

Formative Data Collections for ACF Research

**OMB Information Collection Request
0970 - 0356**

Supporting Statement

Part A

**March 2018
Updated June 2018
Updated October 2020**

Submitted By:
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Administration for Children and Families
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- The goal of this generic ICR is to conduct formative studies to inform ACF research and evaluation.
- The intended use of the resulting data is to improve internal decisions regarding ACF's research, and evaluation. We may share information resulting from these data collections in the following ways:
 - Research design documents or reports; research or technical assistance plans; background materials for technical workgroups; concept maps, process maps, or conceptual frameworks; contextualization of research findings from a follow-up data collection that has full PRA approval; or informational reports to TA providers . In sharing findings, we will describe the study methods and limitations with regard to generalizability and as a basis for policy.
- These formative studies will collect data using well-established methodologies, including: semi-structured and in-depth qualitative interviews; focus groups; direct observations; document analysis; and structured surveys.
- The populations to be studied include key stakeholder groups involved in ACF projects and programs, state or local government officials, service providers, participants in ACF programs or similar comparison groups, experts in fields pertaining to ACF research and programs, or others involved in conducting ACF research or evaluation projects.
- Data will be analyzed using well-established qualitative analysis methods, such as coding interviews for themes. Structured response surveys will be analyzed using descriptive statistics and other appropriate statistical methods.

Overview of change request: The Formative Data Collections for ACF Research generic was created to allow ACF to conduct a variety of formative data collections to inform future research and evaluation activities. ACF has used this umbrella generic clearance since 2008 and has found it very useful to inform research, evaluation, and technical assistance efforts. The current approval for this overarching generic expires in June 2021 but ACF has reached the previously approved burden estimates faster than anticipated. This is due to the usefulness of this tool in general, expanding ACF research and evaluation portfolio, and the unforeseen and unprecedented situation created by the COVID-19 pandemic. The overarching generic has allowed project teams to collect information to inform research plans during the pandemic, which has been incredibly useful.

ACF is currently in the process of submitting a request to revise and extend data collection under this generic clearance. The 60-day comment period related to this revision request will begin on November 3, 2020 and we intend to submit the request for the revision as soon as possible once the initial comment period is complete and any comments have been addressed, as needed. Until that time, however, we would like the opportunity to continue some generic information collections that were already in development and we intended to submit within the next couple months. For that reason, we are currently requesting a nonsubstantive change for a minor burden increase.

A1. Necessity for the Data Collection

The Office of Planning, Research, and Evaluation (OPRE), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), seeks renewal of this generic clearance to allow ACF to conduct a variety of formative data collections. We anticipate the majority of data collections that fall under this generic request to come from OPRE, but program offices will also have access to this resource when they are pursuing research and evaluation. All proposed collections will be reviewed by and submitted through OPRE.

ACF programs promote the economic and social well-being of families, children, individuals and communities. OPRE studies ACF programs, and the populations they serve, through rigorous research and evaluation projects. These include evaluations of existing programs, evaluations of innovative approaches to helping low income children and families, research syntheses, and descriptive and exploratory studies. OPRE’s research offers further understanding of current programs and service populations, explores options for program improvement, and assesses alternative policy and program designs. OPRE anticipates undertaking a variety of new research projects related to welfare, employment and self-sufficiency, Head Start, child care, healthy marriage and responsible fatherhood, family and youth services, home visiting, child welfare, and other areas of interest to ACF. Some ACF program offices conduct their own research and evaluation projects.

Under this generic clearance, ACF would engage in a variety of formative data collections with researchers, practitioners, TA providers, service providers and potential participants throughout the field to fulfill the following goals: (1) inform the development of ACF research, (2) maintain a research agenda that is rigorous and relevant, (3) ensure that research products are as current as possible and (4) inform the provision of technical assistance. ACF envisions using a variety of techniques including semi-structured discussions, focus groups, surveys, and telephone or in-person interviews, in order to reach these goals.

Under this generic clearance, ACF seeks continued approval to collect information from more than 9 respondents that can inform and support future and current research but that are not highly systematic or intended to be statistically representative or otherwise generalizable. The general methods proposed for coverage by this clearance are described in this justification package. Also outlined are the proposed procedures for keeping OMB informed about the various types of data collections, and the nature of the research activities being conducted.

Study Background

This generic clearance (0970-0356) was originally approved for use in October 2008 and renewed in January 2012, March 2015, and June 2018. The following table outlines the number of respondents and burden hours used.

