

Formative Data Collections for ACF Program Support

**OMB Information Collection Request
0970 - 0531**

Supporting Statement

Part A

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Overview of change request: The Formative Data Collections for ACF Program Support generic was created to allow Administration for Children and Families (ACF) program offices to learn more about funded program services, including program or grantee processes and needs in an effort to improve ACF decision-making and program support. The generic was approved as a new overarching generic in July 2019. Since this was a new request, burden estimates were a best guess at the time. Since approval, ACF program offices have found the generic to be very useful and there has been a higher than estimated demand to submit generic information collection requests. Some of this high demand is due to the unforeseen and unprecedented situation created by the COVID-19 pandemic. The Formative Data Collections for ACF Program Support generic has proved very useful for program offices to collect formative information about what programs and grantees are doing in response to the pandemic and to identify needs.

Due to the success of this generic mechanism, ACF is revising the package to update the estimated number of respondents. There are no changes to the proposed types of generic information collections (GenICs), the purpose of the GenICs, or the use of information collected.

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), requests approval to continue use of this overarching generic clearance to allow ACF to conduct a variety of formative data collections.

ACF programs promote the economic and social well-being of families, children, individuals and communities. Many ACF program offices need to learn more about funded program services so that an understanding of program or grantee processes and potential for improvements can inform ACF decision-making and program support.

Under this generic clearance, ACF engages in a variety of formative data collections with respondents such as: current or prospective service providers, training or technical assistance (T/TA) providers, grantees, contractors, current and potential participants in ACF programs or similar comparison groups, experts in fields pertaining to ACF programs, key stakeholder groups involved in ACF projects and programs, individuals engaged in program re-design or demonstration development for evaluation, state or local government officials, or others involved in or prospectively involved in ACF programs. The goals of the generic information collections (GenICs) under this approval are to: obtain information about program and grantee processes or needs, and to inform the following example activities, among other activities:

- Delivery of targeted assistance and workflows related to program implementation or the development or refinement of program and grantee processes, and the development and refinement of recordkeeping and communication systems.
 - Example requests could include information collections from grantee staff or program participants regarding current (or planned) grantee processes, with the goal of improving processes or providing assistance based on feedback from respondents.

- Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).
 - Example requests could include T/TA needs assessment questionnaires or surveys; requests to share information about promising strategies or approaches; requests for information from grantees about local evaluation plans for purposes of providing evaluation technical assistance.
- Obtaining grantee or other stakeholder input on the development of program performance measures.
 - Example requests could include focus groups or surveys designed to obtain stakeholder input on perceived usefulness of measures, or cognitive testing of measures.
- Use of rapid-cycle testing activities to strengthen programs in preparation for summative evaluation.
 - Example requests could include data collection from program staff or participants, observation of program activities¹, or review of existing program data.²
- Development of learning agendas and research priorities.
 - Example requests could include focus groups or surveys designed to obtain stakeholder input on priorities for future research, evaluation, and improvement activities aimed at informing learning agendas.

ACF uses a variety of techniques such as semi-structured discussions, focus groups, surveys, templates, open-ended requests, and telephone or in-person interviews, in order to reach these goals.

Under this generic clearance, ACF collects information from more than 9 respondents that can inform the support of ACF programs. These information collections are not highly systematic or intended to be statistically representative or otherwise generalizable. The general methods covered 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.

Legal or Administrative Requirements that Necessitate the Collection

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

¹ 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 GenIC.

² 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.

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 ACF's decision-making around program support. These formative information collections help ensure ACF provides program support effectively and efficiently.

Under this umbrella generic information collection request, findings are meant to inform ACF activities and may be incorporated into documents or presentations that are made public. As appropriate, information may be published for purposes of transparency and in an effort to provide information to stakeholders. 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, if appropriate, a Supporting Statement B³, 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 information collection, including any potential barriers or facilitators.
 - If appropriate for the type of request, a description of the analytic method(s) used including the strengths and limitations of the method(s) for the purpose of the study.
 - Information about how data will be communicated and shared.
 - Notification that the data collection is for internal program purposes only; it is not meant to support 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.

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

³ If no statistical methods and analyses are planned or appropriate for the type of collection (ex. informing T/TA), only a Supporting Statement A will be included with the request.

individual instruments or questionnaires, as well as other materials describing the project. See Reginfo.gov (<https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0531>) for examples of instruments previously approved under this generic clearance.

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. This revision includes this information in Attachment A.

Study Design and Universe of Data Collection Efforts

Under this clearance, ACF uses a variety of approaches. The exact data collection methods and the samples for each GenIC depends on the project. The particular samples vary based on the content of the collection and the programs or policies of interest. These formative studies 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 data collectors and one or more informants around a series of topics, potentially including probing questions and follow-up questions. This may include listening sessions or similar semi-structured discussions during which information is requested. 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 as well as program support. Questionnaires may be used to gather

information about specific programs or populations served by ACF (i.e., program processes, needs assessments, cost workbooks, etc.).

