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Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Kim Clum and Jennifer Daniels
Office of Planning, Research and Evaluation (OPRE)
Administration for Children and Families (ACF)

Date: March 30, 2023

Subject: Non-Substantive Change Request – Racial and Ethnic Disparities in Human Services Analysis Execution Project 2.0 (RED-X 2.0) (OMB #0970-0597)

This memo requests approval of non-substantive changes to the approved information collection, Racial and Ethnic Disparities in Human Services Analysis Execution Project 2.0 (RED-X 2.0) (OMB #0970-0597).

Background

Research demonstrates significant differences in experiences of the TANF social service delivery system by race and ethnicity. The purpose of this study is to explore how changes made to respond to the COVID-19 pandemic in one state's Temporary Assistance for Needy Families (TANF) program's policies and service delivery system were experienced by different racial and ethnic groups in that state. The goal is to obtain an in-depth understanding of how TANF participants of different racial and ethnic backgrounds experienced these policy and programmatic changes by comparing those experiences within three purposively selected sites in one state and to assess whether those changes may have helped to ameliorate or potentially created new challenges around program and benefit access for different populations.

Project activities include interviews and focus groups with TANF administrators, staff, community-based organizations, program partners, TANF participants and individuals likely eligible but not receiving TANF.

Due to the uncertainty of the COVID-19 pandemic, our team included the options of both virtual and in-person data collection in our original OMB package, approved in October 2022. The project team's Institutional Review Board (IRB) has recently approved in-person collection with procedures that mitigate the risk of participants contracting COVID-19. The IRB required additional language regarding COVID-19 risk be added to consent forms and outreach materials.

This non-substantive change is intended to ensure participants are fully informed on the risks of in-person participation and the option to participate virtually if desired. It does not alter the purpose of the data collection, nor the expected uses of the data as approved by OMB in October 2022.

Overview of Requested Changes

Changes to the current appendices and attachments have been made in response to the project team planning to conduct the interviews and focus groups in-person. These changes are requested to accommodate in-person data collection, inform potential participants of the potential risk of COVID-19 transmission during in-person data collection, and outline the steps the study team is taking to minimize risk of COVID-19 transmission. **Changes in the appendices are highlighted in yellow.**

We are requesting revisions to the following approved appendices:

1. Recruitment forms (Appendices A - E) have been modified to include a statement that the interviews and focus groups will be conducted in person and that this may increase the risk COVID-19 transmission. It describes the steps the research team will take to mitigate risk. It also includes an option to conduct the interview/focus group virtually.
2. Consent forms (Attachments "Instruments" A - G) have been modified to include a statement about the COVID-19 transmission risks associated with in-person data collection and the steps the research team is taking to mitigate risks. These steps include checking with the participants regarding their preference for the research team to wear masks. The research team will wear masks as participants enter the room and, at the start of the interview, the research team will ask "Would you prefer for us to stay masked during this conversation?" The research team will wear masks if it is desired by the interviewee or any single member of a focus group. The consent forms have been modified to reflect these additional practices. The consent forms have also been modified to repeat an earlier statement assuring participants of the voluntary nature of the interview before the research team formally asks for consent.
3. Consent forms for TANF tablet program participants, TANF program participants, or individuals likely to be eligible for TANF (Attachments "Instruments" E - G) have been modified to include a signature line to receive their written consent for interviews, as requested by the project's IRB.

Time Sensitivities

This work is time sensitive. We need to start data collection this spring in order to complete this project on schedule. Timely approval of the proposed changes by the end of April will allow data collection to continue on the project timeline.