

Mother and Infant Home Visiting Program Evaluation: Third Grade Follow-Up (MIHOPE-3G)

OMB Information Collection Request
0970 - 0402

Supporting Statement Part A

July 2023

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officers:
Nancy Geyelin Margie
Laura Nerenberg

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

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a revision of an existing package. We are requesting three years of approval.

- **Progress to Date:** OMB has approved data collection packages for three earlier phases of the Mother and Infant Home Visiting Program Evaluation (MIHOPE) (OMB Control Number 0970-0402):
 - On July 12, 2012, OMB approved the data collection package for Phase 1 (MIHOPE 1), which covered the collection of data at baseline, when 4,229 families were enrolled into the study.
 - On June 26, 2013, OMB approved the data collection package for Phase 2 (MIHOPE 2), which covered the collection of follow-up data when the children in the study were 15 months old. The sample fielded for this follow-up included 4,218 families (see Figure B.1 in Supporting Statement B).
 - On August 6, 2015, OMB approved the data collection package for MIHOPE Check-in to collect updated contact information and follow-up data on children and parents when the children in the study are 2½, 3½, and 4½ years old. The sample fielded for this follow-up included 4,113 families (see Figure B.1 in Supporting Statement B). Data collection was completed when children were 2 ½ and 3 ½ years old. We did not move forward with data collection at 4 ½ years of age as we instead initiated a kindergarten data collection.
 - On November 28, 2018, OMB approved the data collection package for the kindergarten follow-up (MIHOPE-K), which covered the collection of follow-up data when the children in the study were in kindergarten. The sample available to be fielded at the start of the kindergarten follow-up was 4,113 families and we have completed kindergarten data collection with the MIHOPE families. OMB approved an extension request to continue the MIHOPE-K data collection on January 7, 2022. MIHOPE-K data collection is currently on-going.
 - This request is for the collection of administrative data as part of a longitudinal study of home visiting when the children in the study are in approximately third grade (MIHOPE-3G).

- **Timeline:** Because women enrolled in the study over the course of a few years and could have been pregnant or had a child who was up to six months in age at the time of enrollment, it takes approximately four academic years for all children in the MIHOPE sample to complete a single grade in school. Children in the last cohort (Cohort 4) of the MIHOPE sample will be attending third grade during the 2024-2025 school year (see Table 4 in Supporting Statement A, Section A16).

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- **Previous Terms of Clearance:** There were no terms of clearance for the previous approval of this data collection.

- **Summary of changes requested:** The purpose of the MIHOPE-3G data collection is to assess the long-term effects of MIECHV-funded home visiting on families and children when participating children are in elementary school. MIHOPE-3G will be based on administrative data alone (earlier follow-ups for MIHOPE have involved direct data collection from study participants in addition to administrative data acquisition). The MIHOPE-3G study design includes a benefit-cost analysis, which also was not conducted in prior phases of MIHOPE. Conducting this benefit-cost analysis when children in MIHOPE are in third grade will allow time for benefits to accrue as the study team will obtain school records with information about reading and math test scores at the first point at which they become available. Since MIHOPE-3G has been designed to make use of pre-existing administrative records, burden estimates are based on the amount of time required for state and local agencies to provide the requested administrative data for the study (instruments are included that indicate how outreach to administrative data agencies will be conducted). We do not intend for this information to be used as the principal basis for public policy decisions.

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A1. Necessity for Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to continue to conduct a long-term follow-up of the families participating in the Mother and Infant Home Visiting Program Evaluation (MIHOPE). In 2011, ACF and the Health Resources and Services Administration (HRSA) within HHS launched MIHOPE and the study began enrolling eligible mothers in 2012 (see Supporting Statement B2: *Target Population* for eligibility criteria) and has followed up with the recruited sample when the MIHOPE child was 15 months, 2.5 years old, 3.5 years old, and enrolled in kindergarten. The proposed information collection would follow up with families while the MIHOPE child is in elementary school, in approximately third grade. Completing this information collection is necessary for understanding the effectiveness of the Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) in its first few years of operation and for helping states and practitioners develop and strengthen home visiting programs in the future (see Supporting Statement A, A2).

