ACF Data Governance Consulting & Support Project

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A

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Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a generic information collection under the umbrella generic, Formative Data Collections for Program Support (0970-0531).

- **Description of Request:** This request is to conduct interviews with technical assistance (TA) center directors, federal and philanthropic funders of TA centers, TA leads/specialists, and TA recipients as part of an environmental scan and needs assessment to examine the current state of the field of TA supporting states, localities, and Tribes interested in the development and use of administrative data linking and integrated data systems for research purposes. The review will identify areas of strength in current efforts as well as areas of opportunity and unmet need. The ultimate purpose is to produce a series of options to guide the Administration for Children and Families Office of Planning, Research and Evaluation (OPRE) to enhance the quality, completeness, and coordination of such technical assistance. Additionally, states, localities, and Tribes could use the results to better understand the potential supports they could leverage as they link or integrate data for research purposes. These data are not intended to be generalized to a broader population. We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** Interviews for the environmental scan with TA center directors and TA funders are scheduled to take place in August 2021, and the interviews for the needs assessment with TA leads/specialists and TA recipients are scheduled to take place in September 2021.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

A1. Necessity for Collection

H.R. 4174 – Foundations for Evidence-Based Policymaking Act of 2018 ("the Evidence Act") necessitates this information collection (https://www.congress.gov/bill/115th-congress/house-bill/4174/text). The Evidence Act requires that the U.S. Department of Health and Human Services (HHS) identify opportunities to increase staff data skills. More specifically, HHS is required to perform an assessment of current staff data literacy and data skills and conduct a gap analysis between the current staff's skills and the skills the agency requires (Federal Data Strategy 2020 Action Plan, https://strategy.data.gov/assets/docs/2020-federal-data-strategy-action-plan.pdf, p. 26).

The Administration for Children and Families (ACF) Office of Planning, Research and Evaluation (OPRE) has contracted with SRI Education to fulfill this requirement. Specifically, SRI will conduct interviews with technical assistance (TA) center directors, federal and philanthropic funders of TA centers, TA leads/specialists, and TA recipients as part of an environmental scan and needs assessment to examine the current state of the field of TA supporting states, localities, and Tribes interested in the development and use of administrative data linking and integrated data systems (IDS) for research purposes.

A2. Purpose

Purpose and Use

This proposed information collection meets the following goal of ACF's generic clearance for formative data collections for program support (0970-0531):

- Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker, and is not expected to meet the threshold of influential or highly influential scientific information.

The purpose of the formative data collection for program support is to inform ACF/OPRE about the state of the field's use of administrative data linking and integrated data systems (IDS) for research purposes to produce a series of options to guide OPRE to enhance the quality, completeness, and coordination of TA related to data linkage and integration for research purposes. Additionally, the results can be shared with the field (state, local, and Tribes) for their use in understanding what supports are available as they work to better integrate or link data for research purposes.

Guiding Questions

1. Which organizations currently support data integration, linkage, and sharing for research and statistical purposes?
   a. How are they funded and what resources have they created that could be used to support state, local, and Tribal public agencies?
   b. What are their substantive and technical areas of focus (i.e., early education, employment, etc.)?
   c. What do the organizations do to coordinate with other groups offering TA and support services in this area?

     d.   How might these organizations make themselves more effective and efficient through coordination, collaboration, and cooperation?

2. How are state, local, and Tribal public agencies using IDS to support research?
3. What needs do states, local, and Tribal public agencies have in order to better support using IDS to support research?
4. What TA supports do they currently leverage and what impact has it had?
5. How can the field (i.e., state programs, local programs, and Tribal communities) use existing TA and related supports to support integrated data system use in research?

Study Design

The SRI study team will first conduct an **environmental scan** to understand existing TA supporting states, localities, and Tribes in the development, maintenance, and use of administrative data linking and integrated data systems for statistical/research purposes. The two main components of the environmental scan are 1) a review of publicly available resources/documents (to take place summer 2021 (after study approval)), and 2) interviews with a sample of TA center directors and TA funders (to take place once in August 2021).

The study team will then conduct a **needs assessment** to identify areas of strength and unmet needs with respect to TA for data linkage and integration for statistical/research purposes, and we will interview a sample of TA leads/specialists and TA recipients one time in September 2021 to collect this information. (See Part B1 for information about the appropriateness of the study methods.)

The study team will compare the **findings** from the environmental scan and needs assessment to identify gaps between what supports are available and needed (see Part B1 for more information about how the OPRE Division of Data and Improvement can use this information). A limitation of the study design is that the results are not designed to be representative of or generalizable to a given population. This key limitation will be included in products associated with this study.

