Diaper Distribution Demonstration and Research Pilot (DDDRP) Administrative Data Infrastructure Survey

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A

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Submitted By:
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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:**
  In October 2022, Administration for Children and Families (ACF) Office of Community Services, in partnership with ACF's Office of Planning, Research, and Evaluation, launched the Diaper Distribution Demonstration and Research Pilot (DDDRP) grant program. The proposed Partner Data Infrastructure Survey will collect information about baseline services and data collection practices at local partners of the seven grant recipients. ACF will use this information to inform grantee technical assistance and to design evaluation activities. We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** As a demonstration program, DDDRP requires evaluation activities. The grant program has a 24- month project period, beginning October 1, 2022. The information about organizations' baseline data capacity must be collected as soon as possible so that OCS and its grant recipients can provide technical assistance on data collection and so that evaluation activities can be quickly established.

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

A1.   Necessity for Collection

The Administration for Children and Families' (ACF) Diaper Distribution Demonstration and Research Pilot (DDDRP) is a 24-month pilot with the goal to build evidence about how Community Action Agencies, social services agencies, and other nonprofit community organizations may provide a consistent source of diapers and diapering supplies while also offering support services for families with low incomes. In FY22, the Office of Community Services (OCS) awarded grants to six states and one tribal entity.

As part of the 24-month pilot, and in cooperation with the grant recipients, ACF will conduct evaluation activities to understand DDDRP grant recipients' use of the funding to expand diaper distribution programs alongside wraparound services. This information collection request is designed to generate information about the administrative data collected and held by grant recipients' partners. DDDRP is a new grant program with flexibility in program design, and in order to develop an evaluation plan, it is important that ACF understand the data capacity of partner organizations.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency. ACF's Diaper Distribution Demonstration and Research Pilot was established by Section 1110 of the Social Security Act; 42 U.S.C. 1310. This program was funded by Div. H, Title II of the Consolidated Appropriations Act, 2022 (Public Law 117-103) as a non-statutory earmark as part of the Social Services Research and Demonstration. The information generated by this Information Collection Request (ICR) will inform planning for required evaluation activities.

A2.   Purpose

Purpose and Use

This ICR contains one instrument designed to help ACF understand the availability of administrative data for program evaluation and performance management purposes. The information collected will be for internal planning purposes to inform program evaluation design, the development of performance measures, and data-related technical assistance to grant recipients and their partner organizations. Program evaluation will occur under a competitively-awarded contract, and any associated information collections will be submitted for OMB review and approval as required.

- **Instrument 1: DDDRP Partner Organizations Data Infrastructure Survey**
  The data infrastructure survey proposed in this ICR will collect information about baseline data collection practices and wraparound services offered by the partner organizations associated with the seven DDDRP grant recipients. ACF will use this information to inform grantee technical assistance (TA) designed to (1) improve the quality of programs' administrative data and (2) support program evaluation activities. Although the main purpose of the data collection is not for publication, the resulting information may be included in technical assistance plans,

presentations, infographics, project specific reports, or other documents relevant to the field, such as federal leadership and staff, grantees, local implementing agencies, and/or Training (T)/TA providers. We do not intend for this information to be used as the principal basis for public policy decisions.

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

- Delivery of T/TA and/or workflows related to program implementation or the development or refinement of program and grantee processes. This could include the development and refinement of recordkeeping or communication systems.
- Planning for provision of programmatic or evaluation-related T/TA.
- Obtaining input on the development of program performance measures (PM) from grantees.
- Obtaining feedback about processes and/or practices to inform ACF program development or support.

The information collected through this ICR 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

The DDDRP Data Infrastructure Survey will answer the following questions about baseline services and data capacity of partner organizations:

- What services do the partner organizations provide at the beginning of the grant period, including but not limited to diaper distribution?
- What, if any, personally-identifiable information and demographic data are currently collected at the point of diaper distribution?
- What administrative data are currently stored in the organization's main data system, including demographic information and information about the services that beneficiaries receive?

Information Collection Procedures and Processes

The DDDRP Partner Organizations Infrastructure Survey will be a one-time web survey of Partner Organizations. It will be sent to the universe of DDDRP grantee partner organizations, using contact information provided by the grant recipients. ACF expects a 100% response rate; participation in information collections associated with DDDRP evaluation is a requirement of grant receipt.

Data Collection Activity	Instruments	Respondent, Content, Purpose of Collection	Mode and Duration
Survey of grant recipient partner organizations	Instrument 1: DDDRP Partner Organizations Data Infrastructure	**Respondents**: Representatives from 35 partner organizations associated with DDDRP grant recipients. **Content**: Five questions about organizations' current services, data collection practices, and	**Mode**: Web Survey **Duration**: 30 minutes

	Survey	data system. **Purpose**: To understand organizations' baseline data collection capacity and the availability of local administrative data, to inform technical assistance and evaluation activities.	