The legislation that authorized MIECHV indicated that home visiting programs are expected to improve school readiness and academic achievement. The MIHOPE third grade follow-up allows researchers to obtain school records that include reading and math test scores at the first point at which they become available. Further, the legislation called for an evaluation that includes an assessment of the potential for home visiting programs to reduce costs. Obtaining information at or following third grade is especially important for conducting benefit-cost analyses because allowing more time for benefits to accrue will provide more precise estimates of these benefits (see Supporting Statement B, B1).

Appropriateness of Study Design and Methods for Planned Uses

There are no legal or administrative requirements that necessitate the collection. ACF and HRSA are undertaking the collection at the discretion of the agencies.

A2. Purpose

Purpose and Use

The purpose of this ongoing data collection activity is to help us understand the long-term effects of home visiting, the pathways through which home visiting affects families' long-term outcomes, and the benefits compared with the costs of home visiting. This OMB package focuses on the data collection to continue to follow-up with the MIHOPE sample when the children are in elementary school. The goals of the MIHOPE study are:

- (1) to understand the effects of home visiting programs on parent and child outcomes, both overall and for key subgroups of families,
- (2) to understand how home visiting programs were implemented and how implementation varied across programs, and
- (3) to understand which features of local home visiting programs are associated with larger or smaller program impacts.

The information collected is meant to contribute to the body of knowledge on ACF programs so that the effects of home visiting can be better understood by ACF, HRSA, and the field. It is not intended to be

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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.

Research Questions or Tests

The four research questions MIHOPE is trying to answer are:

1. What are the long-term effects of home visiting overall for the MIHOPE sample?
2. Are the long-term effects of home visiting larger for some families than for others?
3. How do the benefits of home visiting compare to its costs?
4. What are the pathways through which home visiting affects families' long-term outcomes?

Study Design

Families who were recruited into MIHOPE were randomly assigned either to a MIECHV-funded local home visiting program or to a control group that could use other services available in the community. This MIHOPE third grade follow-up will gather data when families in the MIHOPE sample have children around third grade age (for some families in the study, data acquired will cover periods of time beyond children's third grade school year).¹ Information will be collected solely through administrative data collection. The instruments to be used for outreach to state and local education agencies from which we would like to collect data are described in Table 1. MIHOPE has previously collected child welfare records and school records – using similar outreach materials – from some of the agencies that we plan to contact requesting data for the approximately third grade follow-up.

Table 1 - Overview of Data Collection Activities and Instruments

<i>Data Collection Activity</i>	<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
State and local education agency school records: data file submission	Instrument 1_School Records Request From Existing Data Provider Instrument 2_School Records Request From New Data Provider	Respondents: 48 contacts at state and local education agencies Content: Template language to use when emailing agency staff Purpose: Request to agency staff to provide school records data for MIHOPE-3G. This will be a new request to staff at agencies that did not provide data for the kindergarten follow-up or a supplementary request to staff at agencies that have been providing data for the kindergarten analysis	Mode: Email communication and possibly phone call(s) as follow-up(s) Duration: Discussions will occur through email or phone with staff at data agencies regarding topics related to providing administrative data; these discussions will proceed after the initial email outreach if the administrative data agency engages in conversations with the study team

¹When requesting administrative data from data providers, we will ask for data through a specific date (for example, the end of an academic school year or calendar month). Since children in the study will reach third grade at different points in time, this means we may receive data beyond third grade for some children. For example, we will request standardized test scores for students and will expect to receive third grade test scores, but may also receive standardized test scores from fourth or fifth grade for some students in the study.

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State child welfare records: data file submission	Instrument 3_Child Welfare Records Request From Existing Data Provider Instrument 4_Child Welfare Records Request From New Data Provider	Respondents: 11 contacts at state child welfare agencies Content: Template language to use when emailing agency staff Purpose: Request to agency staff to provide child welfare data for MIHOPE-3G. This will be a new request to staff at agencies that did not provide data for the kindergarten follow-up or a supplementary request to staff at agencies that have been providing data for the kindergarten analysis	Mode: Email communication and possibly phone call(s) as follow-up(s) Duration: Discussions will occur through email or phone with staff at data agencies regarding topics related to providing administrative data; these discussions will proceed after the initial email outreach if the administrative data agency engages in conversations with the study team
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Other Data Sources and Uses of Information