Time Period	Number of	Responses	Burden Hours
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	Packages Approved		
October 2008- October 2011	4	214	360
January 2012- January 2015	4	1121	1417
March 2015- March 2018	18	1992	3076
June 2018-October 2020	26	2714	5267

The increased use of this generic clearance over time is indicative of how beneficial the formative information collection process has been to informing ACF’s work.

Following standard Office of Management and Budget (OMB) requirements, ACF has and will continue to submit to OMB information about individual information collection activities proposed under the generic clearance. ACF/OPRE will provide OMB with a copy of the individual instruments or questionnaires, as well as other materials describing the project. See [Reginfo.gov \(https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0356\)](https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0356) for examples of instruments previously approved under this generic clearance.

Legal or Administrative Requirements that Necessitate the Collection

ACF proposes these information collections at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach

All of the methods and the data collections approved under this clearance will be used for the purposes of informing OPRE’s and ACF’s internal decision-making, technical assistance, research planning, and contextualization of research findings. These formative information collections help ensure ACF develops and implements necessary and effective research and evaluation studies.

Under this umbrella generic information collection request, information will not be collected with the primary purpose of publication, but findings are meant to inform ACF activities and may be incorporated into documents or presentations that are made public. See section A16 for additional information.

The specific types of information gathering methods included under the umbrella of this clearance are varied. ACF will submit individual GenIC requests under this clearance, which will include:

- A full Supporting Statement A and Supporting Statement B, to include the following:

- Intended use of the information collection
- Demonstration of the fitness of purpose between the proposed collection and its intended use
- Specific population of focus
- Contextual information about the study, including any potential barriers or facilitators.
- Description of the qualitative analytic method(s) used including the strengths and limitations of the method(s) for the purpose of the study.
- Information about how outcomes will be communicated and shared.
- Notification that the data collection is for internal program purposes only; it is not meant to provide policy recommendations and the findings are not meant to be generalizable. Any plans for sharing information (as described in A16) will be clearly detailed.
- All instruments, protocols, and other supplementary materials.

ACF understands that OMB will make every effort to review materials for individual generic information collection requests ***within 10 working days*** of submission.

ACF will make separate submissions for clearance of full, non-developmental data collection efforts.

ACF will provide a report summarizing the number of hours used, as well as the nature and results of the activities completed under this clearance with subsequent overarching generic information collection renewals. Attachment A provides an overview of ACF/OPRE's use of this generic information collection between March 2015 and the submission date of this renewal request.

Study Design and Universe of Data Collection Efforts

Under this clearance, ACF will use a variety of approaches. The exact data collection methods and the samples for each GenIC will depend on the project. The particular samples will vary based on the content of the discussion and the programs or policies of interest. These formative studies will collect data using well-established methodologies, including:

- **Semi-structured discussions or conference calls:** Semi-structured discussions or conference calls with multiple participants are conversations between researchers and one or more informants around a series of topics, potentially including probing questions and follow-up questions. Unlike a structured survey, where the interview follows a prescribed set of questions or a script, semi-structured discussions are designed to be more flexible and responsive to the direction of the conversations prompted by the respondent's comments. Semi-structured discussions are useful because they allow for an interactive approach to information gathering, while maintaining some consistency across respondents.

- **Focus groups:** This method involves group sessions guided by a moderator who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups can be more efficient than individual interviews, since multiple individuals participate at one time. In addition, the group dynamics can yield richer responses than individual interviews for some types of topics.
- **Telephone or in-person interviews:** Interviews are one of the oldest and most widely used methods of data collection. Typically structured around a prescribed set of questions, interviews can be done over the phone or face-to-face. With technological advances, telephone interviews have become an efficient source of systematic data collection.
- **Questionnaires/Surveys:** Questionnaires are common and popular tools to gather data from multiple people. Information from a questionnaire can inform research and evaluation planning. Questionnaires may be used to gather information about specific programs or populations served by ACF (i.e., program processes, needs assessments, cost workbooks, etc.).
- **Direct Observation:** Direct observation yields detailed descriptions of the activities, actions, and behaviors of individuals; interpersonal interactions; settings; and organizational processes and procedures. Unless observation includes direct involvement from the observed individuals, these activities will be described in the justification package but will not be included in the estimated burden for a GenIC¹.
- **Document analysis:** Document analysis is often conducted to understand contextual information. Document analysis may include, but is not limited to, organizational or programmatic records, grantee applications, progress reports, and public reports and records. If documents or records are requested in a format in which they already exist, these activities will be described in the justification package, but will not be included in the estimated burden for a GenIC.