Other Data Sources and Uses of Information

The DDDRP Partner Organizations Infrastructure Survey will be the primary uniform data collection to inform data-related technical assistance activities to DDDRP partner organizations. For the purposes of planning for performance measurement, additional information may be collected[1]. The information collected by this survey will be used in conjuction with data collected in a future evaluation, which is currently in the planning phases and scheduled to begin in 2023.

ACF is also collecting information about the seven prime grant recipients' baseline data capacity and reporting relationships with partner organizations[2]. It is necessary to collect information at both organizational levels given the design of the grant program and variations in the program model across grant recipients. Information collected from grant recipients will be used in conjunction with the information from the Partners Survey as an input to the design of grant performance measures and in other evaluation activities.

A3. **Use of Information Technology to Reduce Burden**

The DDDRP Partner Organizations Infrastructure Survey will be administered using web-based survey software. As appropriate, the web survey will be designed with automated skip patterns to increase the quality of information and reduce the burden of submitting information to ACF.

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

In its administration of DDDRP, OCS is also conducting data collection to provide timely information about the demographic profile of benefits recipients and baseline measures of their diaper need. Across administrative collections and collections associated with planned evaluation activities, OCS and OPRE are working together to ensure that data collections are complementary and not duplicative.

The DDDRP Data Infrastructure Survey will collect information that is not otherwise uniformly available. The information collected through this survey will be used to understand the quality and availability of administrative data that may be used for performance measurement and evaluation of the grant program.

By understanding available administrative data, ACF will be able to plan evaluation activities that (a) are based in a realistic understanding of organizational data capacity, which will increase the quality and utility of the resulting data and (b) take advantage of existing administrative data to reduce duplication of grantee and beneficiary effort.

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[1] If future collection of information is subject to the Paperwork Reduction Act, ACF will submit an ICR specific to those activities.

[2] Since there are only seven grant recipients, this activity is not subject to the Paperwork Reduction Act.

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 a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

Consultation with Experts

The DDDRP Partner organizations survey instrument was designed with the input of staff in OCS and OPRE's Division of Data and Improvement that have familiarity with the types of organizations involved in the DDDRP and typical issues associated with data infrastructure and data capacity in such organizations.

A9.   **Tokens of Appreciation**

This information collection will not provide tokens of appreciation.

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

Personally Identifiable Information

The DDDRP Partner Organizations Infrastructure Survey will include the names and contact information for organizational representatives completing the survey for the purpose of clarifying responses, as needed. Information will not be maintained in a paper or electronic system from

which data are actually or directly retrieved by an individual's 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

ACF shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. We have developed a Data Security Plan that assesses all protections of respondents' PII. All of ACF's employees and contractors who perform work on this project will be trained on data privacy issues and comply with the above requirements.

ACF and its contractors shall use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. ACF's contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or PII that ensures secure storage and limits on access.

A11. **Sensitive Information** [3]

This ICR will not collect sensitive information.

A12. **Burden**

Explanation of Burden Estimates

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[3] 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.

For the Partner Organization survey, burden hour estimates were developed based upon the number of grant recipient partners of the 7 grant recipients. The service area questions were designed to align with standardized OCS reporting categories to minimize the burden of identifying relevant information.

Estimated Annualized Cost to Respondents

The Partner Organization survey will likely be completed by an executive director or program manager of a social service agency. To calculate the average hourly wage rate, ACF took the average of the full-time hourly wages for job code 21 – 0000 Community and Social Services from 2021. Source: Average hourly wages for occupational groups and areas by job characteristic, civilian workers (bls.gov). To account for overhead and fringe benefits, we multiplied this amount by two ($58.40).

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
DDDRP Partner Organizations Infrastructure Survey	35	1	0.5	18	$58.40	$1,051.20
			Totals:	18		$1,051.20

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 under this current request will be $4,100. This sum reflects federal staff time to design the survey, administer data collection, and analyze data. The average salary of the staff working on this program is a GS13, which is compensated at an average wage rate of $106,823 annually, $51.38 hourly. It is anticipated that federal staff will spend about 80 hours on this project

There are no additional costs beyond the normal labor costs for staff.

Activity	Detail	Estimated Cost
Survey administration	• FTE time • Operational expenses (such as equipment, overhead, printing, and staff support), A • Other expenses which would not have been incurred without this collection of information	$3080
Analysis and initial dissemination	• FTE time • Operational expenses (such as equipment,	$1020

	overhead, printing, and staff support), A • Other expenses which would not have been incurred without this collection of information	
	Total/Annual costs over the request period	$4100

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

This survey will be administered over a four-week period following OMB approval. Analysis and reporting will be internal to ACF, and completed within two months of the close of the survey period.

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: DDDRP Partner Organizations Infrastructure Survey