To: Jordan Cohen

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

From: Mary Mueggenborg and Laura Hoard

Office of Planning, Research, and Evaluation (OPRE) Administration for Children and Families (ACF)

Date: November 1, 2021

Subject: NonSubstantive Change Request – Building Capacity to Evaluate Child Welfare

Community Collaborations to Strengthen and Preserve Families (CWCC) Cross-Site

Process Evaluation (OMB #0970-0541)

This memo requests approval of nonsubstantive changes to the approved information collection, Building Capacity to Evaluate Child Welfare Community Collaborations to Strengthen and Preserve Families (CWCC) Cross-Site Process Evaluation (OMB #0970-0541).

Background

The Building Capacity to Evaluate Child Welfare Community Collaborations to Strengthen and Preserve Families (CWCC) Cross-Site Process Evaluation is designed to help OPRE and the Children's Bureau (CB) understand how communities come together to develop and implement integrated approaches to preventing child maltreatment. The cross-site evaluation includes documenting project and organizational leadership approaches, service integration and alignment strategies, and recruitment and assessment methods to identify and serve families most in need of prevention services. The study will provide a rich, detailed description of how grantees work to achieve their projects' goals and illuminate challenges and strategies for doing this work.

This study uses three modes of data collection: Document review, Survey, and In-person Site Interviews. In February 2020, OMB approved a new request that included instruments for:

- Recruiting survey sample and fielding a survey, annually; and
- Conducting in-person semi-structured interviews, annually.

In December 2020, OMB approved nonsubstantive changes to protocols aimed at:

- Acknowledging the unforeseen and challenging effects of the COVID-19 pandemic;
- Shifting from in-person to virtual interviews (teleconference); and
- Adding COVID-19-related probes to interview questions about both challenges and strategies.

CWCC grantees are conducting their own local evaluations, and the Cross-Site Process Evaluation study team aims to minimize redundancy between the local and cross-site evaluations. The Cross-Site Process Evaluation study team received a request from CWCC grantees' local evaluators for interview transcripts from the Cross-Site Process Evaluation interviews for the purposes of the local evaluation. While we cannot share transcripts with local

evaluators, it is possible to share individual transcripts with interviewees themselves and they in turn could choose to share their own as they like. Sharing an individual's interview transcript would provide the opportunity to reduce burden on CWCC grantees and their project participants because if the participant then decided to share the transcript with the local evaluator this would reduce redundancy between the CWCC projects' local process study interviews and the CWCC cross-site process evaluation interviews.

Overview of Requested Changes

We request the following nonsubstantive changes:

- Add language in the interview consent script offering respondents the option to receive the transcript of their own cross-site process study interviews, upon request.
- After the interview has been completed, transcribed, and reviewed, CWCC cross-site interviewers will securely share each transcript with the individual interviewed, upon request.

Additional Consent Language and Procedures for Transcript Sharing

With the aim of reducing burden on CWCC grantees and their project participants, we propose to share transcripts of individuals' own interviews with the interviewees. They would then be able to share or not share any part of the interview transcript at their own discretion. We would make this option available to all grantees/interviewees.

• For interviews that have not yet been conducted, we would modify the interview consent language as follows in *Instrument 6: Site Visit Discussion Guide for Project Directors and Leaders from Partner Organizations – Follow-Up Interviews*, and *Instrument 7: Site Visit Discussion Guide for Staff from Lead and Partner Organizations – Follow-Up Interviews* (proposed change underlined):

"Your answers will be kept private to the extent permitted by law. Information you provide will not be shared with other staff at your agency or organization. Only the study team will have access to the information you provide through this interview. Your name will not be listed in any published reports, and comments will not be attributed to you... You may request a transcript of your own interview from your site visit team in order to share your responses with the local evaluator, if you are comfortable, which could reduce time needed during any interviews with them."

Interviewees could request a copy of their transcript during the interview or afterwards via email.

For interviews that have already been conducted and for which we have transcripts, we
would email all previous interviewees with the option to request their transcript, using
this language:

If you would like to receive a transcript of our interview with you that took place on [date], please respond to this email. We will send you the transcript using WinZip encryption and will send a follow-up email with the password.

- In the event that transcripts are requested for an interview that had two interviewees, we will obtain consent to share the transcripts from both interviewees before moving forward with the request. For future interviews, we will avoid conducting interviews with more than one interviewee so that the transcript sharing process is simpler.
- If this plan is approved, we would transmit the requested transcripts via email using WinZip encryption. WinZip supports AES encryption in two different strengths: **128-bit AES** and **256-bit AES**. We would use the 256-bit AES. Practically, this would entail attaching the encrypted transcript to an email to the interviewee and sending a second email with the password required to open the transcript.
- We will not share interview transcripts with evaluators or CWCC grantee leaders or staff (except their own interviews).

Abt's Institutional Review Board (IRB) and Cybersecurity Department have reviewed and approved these procedures.

The attached revised SSA includes pertinent revisions to sections A4 (Efforts to reduce duplication) and A10 (Data Security), and the attached revised SSB includes pertinent revisions to section B7 (Data Handling).

Time Sensitivities

We would like to implement this change as soon as possible because both grantees' local evaluators and the cross-site study team are currently conducting interviews.