Respondents could include key stakeholder groups involved in ACF projects and programs, state or local government officials, service providers, participants in ACF programs or similar comparison groups; experts in fields pertaining to ACF research and programs, or others involved in conducting ACF research or evaluation projects.

¹ Per 44 USC, 5 CFR 1320.3: Definitions: ... **“Information” does not generally include items in the following categories...**(3) Facts or opinions obtained through **direct observation** by an employee or agent of the sponsoring agency or through nonstandardized oral communication in connection with such direct observations. . . .” (emphasis added).

See Reginfo.gov (<https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0356>) for examples of instruments previously approved under this generic clearance.

A3. Improved Information Technology to Reduce Burden

ACF and its contractors will employ information technology as appropriate to reduce the burden of respondents who agree to participate. We will provide specific information about the use of technology for each individual GenIC.

A4. Efforts to Identify Duplication

This research will not duplicate any other work being done by ACF. ACF program offices collaborate regularly and will continue to collaborate to prevent any duplication of information collection efforts. The purpose of this clearance is to better inform and improve the quality of ACF's research and evaluation. Data gathering under this request would not be feasible without this generic clearance due to the time constraints of seeking clearance for each individual data collection. To the maximum extent possible, we will make use of existing data sources before we attempt to utilize the additional field work sought under this clearance. These efforts will be described in each individual GenIC.

A5. Involvement of Small Organizations

The research to be completed under this clearance is not expected to impact small businesses. If an individual collection involves small organizations, the justification package will include a discussion to address this involvement.

A6. Consequences of Less Frequent Data Collection

ACF anticipates that all of the information collected under this generic clearance will involve a one-time data collection. If this project were not carried out, the quality of the research and its relevance to public policy and practitioner concerns among a variety of projects would likely suffer.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on October 11, 2017, Volume 82, Number 195, page 47212, and provided a sixty-day period for public comment. A copy of this notice is attached as Attachment B. During the notice and comment period, no substantive comments were received.

ACF is currently in the process of submitting a request to revise and extend data collection under this generic clearance. The 60-day comment period related to this revision request will begin on November 3, 2020 and we intend to submit the request for the revision as soon as possible once the initial comment period is complete and any comments have been addressed, as needed.

Consultation with Experts Outside of the Study

Based on consultation with ACF staff during the 60-day comment period, we increased the burden estimates from what was estimated in the 60-day Federal Register Notice to account for increased interest from ACF program offices.

Consultation with staff from ACF contractors carrying out research and evaluation surveys will occur in preparation for and in conjunction with the fielding of the data collections under this request. Relevant information about consultations will be included with each GenIC request.

A9. Incentives for Respondents

Per OMB guidance, incentives are generally not appropriate for contractors, cooperators, grantees or program participants because they already have a pre-existing relationship with the agency. Incentives are most appropriate where participants are being asked to travel to a site to participate in a focus group or cognitive interview. Incentives are generally not appropriate for questionnaires/surveys.

If an incentive is proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual information collection request. Per the Office of Information and Regulatory Affairs, Office of Management and Budget guidance document *Questions and Answers when Designing Surveys for Information Collections* (Updated Oct 2016)², justifications will focus on data quality, burden on the respondent, past experience, improved coverage of specialized respondents, rare groups, or minority populations; reduced survey costs; and/or equity.

Each justification will cite the research literature that demonstrates significant improvements in response rates and non-response bias when applied to similar participants, data collection methods, and data collection contexts. OMB does not consider it appropriate to use private sector market rates as a justification for incentives in government information collections. Where no

² https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/pmc_survey_guidance_2006.pdf

evidence is available, ACF may propose a field test or experiment to evaluate the effects of the incentive.

The following includes expected ceiling amounts for different types of collections:

- Focus groups where participants are expected to travel to a central site: Up to \$75
- Cognitive Interviews or similar exercises (intensive one-on-one probing of basis for thoughts) in which participants are expected to travel to a central site: Up to \$40
- Questionnaires/Surveys: TBD, under special circumstances

For any collection over 90 minutes, participants may be offered an incentive to account for incidental expenses (transportation, child care, lost wages, etc.).