This information collection builds on data collected for previous phases of MIHOPE (see A1 for an overview or RegInfo.gov for materials related to past requests²). For the third grade follow up, outcomes will be measured through administrative records. Additional administrative data will continue to be collected directly from the agencies that hold the data, in its existing format, placing no extra burden on agencies. For example, we plan to continue to collect data from:

- Center for Administrative Records Research and Applications,
- Criminal Justice Administrative Records System,
- National Death Index,
- National Directory of New Hires,
- National Student Clearinghouse, and
- Research Data Assistance Center data on Medicaid paid claims through the CMS Medicaid Analytic eXtract and transformed Medicaid Statistical Information System Analytic File.

The MIHOPE consent form allows the study to collect administrative data until the end of the study. If the study continues past the point at which children turn 18 years old, we will need to obtain the children’s consent when they are 18 years old in order to continue to collect administrative data about them.

A3. Use of Information Technology to Reduce Burden

This study uses information technology, when possible, to minimize burden on participants and to collect data efficiently. For administrative data, the study team will arrange for data transfers via secure and efficient means, such as through use of the file transfer platform, Box. Additionally, the study team will create files to request data from agencies for sample members based on the preferred file format of the agency (for example, Excel, SAS, or TEXT files). If the study team has questions about data received from an administrative data agency, questions will be asked through the agency’s preferred means, such as a phone discussion, email, or questions and responses shared via Box.

² <https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0402>

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

This research does not duplicate any other data collection being conducted. The purpose of the MIHOPE third grade data collection is to better understand the long-term impacts of home visiting programs on child and family outcomes. We are not aware of any data collection efforts that have conducted long-term follow-up with home visiting participants with a sample of this scale. The third grade follow up has been designed to make use of pre-existing administrative records and in doing so does not place a burden on families.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is an additional data collection for MIHOPE that will provide information on children in the study when they are in approximately third grade. This will entail collecting administrative data on these children from state and local education agencies and state child welfare agencies. Information is being derived from state and local education agencies' school records and state child welfare records for MIHOPE's kindergarten follow-up as well. (The administrative data collection effort for kindergarten is close to concluding, but has not ended yet.) We are hoping to collect data from many of the same agencies that we have contacted about acquiring administrative data for MIHOPE's kindergarten follow-up, although we may reach out to additional local education agencies for the third grade data collection effort (i.e., with whom we have not initiated contact for the kindergarten follow-up).

The need to collect administrative data when children in the study are in approximately third grade is to analyze the longer-term effects of early childhood home visiting when children are in the middle of elementary school. Third grade also represents an opportune time for assessing academic achievement of children in the study through state and local education agencies' school records, as it is the first time standardized tests are administered nationally.

For this round of administrative data collection, we are expecting either two or three data extracts from each state or local education agency (as noted in the burden table, Table 2) because the children in the study reach their third grade year during four different academic years (from 2021-22 through 2024-25). To be able to abide by the study's reporting timeline, one "interim" data extract will be requested from most agencies providing administrative data, although a second "interim" file will be needed for one agency due to data expungement (more details provided about this in the response to question A12). Additionally, a "final" data extract will be requested from all data providers. The "interim" file(s) will allow the study team to conduct preliminary data processing and analyses with earlier cohorts of children, while the "final" data file will include the fourth cohort of children and will provide complete data for the third grade analysis. If the requests for data from administrative data agencies were to be less frequent (that is, only one time), then the study would risk not being able to report on findings by the conclusion of the funding period.

A7. Now subsumed under 2(b) above and 10 (below)

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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 activity. This notice was published on May 11, 2023, Volume 88, Number 91, page 30310, and provided a sixty-day period for public comment. During the notice and comment period, we did not receive any comments.

Consultation with Experts Outside of the Study

The following experts have provided guidance on the third-grade follow-up:

- Rebecca Maynard (University of Pennsylvania)
- Lynn Karoly (RAND Corporation)
- Max Crowley (Pennsylvania State University)

A9. Tokens of Appreciation

No tokens of appreciation will be provided.