Data Collection Activity	Instrument(s)	Respondent, Content, Purpose of Collection	Mode and Duration
Interviews for environmental scan	Instrument 1: Interview protocol for TA center directors	**Respondents**: TA center directors who oversee the provision of TA related to data linkage and integration. **Content**: Interview questions ask about the respondent's roles, who their TA center serves, the types of supports and services their TA center provides related to data linkage and integration, the perceived impact of these supports, TA requests they are unable to meet, how they coordinate and collaborate with other TA centers, and funding. **Purpose**: To learn about existing TA supporting states, localities, and Tribes in the development, maintenance, and use of administrative data linking and integrated data systems for statistical/research purposes.	**Mode**: Virtual interviews conducted via Zoom for Government **Duration**: 1 hour

Interviews for environmental scan	Instrument 2: Interview protocol for TA funders	**Respondents**: Contracting Officer's Representatives (COR) or Federal Program Officers (FPO) for federally funded TA centers or a program officer for a philanthropically funded TA center that focuses on data linkage and integration. **Content**: Interview questions ask about the respondent's roles and responsibilities, the types of TA supports and services they fund, the perceived impact of these funded supports, and how they coordinate and collaborate with other funders to support this work. **Purpose**: To learn about existing TA supporting states, localities, and Tribes in the development, maintenance, and use of administrative data linking and integrated data systems for statistical/research purposes.	**Mode**: Virtual interviews conducted via Zoom for Government **Duration**: 1 hour
Interviews for needs assessment	Instrument 3: Interview protocol for TA leads/specialists	**Respondents**: TA leads/specialists who provide TA services and supports related to data linkage and integration. **Content**: Interview questions ask about the respondent's roles and responsibilities, the needs of their TA recipients, the TA services and supports they provide related to data linkage and integration, the perceived impact of these supports, challenges to providing TA, TA requests they are unable to meet, and how they collaborate with other TA providers. **Purpose**: To identify areas of strength and unmet need with respect to TA for data linkage and integration for statistical/research purposes.	**Mode**: Virtual interviews conducted via Zoom for Government **Duration**: 1 hour
Interviews for needs assessment	Instrument 4: Interview protocol for TA recipients	**Respondents**: TA recipients who use TA services and supports related to data linkage and integration. **Content**: Interview questions ask about the respondent's roles and responsibilities, uses of integrated data systems, challenges with developing and using integrated data systems, TA needs related to data linkage and integration, TA supports they use, the perceived impact of these supports, whether they use multiple TA centers, and unmet TA needs. **Purpose**: To identify areas of strength and unmet need with respect to TA for data linkage and integration for statistical/research purposes.	**Mode**: Virtual interviews conducted via Zoom for Government **Duration**: 1 hour

Other Data Sources and Uses of Information

We will use the interview data in concert with information we collect from a website and document review of publicly available information on TA center websites. Examples of the types of information we will collect include but are not limited to: sponsoring department or agency of the TA center, affiliated program office, overview of TA services and supports, TA topics, tools (e.g., toolkits, checklist, templates), and products (e.g., guides, briefs, reports, case studies). The website and document review is not subject to the Paperwork Reduction Act (PRA).

A3. Use of Information Technology to Reduce Burden

We plan to use Zoom for Government to conduct online interviews with study participants. Conducting virtual interviews at a time convenient for interview respondents can reduce the burden by avoiding the need to spend time traveling to and from a physical interview site. We anticipate that many interview participants will already have experience using conferencing platforms like Zoom; thus, we do not anticipate this will be a barrier to participation. Participants will have the option of turning their video on or off, or they may call in using the phone. The interviews will be recorded, reducing burden on the participant to repeat information.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

While one aspect of the study involves a resource and document review to better understand what TA centers exist that focus on data linkage and integration and the types of resources and supports they offer, it is important to supplement this information with conversations from TA center directors, TA funders, TA leads/specialists, and TA recipients to learn more about what gaps might exist with respect to available resources and needs. To our knowledge, no other studies have conducted an environmental scan or needs assessment focused on TA support for data integration for research purposes by interviewing these types of respondents.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) above and 10 (below)

A8. 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 the overarching generic clearance for formative information collection. The first notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public

comment. The second notice published on December 28, 2020, Volume 85, Number 248, page 84343, and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

Consultation with Experts Outside of the Study

We did not consult with experts outside of the study.

A9.   **Tokens of Appreciation**

We will not be providing tokens of appreciation to interview participants.

