Generic for ACF Program Monitoring Activities

OMB Information Collection Request
0970 – 0558

Supporting Statement Part A - Justification

Type of Request: Revision

October 2023

Administration for Children and Families
U.S. Department of Health and Human Services

1. **Circumstances Making the Collection of Information Necessary**

This information collection request (ICR) is for a revision to the umbrella Generic for ACF Program Monitoring Activities. The current expiration date is November 30, 2023. The overall proposed purposes, uses, and scope of the umbrella remain unchanged. The only changes are to the burden estimates, as described in sections A12 and A15.

The Generic for ACF Program Monitoring Activities allows Administration for Children and Families (ACF) program offices to collect standardized information from recipients that receive Federal funds to ensure oversight, evaluation, support purposes, and stewardship of Federal funds. The information is necessary to ensure compliance with Federal and programmatic requirements, monitor progress on recipient activities, and determine and respond to recipient needs such as Training and Technical Assistance (T/TA).

ACF is primarily a grant-making agency that promotes the economic and social well-being of families, children, individuals and communities with partnerships, funding, guidance, T/TA.

ACF program offices have evolving monitoring needs, dependent on both internal and external factors, such as but not limited to: current grantee activities, needs; uses of federal funds; changes to aspects of programs based on statutory authority, federal regulations or policy, and/or Congressional appropriations; availability of program office funds for site visits (v. desk monitoring); matters of importance related to national health and safety needs of the public, or other events that lead to program changes. There are times when standardized collections of information would be helpful for program offices as they monitor recipient activities and needs. This generic clearance allows program offices the flexibility to create tailored information collections based on current circumstances and to receive approval for these in a timely manner. This is important to allow for ACF's:

- monitoring of compliance with federal practice, guidelines and requirements,
- quick understanding of and remediation to national, regional, and/or site-specific issues,
- provision of support as needed,
- accurate assessment of the efficiency and efficacy of recipient activities
- documentation of promising practice, innovative services, and program strengths
- flexible and responsive oversight of federal funds

2. **Purpose and Use of the Information Collection**

Program monitoring is a post-award process through which ACF assesses a recipient's programmatic performance and business management performance. Monitoring activities are necessary to ensure timely action by ACF to support grantees and protect federal interests. Program offices use information collected under this generic clearance to monitor funding recipient activities and to provide support or take appropriate action, as needed. This could include:

- Oversight and evaluation of grantee performance: technical/programmatic, financial, and business management.
- Assessment of progress towards meeting objectives provided in Notices of Funding Opportunities.

- Confirmation of compliance with grant requirements: determining whether federal grants are being used for the purposes for which they are made and taking appropriate actions for non-compliance and enforcement.
- Verification that programs/projects initiated by grantees are carried out in a manner consistent with the grantee's approved project goals and objectives, and in a manner consistent with ACF's expectations
- Confirmation and assessment of grantee's subrecipient partnerships.
- Program assessment: collecting additional information on the status, activities, and accomplishments of grantees for reports that the HHS Secretary delivers to Congress, as well as office- and program-specific reports.
- Day-to-day activities, activities performed at specified intervals, and periodic evaluations of grantee performance that are required by statute or policy.
- Determination of certain aspects of continued performance (e.g., continued funding).
- Determine if additional actions/support (e.g., T/TA) are needed to increase the potential for success or to protect federal interests (e.g., enforcement actions).
- Pretesting of the monitoring tools

The information gathered will be used primarily for internal purposes, but aggregate data may be included in public materials such as Reports to Congress or program office documents. Any plans for sharing information gathered using this generic clearance will be described in each program-specific generic IC (GenIC).

The following are some example monitoring data that might be submitted as a GenIC:
- Information about proposed approaches to demonstrating compliance with specific regulations
- Interview data with grantee staff about implementation of required activities to identify potential needs for support
- Assessment of project outputs and outcomes
- Data about caseloads and information about barriers to processing certain caseloads
- Survey data about changes to activities, processes, caseloads, etc. in response to a disaster or public health emergency

Example activities that would be out of scope for this generic include:
- Information collections for federally-sponsored evaluations.
- Information collections for GPRA performance measures.
- Information included in the SF-PPR or suitable for the ACF generic PPR.

A program-specific GenIC will be submitted to OIRA for each individual request, along with the Generic Program Support submission template (**Attachment A).** See the following for example GenICs: https://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=202307-0970-014.

3. **Use of Improved Information Technology and Burden Reduction**

Program offices may use some form of electronic collection, when appropriate. This could include web pages, email or other online data management systems. Grantees may be required to enter and retrieve information pertinent to their grants through electronic forms closely

resembling the paper forms (i.e., fillable PDFs or tailored online data management systems). Use of information technology will be described in each program-specific GenIC.

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are available. Program offices regularly review existing information available in materials such as grant applications, semi-annual and annual reports on performance progress and financial management, and documents or other materials developed by the grantee throughout the performance period. This information would be used in conjunction with data collected under these generic information collections but would not duplicate existing information available to ACF.

5. Impact on Small Businesses or Other Small Entities

These collections will not have an adverse impact on small entities.

6. Consequences of Collecting the Information Less Frequently

Less frequent collection of information would impact ACF's ability to effectively monitor funding recipient activities and to respond to recipient needs in a timely manner.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

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 March 9, 2023 (88 FR 14618) and provided a sixty-day period for public comment. ACF did not receive any comments during this first comment period.

Program offices may consult with individuals outside the agency on individual GenICs. If applicable, consultations will be described in each program-specific GenIC.

