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Office of Management and Budget (OMB)

**From:** Michael Hayes  
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Administration for Children and Families (ACF)

**Date:** February 24, 2022

**Subject:** NonSubstantive Change Request – Procedural Justice-Informed Alternatives to Contempt Demonstration (PJAC) (OMB #0970-0505)

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This memo requests approval of a nonsubstantive change to the approved information collection, Procedural Justice-Informed Alternatives to Contempt Demonstration (PJAC) (OMB #0970-0505).

### ***Background***

Information collection related to PJAC has been approved in two rounds. The initial package was approved in January 2018, and a revised package was approved in April 2020. Through these requests, the following instruments are currently approved:

- Instrument 1: Staff Data Entry on Participant Baseline Information
- Instrument 2: Study MIS to Track Receipt of Services
- Instrument 3: Staff Interview Topic Guide
- Instrument 4: Noncustodial Parent Participant Interview Protocol
- Instrument 5: Staff Survey
- Instrument 6: Staff Time Study
- Instrument 7: Custodial Parent Interview Protocol

Nonsubstantive change requests were approved in May 2020 to include questions about the COVID-19 pandemic for Instruments 3,4, and 7 and in July 2020 to allow for a web-based administration for Instrument 6.

The COVID-19 pandemic has extended longer than the project team could have anticipated, and as a result ACF would like to make some additional changes to Instruments 4 and 7 to explore the ongoing impact of the COVID-19 pandemic on the child support program and families.

Additionally, during this extended period, federal pandemic relief measures through the CARES Act, such as extended unemployment insurance, the expanded child tax credit, and economic impact payments, affected families with child support orders. An additional round of virtual interviews (Instruments 3, 4, and 7) data collection will allow the research team to learn about how families and child support operations were affected by these relief measures and their expiration. It will also allow the research team to learn about changes brought about by the more recent waves of the virus.

Finally, the team has proposed changes to improve the administration of instruments 4 and 7, based on experiences thus far.

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

We request the following changes to *Instrument 4: Noncustodial Parent Participant Interview Protocol* and *Instrument 7: Custodial Parent Interview Protocol*. The proposed additions provide more granularity and detail about previously approved topics. In addition, we have proposed changes to how some questions are worded so that the instruments better align with the way parents talk about child support policies and practices. These changes draw on the research team's experience fielding the instruments previously.

- We propose adding questions and probes to understand how the COVID-19 crisis continues to affect child support services and payments from the perspective of parents. The proposed changes focus on recent developments in the pandemic that affect child support processes and payments, such as the end of expanded unemployment insurance access under the CARES Act.
- Additionally, drawing from our experience using these instruments in the summer of 2020, we suggest changes to how some questions are worded so that they better align with the way parents talk about child support policies and practices. We also suggest probes on information about court and enforcement processes to more routinely collect information volunteered by some interviewees.
- The estimated average time to complete these interviews will remain the same.

We request an additional round of virtual data collection for *Instrument 3: Staff Interview Topic Guide*, *Instrument 4: Noncustodial Parent Participant Interview Protocol*, and *Instrument 7: Custodial Parent Interview Protocol* in order to learn about the ongoing effects of the pandemic. No changes are proposed to Instrument 3. Fewer interviews were conducted in the initial rounds of data collection than anticipated. As a result, the total number of respondents will still be within the scope of the original request, and the total burden associated with these instruments is unchanged.

### ***Time Sensitivities***

Instruments 3, 4, and 7 are scheduled to begin fielding in March 2022. We request approval of these changes as soon as possible.