

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

ACF Evidence Capacity Support: Survey of Survivors of Torture Grantees

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A

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Part A

Executive Summary

1. **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).

2. **Description of Request:** The Office of Planning, Research, and Evaluation (OPRE) within the Administration for Children and Families (ACF) at the Department of Health and Human Services (HHS) proposes to conduct an online survey with up to 35 Services for Survivors of Torture (SOT) grantee programs funded by the Office of Refugee Resettlement (ORR). This information collection will be overseen by OPRE and conducted by Mathematica and Child Trends. The purpose of the survey is to learn more about SOT program capacity and perceptions of the current data collection and reporting requirements (including their training and technical assistance needs and recommendations for changes). Findings will be shared with ORR for the purpose of assessing feasibility for future evaluations among SOT programs and determining changes that may be needed for future data collection and reporting requirements.

We do not intend for this information to be used as the principal basis for public policy decisions.

3. **Time Sensitivity:** This request is time sensitive. The study team will need to complete data collection prior to the end of the current SOT funding cycle in September 2022.

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A1. Necessity for Collection

As part of the ACF Evidence Capacity Support project, OPRE and its contractors at Mathematica and Child Trends (hereafter “the study team”) seek to support ORR’s data improvement, training, and technical assistance initiatives related to their SOT programs by:

- Assessing current data collection and reporting capacity and quality among SOT program grantees
- Identifying necessary refinements to performance measures and data collection procedures
- Building the foundation for future evaluation efforts to determine what works in terms of SOT program characteristics and client outcomes

This proposed information collection will build off feedback sessions that were conducted with eight staff members from five SOT programs and clients from two SOT programs.¹ The feedback sessions provided insight on challenges and recommendations staff had for the current data collection and reporting processes. However, because only a small number of programs participated in the feedback sessions, ORR felt it would be important to collect systematic information about these topics from all programs.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose

Purpose and Use

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

- Obtain information about grantee processes and needs
- Inform activities related to program support, such as the refinement of grantee processes, identification of needed assistance, and training and technical assistance needs, and the development of future research and evaluation.

This information collection is meant to provide descriptive information on SOT program staffs’ perceptions of and recommendations for required data collection and reporting as well as program capacity to participate in a future evaluation. Specifically, the purposes of the proposed survey is to collect feedback from SOT program staff to inform the following:

- Refinement of the existing SOT program data collection measures and reporting systems
- Development of responsive training and technical assistance based on current SOT grantee needs
- Future evaluations of client outcomes among SOT programs

The data collected as part of this information collection will be shared with and used by ORR for internal planning purposes. Resulting updates to data collection measures and any future evaluation activities that are subject to PRA will be submitted for review as a separate request.

¹ These activities were not subject to the Paperwork Reduction Act, and therefore did not require OMB review and approval, since they did not involve requesting the same information from more than 9 individuals.

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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.

Guiding Questions

1. How can SOT programs' data collection processes and measures be refined and improved?
2. What are the technical assistance and training needs of SOT grantees?
3. What is the capacity of SOT programs to participate in future evaluations related to client outcomes?

Information Collection Procedures and Processes

The study team aims to answer the guiding questions through a one-time electronic survey to be completed by SOT program staff. Additional information on outreach to program staff is included in Supporting Statement B, Section B4. The survey will be administered through a secure survey software (Alchemer) and each SOT program will be asked to submit one survey response. Programs may need to seek input from multiple program staff to adequately answer all survey questions; we assume up to three staff will contribute at each SOT program.

The purpose of this information collection is to help inform ORR's data improvement initiatives (more specifically, to help refine the existing SOT program data collection measures and reporting systems) and to identify any training or technical assistance needs. Administering a survey will capture the perspectives of program staff collecting and reporting data to ORR; this in turn will help inform ORR's data improvement initiatives in a way that is a relatively low burden for program staff. More detailed information about why a survey is an appropriate mode of data collection for this request is included in Supporting Statement B, section B1.

This information collection is meant to provide descriptive information, not to assess the outcomes of program services. Findings are not intended to be generalizable or representative of other populations.

