

**To:** Jamie Wilson  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Laura Hoard and Wendy DeCoursey  
Office of Planning, Research and Evaluation (OPRE)  
Administration for Children and Families (ACF)

**Date:** September 16, 2022

**Subject:** NonSubstantive Change Request – Study of Disability Services Coordinators and Inclusion in Head Start (OMB #0970-0585)

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This memo requests approval of nonsubstantive changes to the approved information collection, Study of Disability Services Coordinators and Inclusion in Head Start (OMB #0970-0585).

### ***Background***

On January 3, 2022, we received OMB approval for the Study of Disability Services Coordinators and Inclusion in Head Start (OMB #0970-0585), inclusive of two phases of surveys and one phase of interviews. This request focuses on the burden estimates for the survey phases and the study timeline.

### **Burden Estimates**

Analysis of completed Phase 1 and Phase 2 surveys, which have been open for data collection since February 2022 indicate the following:

- **Phase 1 Director’s Survey:** Analysis of completed Phase 1 surveys shows that respondents are taking slightly longer, on average, to complete each survey than was originally estimated. Average time of completion to date for the Phase 1 survey respondents, excluding outliers, is 27 minutes (compared to the 25 minutes originally estimated). (Outliers include respondents who started but did not complete the survey in one sitting). Additionally, the total number of the population of program directors who received the Phase 1 survey is slightly higher than originally estimated. Lastly, based on current response progress, we anticipate that our overall response rate could reach as high as 78% (compared to the 71% we had estimated). The additional responses are a welcome improvement to improve the utility of the data for the government and we propose to update materials to reflect accurate response times and estimated response rates.
- **Phase 2 Disabilities Service Coordinator Survey:** Average time of completion for the Phase 2 survey respondents, excluding outliers, is 56 minutes (compared to the 45 minutes originally estimated). (Outliers include respondents who may have started but not completed the survey in one sitting). Additionally, the average number of Disability Services Coordinators being referred by Directors in Phase 1 is fewer than originally estimated. Therefore, we propose to update materials to reflect accurate response times and estimated number of respondents.

## Study Timeline

Since receiving OMB approval in January 2022 the process for submitting separate Tribal IRB protocols and receiving the necessary approvals has taken longer than anticipated, so both Phase 1 and Phase 2 survey releases have been delayed for this subgroup. We propose to update the study timeline described in Supporting Statement A to reflect these delays. To maximize participation opportunities for these Tribal Head Start programs, and other respondents, we updated the data collection timelines outlined in our Supporting Statement A, to reflect an end to Phase 1 data collection in November 2022, and Phase 2 and Phase 3 data collection in March 2023.

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

### Burden Estimates

We request an increase in the burden estimates for the Phase 1 and Phase 2 Surveys accordingly:

- **Instrument 1. Phase 1 Director's Survey:** We have updated the expected response time from 25 minutes to 27 minutes per response and the estimated number of respondents from 1,264 respondents to 1,424 respondents. Overall, this increases the annual burden associated with the Phase 2 survey from 287 hours to 321 hours.
- **Instrument 2. Phase 2 Disability Services Coordinators Survey:** We have updated the expected response time from 45 minutes to 56 minutes per response and the estimated number of respondents from 1,896 respondents to 1,602 respondents. Overall, this increases the annual burden associated with the Phase 2 survey from 709 hours to 744 hours.

To reflect these changes, we have updated Supporting Statement A and recruitment materials. Supporting Statement B has one corresponding update.

## Study Timeline

We also updated the data collection timeline in Supporting Statement A as follows:

- Phase 1 data collection began in February 2022 and will be fielded over 9 months;
- Phase 2 data collection began in April 2022 and will be fielded over 10 months; and
- Phase 3 data collection began in July 2022 and will be fielded over 7 months.

Changes to the timeline remain within currently approved time period for this study, which has an expiration date of January 31, 2025.

## ***Time Sensitivities***

We request a response as soon as possible so we can continue data collection for this study.