9. Explanation of Any Payment or Gift to Respondents

There are no payments of gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

Contact information (ex. name, email address, phone number, etc) may be collected for the purpose of following up. Respondents will be informed of intended use of their contact information. Additionally, program offices may request client files to review if information on files is in compliance with program requirement (ex. existence of required information, type/content of information). The program offices will inform respondents that information collected will be used for purposes related to ACF's monitoring of funding recipients. This could include sharing resulting information about the funding recipient in reports to Congress, for investigations by federal entities such as the HHS Office of the Inspector General and the US Government Accountability Office, or other related purposes.

Any assurances of confidentiality will be described in each program-specific GenIC.

11. Justification for Sensitive Questions

Information collections under this proposed generic clearance are not expected to include sensitive questions. Each program-specific GenIC will provide information about any potentially sensitive questions.

12. Estimates of Annualized Burden Hours and Costs

Total burden, including previously approved collections that are ongoing in addition to requested burden over the next three years is 56,901 hours (8,901 + 48,000 = 56,901 hours).

Previously Approved and Ongoing

The following generic information collections were previously approved under 0970-0558 **and are still in use**.

Form	Number of Respondents	Responses per respondent	Hours per response	Total burden hours
Annual Data Collection on Sexual Abuse and Sexual Harassment Involving Unaccompanied Children	300	1	1.5	450
Child Care and Development Fund (CCDF) State Monitoring Compliance Demonstration Packet	51	0.3333	50	850
Office of Grants Management Financial Monitoring Review	95	4	1	380
Office of Refugee Resettlement (ORR) Ethnic Community Self-Help (ECSH) Program Case Documentation Requirements	87	1	5	435
Office of Refugee Resettlement (ORR) Refugee Agricultural Partnership Program (RAPP) Case File Requirements	25	1	20	500
Office of Refugee Resettlement (ORR) Refugee Individual Development Accounts (IDA) Program Case File Requirements	31	1	20	620

Office of Refugee Resettlement (ORR) Refugee Microenterprise Development (MED) Program Case File Requirements	30	1	20	600
Office of Refugee Resettlement (ORR) Refugee Career Pathways (RCP) Case File Requirements	42	1	20	840
Office of Refugee Resettlement (ORR) Refugee Family Child Care Microenterprise Development (RFCCMED) File Requirements	15	1	10	150
Office on Trafficking in Persons (OTIP) Grant Monitoring Tool (GMT)	35	3	10	1,050
Survivors of Torture Integrated Care Continuum (SOT-ICC)	35	1	4	140
Office of Refugee Resettlement Monitoring of the Status of Required Licensure for Residential Care Providers	40	6	0.5	120
Office of Head Start Improper Payment Reviews	300	1	1	300
Community Services Block Grant (CSBG) Work Plan Template	20	1	3.25	65
Office of Head Start Survey on COVID-19 Mitigation Plan	100	1	.083	8
Office of Refugee Resettlement Ethnic Community Self-Help (ECSH) Program Pre-Monitoring Questionnaire (PMQ)	87	1	20	1,740
Office of Refugee Resettlement Refugee Individual Development Accounts (IDA) Program Pre-Monitoring Questionnaire (PMQ)	28	1	3	84
Office of Refugee Resettlement Refugee Career Pathways (RCP) Program Pre-Monitoring Questionnaire (PMQ)	14	1	5	70
Office of Refugee Resettlement Refugee Microenterprise Development (MED) Program Pre-Monitoring Questionnaire (PMQ)	15	1	5	75
Low Income Household Water Assistance Program (LIHWAP) Grantee Forecast	152	1	2	304
Office of Refugee Resettlement Services to Afghan Survivors of Combat Program Notification Letter and Pre-Monitoring Questionnaire	24	1	5	120
Totals/Averages:	1526	1.44	9.83	8901

Burden Estimates for Future GenICs

Burden estimates were calculated based on ACF program office feedback and previous submissions. Based on this information, we have increased the estimated average time per response from 10 to 12 hours, increased the number of respondents to 1,600 and decreased the estimated number of responses per respondent to 2.5. We expect a range of requests within

GenIC submissions and each program-specific GenIC will provide information about burden estimates.

Information Collection	Number of Respondents	Average Number of Responses per Respondent	Average Burden Hour per Response	Total Burden Hours	Estimated Hourly Wage	Total Estimated Cost
Program Monitoring Forms	1600	2.5	12	48,000	$53.62	$2,573,760

The costs per respondent is expected to vary based on program and the specific GenIC request. Each program-specific GenIC will provide information about cost estimates for that specific information collection. We have estimated a general overarching estimate here, based on Bureau of Labor Statistics data from 2022 for 21-0000 Community and Social Service Occupations (job code 21-0000; https://www.bls.gov/oes/current/oes210000.htm). The mean national hourly wage for this occupation is $26.81. Multiplying this by two (to account for fringe benefits and overhead) results in an average hourly cost of $53.62.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no other costs associated with this information collection.

14. Annualized Cost to the Federal Government

Estimated costs to the federal government are based on an estimate of 10% of the time of a GS-13 and GS-14 to oversee information collection activities. We estimate costs to the federal government for all GenICs submitted under this generic to be about $200,000 annually. The costs will vary by program office and by activity, though, and each program-specific GenIC will provide information about costs to the federal government.

15. Explanation for Program Changes or Adjustments

Burden estimates have been adjusted to reflect updated assumptions after this new generic mechanism has been in use. Overall we have:

- Increased the estimated average time per response from 10 to 12 hours per response
- Increased the estimated number of respondents from 1,500 to 1,600
- Reduced the estimated number of responses per respondent from 3 to 2.5

16. Plans for Tabulation and Publication and Project Time Schedule

 Any plans to publish results will be described in individual ICs under this generic clearance.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.