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

Personally Identifiable Information

Only the minimum necessary direct identifiers (i.e., personally identifiable information) will be shared with various state, federal, and local agencies to be used for matching sample members to their administrative data sources. All data with personally identifiable information will be transferred in a secure manner.

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. MIHOPE sample members were informed of all planned uses of their data, that their participation in the study 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.

Due to the sensitive nature of this research (see A.11 for more information), the evaluation is covered by a Certificate of Confidentiality through HRSA. The MDRC Institutional Review Board (IRB), the IRB of record for this information collection, has approved this information collection and the most recent IRB approval letter is attached (see Appendix A: MIHOPE_IRB Approval letter).

The study team is committed to protecting the privacy of participants and maintaining the privacy of the data that are entrusted to us and is experienced in implementing stringent security procedures. Every

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MDRC employee is required to sign a pledge to assure participants of nondisclosure of private information.

Data Security and Monitoring

MDRC uses Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. MDRC securely generates and manages encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. MDRC has ensured that this standard is incorporated into the MDRC's property management/control system and established 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 is secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, MDRC minimizes 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 personally identifiable information that ensures secure storage and limits on access.

Personally identifiable information is removed from study files, which contain a linking identification number that can be used to match records from one data file to another. Finally, data is available only to staff associated with the project through a Virtualized Desktop (VDI) Infrastructure (VDI application). Amazon's VDI application is provided using AWS Workspaces. Data within the AWS workspace are encrypted at rest and require multi-factor authentication to access.

All project data remain stored on MDRC's secure cloud-based environment. When data are shared with other entities, data are only transferred as necessary and are transferred using secure and encrypted channels.

MDRC utilizes formal incident response mechanisms and procedures to respond to data security incidents in a manner that protects both the potentially compromised information and the individuals affected. Data security incidents will be reported to the Contracting Officer's Representative (COR) within one hour of discovery and will be immediately escalated to all members of the MDRC's Incident Response Team, consisting of MDRC's Chief Security Officer and Senior Vice President, Chief Information Officer, and General Counsel. The team will quickly evaluate the incident and determine whether there was a data breach and will decide on the necessity of further action on the part of MDRC.

Upon completion of the project analyses, direct identifiers will be removed from the data and data will be further masked to prevent reidentification. These masked data will be archived as restricted access files along with other MIHOPE data at the Inter-University Consortium for Political and Social Research. All users requesting access to these restricted access files must sign an agreement that requires users to protect any sample member's information from deductive disclosure risk, abide by strict data security requirements, avoid inadvertent disclosure of private persons by agreeing to minimum cell size requirements in publications, and not be staff associated with programs participating in MIHOPE who have had personal familiarity with one or more study participants or know the local programs participating in the study.

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A11. Sensitive Information³

In order to collect administrative data from local, state, and federal agencies, sample members were asked for their Social Security Numbers at study entry and also during the kindergarten interview if the study team did not already have a sample member's Social Security Number. MIHOPE sample members were informed of all planned uses of their data, that their participation in the study is voluntary, and that their information will be kept private to the extent permitted by law. The study team only uses Social Security Numbers to match the sample to administrative data sources when the agencies providing data require the use of Social Security Numbers to perform the match. For example, Social Security Numbers are required for matching the sample to the National Directory of New Hires database, which is used to measure mothers' employment and income. A random unique identifier created for the purpose of this study is otherwise used to identify sample members.

A12. Burden

Explanation of Burden Estimates

The remaining burden for ongoing data collection activities is 3,902 hours (see Table 2, below). To date, the study team has been collecting data through the time children in the study were in approximately kindergarten. The kindergarten direct data collection with study participants is complete, but some administrative data are still being collected from states and local education agencies. For the "Remaining Burden from Previously Approved Information Collection" from kindergarten, we are in communication with 8 states and local education agencies for school records data as well as 5 state child welfare agencies to finalize the final data extracts for the kindergarten analysis; the estimated burden associated with communication with these agencies is shown in Table 2.

For the current data collection proposed for MIHOPE-3G we will collect administrative data from states and local education agencies through the time children are in approximately third grade. We plan to reach out to 11 state agencies to request child welfare data and expect to be in contact with up to 48 states and local education agencies for school records data for the study (11 states and 37 local education agencies). We expect to request one "interim" data file and one "final" data file (so, two data extracts in total for each of the 48 states or local education agencies). For child welfare records data, we expect to request one "interim" data file from most states, but will need to request two "interim" data files from one state due to data expungement; a final data file will be requested from each state as well (so, three data files from one state and two data files from ten states). The burden for this data acquisition effort is shown in Table 2 as well.

