

**To:** Jordan Cohen  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Kathleen Dwyer and Erin Cannon  
Office of Planning, Research and Evaluation (OPRE)  
Administration for Children and Families (ACF)

**Date:** February 24, 2021

**Subject:** Non-Substantive Change Request – Next Steps for Rigorous Research on Two-Generation Approaches (OMB #0970-0356)

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This memo requests approval of non-substantive changes to materials for the Next Steps for Rigorous Research on Two-Generation Approaches information collection, approved under the umbrella generic: Formative Data Collections for ACF Research (OMB #0970-0356), that will allow us to proceed safely with data collection during the COVID-19 pandemic.

### ***Background***

OPRE received OMB approval for this generic information collection on July 31, 2020. Approval was granted for data collection related to formative evaluations designed to strengthen existing two-generation programs and inform the broader two-generation program field about approaches programs can take to improve their program models and readiness for evaluation.

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

In response to the pandemic, two-generation programs have modified their service delivery strategy from in-person to virtual. Program staff with whom we would conduct data collection activities are primarily working remotely and in-person meetings, such as those conceptualized in the data collection instruments, have not been possible. These shifts in service delivery mechanism necessitate changes from planned in-person data collection to virtual data collection. As such, we are requesting to shift the mode of data collection from an in-person site visit to telephone interviews, virtual focus groups, and virtual meetings (design sessions) conducted by videoconference. We have modified Supporting Statements A and B, Instrument 2 (site visit topic guide), and Instrument 3 (participant focus group protocol). Instrument 1, a program confirmation telephone interview protocol, Instrument 4, a staff survey that was intended to be administered online, and Instrument 5, a formative evaluation feedback survey, are unchanged. We have updated the burden estimate to reflect these changes, as well as a reduction in the total number of programs participating in NS2G from five to four. For details on the changes to data collection protocols, instruments, and attachments, please see Table 1.

### ***Time Sensitivities***

ACF requests approval as soon as possible in order to begin scheduled data collection in March 2021.

### ***Updated Materials***

The following revised materials are included with this submission:

- **Supporting Statements A and B**
- **Instrument 2**
- **Instrument 3**

**Table 1. Proposed Changes to Data Collection Procedures**

**Modifications to Instrument 2 (site visit protocol)**

The previously approved data collection procedures included a two-day site visit, with the first day including semi-structured interviews with program staff and observations of program activities. The second day of the site visit included a full-day strategic planning session to inform the development of a program logic model and identify strategies to strengthen the program model. In response to COVID-19, the modifications to Instrument 2 include changes in language to reflect that the interviews will be conducted by telephone or video conference (depending on the preference of the respondent), rather than in person, and will not be conducted in a single day. Additionally, the revised instrument has removed the program observation, because services are being provided virtually. Revisions to Day 2 activities reshape the full day of strategic planning activities into four virtual design sessions, conducted over a series of weeks. These revisions include several changes to the nature of the activities to accommodate virtual facilitation (for example, the logic modeling activity will be conducted asynchronously instead of during a design session). These changes are consistent with the initial proposed information collection.

**Modifications to Instrument 3 (participant focus group)**

The previously approved data collection procedures included a focus group with program participants to be conducted on-site during an initial two-day site visit in early 2021. The modifications to Instrument 3 include language to reflect the virtual setting of the focus group.

**Changes in burden**

The previously approved burden estimate for the NS2G data collection included engaging with 20 staff (4 per program) for Instrument 1, a total of 100 staff (20 per program) for Instrument 2, 60 participants (12 per program) for Instrument 3, and a total of 50 staff (10 per program) for Instrument 4, and 15 staff (3 per program) for Instrument 5. NS2G has 4 participating sites instead of the originally planned total of 5, the burden estimate for Instruments 1, 2, 3, 4, and 5 of the NS2G data collection will decrease by 20 percent. Additionally, the average burden per response for Instruments 2 and 3 has been reduced due to the shift to virtual data collection.

**Addition of tokens of appreciation**

The previously approved data collection procedures did not include tokens of appreciation for focus group participants. Previously, our intention was to ask programs to let us speak with participants during the normal program delivery time, such as asking participants to step away from class to participate in the focus group. In response to COVID-19, we are moving to a virtual format for the focus groups. The virtual format of our groups alongside virtual delivery of many other services and communications in families' lives means we will need to offer focus groups at different times, to caregivers who may have even more demands on their time than in the pre-COVID environment, and that participants may also incur additional cost (such as child care) to enable them to participate. Therefore, this nonsubstantive change request includes a \$20 token of appreciation for focus group participants to offset incidental costs such as child care and encourage program participants to attend and take part in virtual focus groups. Focus groups are estimated to take about an hour.