

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

**From:** Katie Pahigiannis and Kriti Jain  
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Administration for Children and Families (ACF)

**Date:** April 17, 2020

**Subject:** Non-Substantive Change Request – Strengthening the Implementation of Responsible Fatherhood Programs (SIRF) (OMB #0970-0356)

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This memo requests approval of non-substantive changes to the approved information collection, Strengthening the Implementation of Responsible Fatherhood Programs (SIRF) (OMB #0970-0356, Formative Data Collections for ACF Research)

### ***Background***

Data collection for the first phase of SIRF – approved as a generic information collection under the Formative Data Collections for ACF Research - includes outreach to fatherhood programs and stakeholders (including relevant national, state and local level researchers, technical assistance providers, curriculum developers, program funders, community leaders) to collect information about implementation challenges programs face as well as potential solutions. The discussions were to first occur through one-hour telephone or video conference calls with program staff from up to 25 programs. With a select group of approximately 16 programs, the study team was approved to conduct follow-up in-person visits to organizations. The goal of the in-person visits were to have further discussions with program staff, program participants (fathers), observe program activities, and have a group brainstorm exercise. Since OMB approval in February 2020, all initial phone calls with program staff have been completed. However, in response to the COVID-19 pandemic and the resulting travel and shelter-in-place advisories, the plan for in-person visits is being revised.

### ***Overview of Requested Changes***

The study team proposes the following updates:

- While the travel and shelter-in-place advisories remain in effect, the study team will conduct planned in-person site visits over the phone or video conference with program staff and if possible, with program participants.
- Include a probe in Instrument 3 about challenges brought on by COVID-19 and how programs are addressing them. The information gained from this question relate to the overall goals of SIRF and it is an important opportunity to understand how programs are adapting during the pandemic.

These changes do not impact the estimated average time to complete the data collections and we are confident that the changes will still allow us to meet study objectives, although we do acknowledge some limitations.

- First, locating or scheduling phone calls with program participants could be difficult given data plan or cellphone plan limits.
- Secondly, program staff may have new or reduced schedules or COVID-19 related emergencies to attend to that limit the opportunity for a SIRC phone call. This is understandable given the current economic, family and child well-being challenges low-income families face in the wake of COVID-19.<sup>i</sup>
- Finally, while the travel and shelter-in-place advisories remain in effect, the study team will not conduct observations of program activities, as previously planned. Observations would not have required any involvement from staff and would not have imposed burden but would have provided the study team with insight into how programs operate in practice and the strengths and potential areas of improvement for the program.

Despite these limitations, we believe we can collect much of the information we would have collected from visiting the programs, particularly information about challenges faced by the programs and solutions they have tried or considered, and still address the goals and objectives of the study.

### ***Time Sensitivities***

The end of ACF's current Responsible Fatherhood grant cohort is in September 2020. The data collection activities described in this request aim to be completed before the grant period ends.

<sup>i</sup> Vesoulis, A. (2020, March 11). Coronavirus May Disproportionately Hurt the Poor—And That's Bad for Everyone. TIME. Retrieved from <https://time.com/5800930/how-coronavirus-will-hurt-the-poor/>