Estimated Annualized Cost to Respondents

For collecting school records and child welfare records data from states and local education agencies, we used an hourly wage of \$46.35, which is the median for Computer and Information Analysts.⁴

³Examples 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.

⁴https://www.bls.gov/oes/current/naics4_999300.htm#15-0000

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Thus, the burden estimates presented, below, include hours and assumed wages for staff at states and local education agencies for the third grade data collection effort as well as effort and assumed wages for staff at agencies where we are still in the process of collecting some administrative data for the study’s kindergarten follow-up point, which is why there is some unused burden from the previously approved information collection.

Table 2 – Total Burden Requested Under this Information Collection

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage	Total Annual Cost
Remaining Burden from Previously Approved Information Collection (MIHOPE-K)							
State and local education agency school records: data file submission	8	1	15.6	125	42	\$46.35	\$1,946.70
State child welfare records: data file submission	5	1	8.4	42	14	\$46.35	\$648.90
New Request - MIHOPE-3G							
State and local education agency school records: data file submission	48	2	33.75	3,240	1,080	\$46.35	\$50,058.00
State child welfare records: data file submission	11	2.1 ^a	21.43	495	165	\$46.35	\$7,647.75
Total				3,902	1,301		\$60,301.35

NOTE: The 2.1 responses is a weighted average that reflects that the study team expects to collect 2 data extracts from 10 states and 3 data extracts from 1 state.

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

Table 3 shows costs to the Federal government, which were calculated based on estimates of the hours required for MIHOPE’s study team to conduct the data collection, analyze the data, and publish findings

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as well as the costs (that is, operational expenses) associated with this time. The total costs are annualized based on a three-year request period.

Table 3 – Estimated Costs to the Federal Government

Cost Category	Estimated Costs
Field Work	\$300,000
Analysis	\$1,790,000
Publications/Dissemination	\$300,000
Total costs over the request period	\$2,390,000
Annual costs	\$796,667

A15. Reasons for changes in burden

This is a revision of an existing information collection for MIHOPE (OMB #0970-0402). The estimated burden has changed for two reasons:

1. Burden associated with the MIHOPE kindergarten follow-up has been updated to show only remaining burden to complete data collection.
2. Burden associated with a the new MIHOPE-3G data collection has been added.

Additionally, we have updated hourly wage used in these calculations for staff from agencies from which we will collect administrative data to reflect current data.

A16. Timeline

Because women enrolled in the study over the course of a few years and could have been pregnant or had a child who was up to six months in age at the time of enrollment, it takes approximately four academic years for all children in the MIHOPE sample to complete a single grade in school. Table 4 shows the school years that children in the MIHOPE sample will be in third grade. Children in Cohort 4 of the MIHOPE sample will be attending third grade during the 2024-2025 school year. Therefore, interim data files would need to be received in early 2025 to cover the third grade school year for the first three cohorts of children. In the latter half of 2025 and early 2026, final datasets would be acquired, processed and analyzed (to cover Cohort 4). Finally, a report would be written and produced throughout 2026 and 2027.

Table 4 – MIHOPE Cohorts in Third Grade

		School Year			
		2021-2022	2022-2023	2023-2024	2024-2025
Cohort 1	~600	third grade			
Cohort 2	~2,050	third grade			

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Cohort 3	~1,200	third grade
Cohort 4	~150	third grade

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Current Request – MIHOPE-3G Materials

- Instrument 1_School Records Request From Existing Data Provider
- Instrument 2_School Records Request From New Data Provider
- Instrument 3_Child Welfare Records Request From Existing Data Provider
- Instrument 4_Child Welfare Records Request From New Data Provider
- Appendix A_MIHOPE_IRB Approval Letter

Previously Approved and Ongoing with No Changes – MIHOPE-K Instruments

- Instrument 5_MIHOPE-K Child Welfare Records Request
- Instrument 6_MIHOPE-K School Records Request