- **Templates:** Templates are generally sample documents that request information in a specific format. This could be used to complete logic models or to collect information to inform technical assistance activities in a standard format.
- **Open-ended requests:** Open-ended requests could include requests for specific information in an unspecified format. For example, a request for specific information that would include instructions and a list of specific items requested, but no specific format specified.
- **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 GenIC⁴.
- **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 current or prospective service providers, training or technical assistance (T/TA) providers, grantees, contractors, current and potential participants in ACF programs or similar comparison groups, experts in fields pertaining to ACF programs, key stakeholder groups involved in ACF projects and programs, individuals engaged in program re-design or demonstration development for evaluation, state or local government officials, or others involved in or prospectively involved in ACF programs.

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

⁴ 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).

This research will not duplicate any other work 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 program support. 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 fieldwork 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 the majority of information collections under this generic clearance will involve a one-time data collection. Rapid-cycle information collections will involve iterative collections in an effort to collect feedback, make changes to processes, and collect information to assess the changes. Less frequent data collection would mean that program support would be less responsive to the needs of ACF programs and clients. Information about the frequency of data collection will be described in each individual GenIC.

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 two notices in the Federal Register announcing the agency's intention to request an OMB review of this information collection request. The first notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. ACF did not receive any substantive comments on the first notice.

Consultation with Experts Outside of the Study

Consultation with staff from ACF contractors carrying out information collections will occur in preparation for and in conjunction with the fielding of the data collections under this request. We

may consult with stakeholders and experts, as appropriate. 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)⁵, 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 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, 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.

⁵ https://obamawhitehouse.archives.gov/sites/default/files/omb/inforeg/pmc_survey_guidance_2006.pdf

Individual statements will be included with each GenIC 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

This generic was originally approved for 8,250 burden hours over the three year clearance period. Due to the success of this generic mechanism, ACF is requesting an increase to the

estimated burden. While completing the process to increase the burden to the necessary scale, ACF submitted a change request for an interim burden increase. This increase was for 1,200 hours. Therefore, the previously approved burden under 0970-0531 was 9,450 hours.

At the time of this submission, 16 GenICs are ongoing, with a total of 9,110 burden hours. See Attachment B for all previously approved, ongoing GenICs. Attachment B provides an overview of ACF/OPRE’s use of this generic information collection since initial approval.

Previously Approved Burden

Original Request

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	4,000	\$20.23	\$80,920.00
Interviews	1000	1	1	1,000	\$20.23	\$20,230.00
Questionnaires/Surveys	1000	1.5 ⁶	.5	750	\$20.23	\$15,172.50
Templates and Open-ended requests	250	1	10	2,500	\$20.23	\$50,575
Total				8,250		\$166,897.50

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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	220	1	3.5	770	\$20.23	\$15,577.10
Questionnaires/Surveys	310	1	1.4	430	\$20.23	\$8,698.90
Total				1,200		\$24,276

Newly Requested Information Collections

The estimated burden for this revision is based on the use since initial approval, and consultation with program office staff as well as research contractors with whom we have partnered. A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are

⁶ We have estimated 1.5 responses to account for rapid cycle testing, which will require multiple responses.

unknown at this time. Based on the use since initial approval, we request an increase in burden level to a total of 20,875 burden hours.

By October 2020, project use of this generic clearance exceeded the originally approved burden estimate. Given the usefulness of this tool, and the demand for use, we propose the following burden estimates for this current revision. These estimates are informed by the types of data collections, number of respondents, and response times since initial approval.

The burden table below is illustrative, based on previous experience. While we will not exceed the total burden cap for this generic (20,875), we may use more or less burden within each instrument type.

Total New Burden Requested Under this Umbrella Generic Information Collection

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	5,000	1	2	10,000	\$24.97	\$249,700
Interviews	2,500	1	1	2,500	\$24.97	\$62,425
Questionnaires/Surveys	2,500	1.5	.5	1,875	\$24.97	\$46,819
Templates and Open-ended requests	650	1	10	6,500	\$24.97	\$162,305
Total				20,875		\$521,249

Total Burden Requested Under this Information Collection

The total new (10,650 respondents; 20,875 hours) and ongoing (9,026 respondents; 9,110 hours) burden hours requested under this umbrella generic information collection is **29,985 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, service providers, grantees, contractors, or ACF program participants. Based on data on our expected respondents from the Bureau of Labor Statistics and the federal minimum wage, we use a mean hourly wage of \$24.97⁷.

A13. Cost Burden to Respondents or Record Keepers

⁷ This is an average of the mean hourly wages for social scientists (\$42.16), state government officials (\$24.82), local government officials (\$26.36), and social service occupation (\$24.27), and program participants (\$7.25).

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

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

ACF reached the initially approved burden estimates for this overarching generic faster than anticipated. This is due to the usefulness of this tool in general, and the unforeseen and unprecedented situation created by the COVID-19 pandemic. The Formative Data Collections for ACF Program Support generic has proved very useful for program offices to collect formative information about what programs and grantees are doing in response to the pandemic and to identify needs. This request is to increase the burden estimates for this overarching generic to allow ACF program offices to continue GenICs under this mechanism.

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 umbrella generic IC, information is meant to inform ACF activities and may be incorporated into documents or presentations that are made public such as through conference presentations, websites, or social media.

The following are some examples of ways in which we may share information resulting from these data collections: technical assistance plans, presentations, infographics, project specific reports, or other documents relevant to stakeholders such as federal leadership and staff, grantees, local implementing agencies, and/or T/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 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.