A10.   **Privacy: Procedures to protect privacy of information, while maximizing data sharing**

Personally Identifiable Information

Personally Identifiable Information (PII) will be limited to names, email addresses, phone numbers, and job titles and will be used primarily to arrange interviews and track participants' contact information. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

We plan to audio record interviews. A study team member will begin each interview with a reminder to the interview respondent that their participation is voluntary and that they may skip questions as preferred, and they will ask for confirmation that the participant is willing to be interviewed and also audio recorded. Responses to these two questions will be noted at the beginning of the interview form. If the interview respondent does not provide their permission to be audio recorded, we will not record the interview. 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. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information.

Data Security and Monitoring

SRI's Information Security & Technology Risk Management (ISTRM) vets and approves all data systems, issues data handling policy and standards, and provides training and resources to staff. The ISTRM approval process includes ensuring our systems comply with regulations for the Family Educational Rights and Privacy Act (FERPA,) Health Insurance Portability and Accountability Act (HIPAA), Federal Risk and Authorization Management Program (FedRAMP), and Controlled Unclassified Information (CUI).

Staff are required to manage data as stated in SRI's *Handbook for Safeguarding Sensitive Personally Identifiable Information*, which prescribes practices for handling and protecting sensitive PII.

SRI has layered protections in place to protect PII, including specific teams assigned to ensure compliance with various regulations. SRI's Data Security Committee leads ongoing trainings in data security best practices, provides consultation, and supports compliance with contractual and data use agreement requirements. In addition, all research is overseen by SRI's Institutional Review Board (IRB), which ensures compliance with all human subjects' research protections covered by HHS and FERPA including, but not limited to, secure handling of PII. Further, all data transfer, storage, and access processes are strictly permission-limited to the least number of users possible to minimize risk of unauthorized data access. Finally, data including PII are securely deleted at the appropriate time in compliance with data deletion according to the DoD 5220.22-M ECE standard.

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To maintain the Confidentiality, Integrity, and Availability (C-I-A) of data collected in this project, SRI follows its own highly rigorous standards and applicable policies, procedures, and controls required by the HHS Information Security Program. SRI uses state-of-the art software solutions to manage and protect data. SRI uses Office 365 (O365) U.S. Government Community Cloud (GCC) with International Traffic in Arms Regulations (ITAR) support. Office 365 U.S. Government supports the FedRAMP accreditation at a Moderate Impact level. FedRAMP artifacts are available for review by federal customers who are required to comply with FedRAMP. Federal agencies can review these artifacts in support of their review to grant an Authority to Operate (ATO). The O365 w/GCC environment has the control necessary to meet industry and government regulations, such as FERPA and HIPAA.

A11.   **Sensitive Information** [1]

We will not collect sensitive information.

A12.   **Burden**

Explanation of Burden Estimates

Each participant will participate in one interview that will last no longer than 60 minutes.

Estimated Annualized Cost to Respondents

All wage estimates are from the Bureau of Labor Statistics (BLS), https://www.bls.gov/oes/current/oes_nat.htm#00-0000, retrieved on June 4, 2021. The hourly wages of TA center directors and TA funders was derived from BLS occupation code 11-2021 – "General and Operations Managers." The hourly wage for TA leads/specialists was derived from BLS occupation code 11-3131 – "Training and Development Managers." The hourly wage of TA recipients was derived from BLS occupation code 21-1099 – "Community and Social Service Specialists."

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total /Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Instrument 1: Interview protocol for TA center directors	12	1	1	12	$60.45	$725.40
Instrument 2: Interview protocol for TA funders	2	1	1	2	$60.45	$120.90

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[1] Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

Instrument 3: Interview protocol for TA leads/specialists	8	1	1	8	$60.54	$484.32
Instrument 4: Interview protocol for TA recipients	8	1	1	8	$ 23.85	$ 190.80
Total				30		$1,521.42

Note: Federal staff hours are not included in the burden estimate.

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

Cost Category	Estimated Costs
Instrument Development and OMB Clearance	$18,000
Field Work	$314,000
Publications/Dissemination	$24,000
Total/annual costs over the request period	$356,000

A15. Reasons for changes in burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

A16. Timeline

- 1 week after OMB approval – Begin conducting interviews with TA center directors and TA funders for environmental scan (August 2021)
- 1 month after OMB approval – Begin conducting interviews with TA leads/specialists and TA recipients for needs assessment (September 2021)
- Completion of report – March 2022

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: TA Center Director Interview Protocol for Environmental Scan

Instrument 2: TA Funder Interview Protocol for Environmental Scan

Instrument 3: TA Lead-Specialist Interview Protocol for Needs Assessment

Instrument 4: TA Recipient Interview Protocol for Needs Assessment

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Appendix A: Research questions cross-walk

Appendix B: Study recruitment emails