Exhibit 1. Data collection activities

<i>Data Collection Activity</i>	<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Survey administration	SOT Program Survey	<p>Respondents: Program staff at SOT programs with ORR grants</p> <p>Content: Questions related to SOT program data collection as well as reporting processes and capacity, perceptions of and recommendations to improve current data collection measures and processes, training and technical assistance needs, and capacity to participate in future evaluations.</p> <p>Purpose: To gather information that ORR can use for their data improvement initiatives.</p>	<p>Mode: Secure, online survey platform (Alchemer)</p> <p>Duration: 40 minutes/respondent</p>

Other Data Sources and Uses of Information

None.

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A3. Use of Information Technology to Reduce Burden

The study team will employ information technology as appropriate to reduce the burden of respondents who participate. The survey will be conducted via an online platform, Alchemer, that can be accessed on a computer, phone, or tablet and completed at the convenience of the respondent. Instructions will be provided to respondents at the start of the survey (see Instrument 1. SOT Program Survey).

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

The proposed survey does not duplicate any other data collection being done by ACF. The survey does not duplicate any other data sources.

A5. Impact on Small Businesses

Some of the responding SOT grantee programs may be operated by small non-profit organizations. To reduce burden, the one-time survey can be completed online at the programs' convenience within a one-month timeframe; staff will also be sent a Word version of the survey that they can complete at their own pace before responding to the survey in the online platform, Alchemer.

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. ACF is currently in the process of renewing the overarching generic and published a notice for comments on January 28, 2022. No comments were received during that comment period.

Consultation with Experts

Not applicable.

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A9. Tokens of Appreciation

No tokens of appreciation will be provided for respondents of this information collection.

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

Personally Identifiable Information

The personally identifiable information (PII) collected includes grantee program staff names and email addresses. This information is needed to distribute the survey and follow up with questions related to the survey. The study team has included this information in the introduction text of the survey so all survey respondents are aware that the survey will ask for contact information before they begin the survey. All PII will be collected via Alchemer, a secure online data collection and management platform. Following data collection, PII will be stored on Child Trends' secure server for up to one year. The study team also has included information on how long survey respondents' contact information will be stored in the introduction text of the survey.

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

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

During data collection, all data (including PII) will be stored in Alchemer, a secure, online data collection and management platform. The study team will ensure that all employees who have access to these data are trained on data privacy issues and comply with the above requirements. At the completion of data collection, data will be stored for up to one year on Child Trends' secure drive to which only authorized users have access. The secure drive utilizes Windows Active Directory security groups for access control and utilizes Encrypting File System (EFS) on demand.

A11. Sensitive Information²

² 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);

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The proposed information collection does not request any sensitive information. IRB approval is not needed for this proposed information collection because it is not research (see Attachment A. IRB Determination Letter).

A12. Burden

Explanation of Burden Estimates

The study team anticipates 105 respondents (assuming three staff from each SOT program) will contribute to 35 SOT program surveys. The estimated average time per staff member is about 40 minutes. We expect data collection to take place over about a six month period.

Estimated Annualized Cost to Respondents

There is an estimated annualized cost to respondents of \$2,316.63. The source for the mean hourly wage information for respondents is [Bureau of Labor Statistics, Occupational Employment and Wages, May 2020](#). Burden estimates were calculated assuming the following individuals from each program will contribute to their program’s survey response:

- One program director. Hourly wage for Program Directors is estimated at \$36.13 based on the BLS average earnings for [Social and Community Service Managers](#)
- Two social workers. Hourly wage for Social Workers is estimated at \$31.33 based on the BLS average earnings for [Social Workers, all other](#)

Exhibit 2. Respondent Burden and Cost

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
SOT program survey –Program Director	35	1	0.67	23.45	\$36.13	\$847.25
SOT program survey – Social Worker	70	1	0.67	46.90	\$31.33	\$1,469.38
Total	105	1	0.67	70		\$2,316.63

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The total cost for the data collection activities will be \$13,879. The study team developed these estimates based on hourly estimates for staff contributions, by each subtask listed below:

Cost Category	Estimated Costs
Field Work	\$1,067

immigration/citizenship status.

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Analysis	\$6,466
Final memo	\$6,346
Total costs over the request period	\$13,879

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

2022								
	Jan	Feb	Mar	Apr	May	June	July	Aug
Survey fielding ³ and data analysis								
Draft and finalize results memo for ORR								

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

- Attachment A – IRB Determination Letter
- Attachment B – SOT Survey outreach emails

Instruments

- Instrument 1 – SOT Program Survey

³ The timeline for fielding the survey is pending OMB approval.