also required before moving to the next question in order to reduce the amount of missing data and error in respondents completing the survey without assistance. The online survey will be best suited to our target population who are professionals with regular access to the internet and are computer literate. Our study population will be able to receive the survey invitations via e-mail and be able to access the survey at the same time.

4. *Describe efforts to identify duplication.*

There have been no other national studies conducted on the effects of COVID-19 on APS.

5. *If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.*

No small businesses or other small entities will be involved in this study.

6. *Describe the consequences to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.*

Respondents will respond to the data collection one time only. Information from this study will likely benefit and affect policy-making to improve APS programs under emergencies. As the COVID-19 pandemic continues, it is critical to understand the effectiveness of APS policy, practice changes and preparedness for such pandemic or other emergencies. Without conducting this study, ACL may not collect necessary data to share with APS programs any knowledge and effective strategies to apply to current and future emergencies.

7. *Explain any special circumstances that would cause an information collection to be conducted in a manner:*

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document;*
- *requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results than can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or*
- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

This information collection fully complies with 5CFR 1320.5, there are no special circumstances.

8. *As applicable, state that the Department has published the 60 and 30 Federal Register notices as required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instruction and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.*

ACL has requested emergency clearance under 1320.13 with a waiver of public comment.

In late March 2020, the study team consulted with five APS State directors whose states were most affected by COVID-19 to discuss the relevancy and feasibility of the data collection during these times as well as data collection strategies and methods to minimize burden. These directors gave their support for the study and provided guidance on study questions and how to get optimal response rates. Directors discussed the issues, challenges and successes of their experiences with COVID-19. Directors also suggested that the surveys should be addressed to them and they could best identify who would complete the survey and ensure completion. They also suggested that the survey should take no more than 20-25 minutes to complete. In June 2020, when the study design was approved and the survey was drafted, the study team further discussed the experiences of APS programs with eight additional states and also shared the online and MSWord version of the survey with four APS state directors to review for readability, accuracy, and ease. The study team ensured that the experiences of the state APS programs interviewed were reflected in the survey questions and response options as well as the logistics and implementation recommendations to ensure optimal response rates.

9. *Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees with meaningful justification.*

Respondents will not receive any remuneration for participating in the online survey.

10. *Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy*

Personally identifiable information (PII) is not being collected as part of the study and we make no pledge about the confidentiality of the data. However, the survey includes an informed consent process. Given that the survey is brief and completed anonymously, the informed consent process for this instrument is built into the instructions. The study team will protect the privacy of all participants. Data that the research team collects will be password-protected and known only to the research team. Participants will not be identified in any reports and nothing they say will be personally attributed to them or their APS programs. Survey data will be collected via an electronic data collection (Qualtrics). IP Addresses will not be collected, as this feature will be disabled within Qualtrics.

The VA Tech and WRMA Institutional Review Boards (IRB) have determined that the study is exempt from full IRB review, since the survey does not involve human subjects and no individual level data.

11. *Provide additional justification for any questions of a sensitive nature.*

There are no questions of a sensitive nature collected in the survey. No client-level identifying data will be collected for the study.

12. *Provide estimates of the hour burden of the collection of information. The statement should:*

The burden estimate below in Table 1 provides the average time per response to complete the survey. ACL calculated this burden estimate from four state administrators during the online survey pilot. The average time for survey completion estimates at approximately 20 minutes with 50 state administrators.

Table 1. Estimated Annualized Burden Hours

Form Name	Number of Respondents	Number of Responses per Respondent	Total Responses	Average Burden per Response (in minutes)	Total Burden Hours
National Online Survey for APS Administrators	50	1	50	.33	16.5

The estimated annualized burden costs in Table 2 below was developed using the Bureau of Labor Statistics to determine salaries for each respondent. The salary estimate used is \$45.23 including wage, overhead and fringe benefits under the management occupation category for local governments at \$90.46 per hour for a total respondent cost of \$1492.59.

<https://www.bls.gov/oes/current/oes110000.htm>

Table 2. Estimated Annualized Burden Costs

Form Name	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
National Online Survey for APS	16.5	\$90.46	\$1492.59

13. Provide an estimate of the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Questions 12 and 14.)

There are no direct costs to respondents other than their time in participating in the survey.

14. Provide estimates of annualized cost to the Federal government.

The total cost to the government is **\$143,176.80** calculated from the following:

There is one ACL staff member GS-14, based on the project schedule below federal oversight and review equates to 30 hours. From the 2020 OPM salary and wages at a hourly rate of \$58.13, adding in 100% overhead and fringe benefit at \$116.26 totals \$3,487.8.

ACL contracted WRMA, Inc. to conduct the study for a total of \$139,689, including labor, subcontract with VA Tech, and other operational costs.

Table 3. Estimated Annualized Costs to the Federal Government

Data Collection Activity	Total Burden Hours	Hourly Wage Rate	Total Federal Government Costs
National Online Survey for APS	30	\$116.26	\$3,487.80
WRMA Contract			\$139,689
TOTAL			\$143,176.80

15. Explain the reasons for any program changes or adjustments.

This is a new information collection; there is a program change increase of 16.5 annual burden hours.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used.

The survey will be launched in July and August 2020 for 3 weeks. Analysis of the survey will shortly follow and will involve descriptive statistics and regression analysis. A summary report will be approved by ACL before publication on the APS-TARC website.

Additional dissemination of findings will be explored with the interest of getting the information to APS programs as widely and effectively as possible. Below is a table of target dates.

Table 4. Tabulation and Publications

Survey Launch	July 20 – August 7, 2020
Data Analysis	August 10 – 21, 2020
Final Summary of Survey Findings to ACL for publication on APS-TARC website	August 31, 2020
Possible dissemination of findings via webinars, blogs, briefs, conference presentation, etc.	After September 1, 2020

17. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Below is the estimated timeline for the study.

Study design by ACL	(May 21, 2020)
Phase 1 State-Level Informational interviews with 9 State APS to inform survey	May 22 – July 24, 2020
Final Summary of Interviews Findings	July 24, 2020
Phase 2 State-Level Online Survey	
<i>VA Tech IRB approval for survey</i>	<i>June 29, 2020</i>
<i>OMB emergency approval</i>	<i>June 29 – July 10, 2020</i>
Survey Launch	July 20 – August 7, 2020
Data Analysis	August 10 – 21, 2020
Final Summary of Survey Findings to ACL for publication on APS-TARC website	August 31, 2020
Possible dissemination of findings via webinars, blogs, briefs, conference presentation, etc.	After September 1, 2020
Phase 3 Local Focus Groups with 9 APS Programs	August 3 - 28, 2020
M. Final Summary of Focus Group Findings	September 18, 2020
Final summary and recommendations, including methodology	September 18, 2020

18. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date for OMB approval of the information collection will be displayed on the survey.