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

Individual statements will be included with each generic information collection request submitted under this clearance, but in general, the contractor performing the data collection shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. Any specific pledges evaluation staff must sign, as required by the contractor, will be described in individual GenIC requests.

As necessary, the Contractor shall use Federal Information Processing Standard (currently, FIPS 140-2) compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information that ensures secure storage and limits on access.

Information will not be maintained in a paper or electronic system from which they are actually or directly retrieved by an individuals' personal identifier.

A11. Sensitive Questions

Most of the questions that will be included in these activities will not be of a sensitive nature. However, it is possible that some potentially sensitive questions may be included under this clearance. For proposed collections that include questions of a sensitive nature, ACF will provide a full explanation when submitting an individual GenIC request.

A12. Estimation of Information Collection Burden

Previously Approved Information Collections

The last revision of the generic clearance for formative data collection was approved for 5,375 burden hours over three years. Since approval, 26 GenICs have been approved, using the full amount of burden previously estimated.

Previously Approved Burden

Instrument Type	Estimated Total Number of Respondents	Estimated Number of Responses Per Respondent	Average Burden Hours Per Response	Estimated Total Burden Hours	Average Hourly Wage	Cost per respondent
Semi-Structured Discussions and Focus Groups	2000	1	2	4000	\$29.15	\$116,600
Interviews	1000	1	1	1000	\$29.15	\$29,150
Questionnaires/Surveys	750	1	.5	375	\$29.15	\$10,931
Total				5,375		\$156,681

Newly Requested Information Collections

This nonsubstantive change request is to provide a minimal increase to the burden under this umbrella generic until a full revision request can be finalized. The full revision request is current in process and scheduled to publish on November 3, 2020. For this nonsubstantive change, we are requesting an interim increase in burden of 1,300 hours. This amount is based on ACF's plans for submissions under this generic clearance through January 2021.

Total New Burden Requested Under this NonSubstantive Change Request

Instrument Type	Estimated Total Number of	Estimated Number of Responses	Average Burden Hours	Estimated Total Burden	Average Hourly Wage	Cost per respondent
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	Respondents	Per Respondent	Per Response	Hours		
Semi-Structured Discussions and Focus Groups	188	1	7	1300	\$29.15	\$37,895
Total				1300		\$37,895

Total Burden Requested Under this Information Collection

The total new (188 respondents; 1300 hours) and previously approved (3750 respondents; 5,375 hours) burden hours requested under this umbrella generic information collection is 6,675 hours.

Total Annual Cost

To calculate the annualized cost to respondents for the hour burden, we assume that the typical respondent will be social scientists, other recognized national experts, state or local government officials or service providers. Based on data on our expected respondents from the Bureau of Labor Statistics, we use a mean hourly wage of \$29.15³.

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

We estimate cost to the Federal Government based on costs incurred between March 2015 and submission of this current request.

Based on previous costs, we estimate the annual costs to the Federal Government to average around \$100,000 per GenIC. Costs will be covered by the individual research and evaluation projects, from their data collection budgets. These costs will be described in individual GenIC requests.

A15. Change in Burden

The current approval for this overarching generic expires in June 2021 but ACF has reached the previously approved burden estimates faster than anticipated. This is due to the usefulness of this tool in general, expanding ACF research and evaluation portfolio, and the unforeseen and unprecedented situation created by the COVID-19 pandemic. The overarching generic has allowed project teams to collect information to inform research plans during the pandemic, which has been incredibly useful.

³ This is an average of the mean hourly wages for social scientists (\$39.13), state government officials (\$28.02), local government officials (\$26.75), and social service occupation (\$22.69).

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A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to continue more or less continuously throughout the duration of the clearance. For each individual GenIC request, we will provide OMB with an overall project schedule. The Agency will develop individual timelines for projects involving generic clearances based on an understanding that OMB/OIRA will *review within 10 working days* of receiving the information collection request.

Under this generic IC, information will not be collected with the primary purpose of publication, but findings are meant to inform ACF activities and may be incorporated into documents or presentations that are made public.

The following are some examples of ways in which we may share information resulting from these data collections: research design documents or reports; research or technical assistance plans; background materials for technical workgroups; concept maps, process maps, or conceptual frameworks; contextualization of research findings from a follow-up data collection that has full PRA approval; or informational reports to TA providers. In sharing findings, we will describe the study methods and limitations with regard to generalizability and as a basis for policy. Any planned uses, including for publication or sharing of information from this IC will be described and submitted for approval in each individual generic information collection (GenIC).

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.