

Requested Amendment to OMB-Approved Project: “Human Services and Environmental and Climate Justice: Considering Community Concerns and Program Options” (NOA date 9/12/22)

We are submitting an amendment to approved project “Human Services and Environmental and Climate Justice: Considering Community Concerns and Program Options” (NOA date 9/12/22), requesting two changes: 1) the addition of 34.5 participant hours for program-participant individual interviews and small group interviews (14 virtual interviews and two in-person small group interviews of eight people each), and 2) an increase in the participant incentive. No other changes to the study are anticipated or requested. These requests are made in response to lessons learned during data collection undertaken for the study so far and additional information on the importance of including people with lived experience in exploratory policy research to enhance the quality of its findings and advance critical equity goals. We intend to conduct these individual interviews and small group interviews in February-April 2024 in the same locations and with participants in the same HHS programs as outlined in the original submission, and to use the same methods, with the addition of two in-person small group interviews of approximately 90 minutes each. The interviews and small group interviews will use the same discussion guide as approved in the original submission.

As the original PRA submission noted, the intended purpose of the study is to “inform a larger initiative by the Department of Health and Human Services to identify and facilitate opportunities for staff and partners in federal human services programs to advance environmental and climate justice among their participants and programs... The broad project goal is to better understand local environmental and climate concerns that affect the people that human services programs serve; program, community, and participant perspectives on these concerns; and potential ways to better address environmental and climate risks within the context of human services. The project is motivated by Executive Order 13985, “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,”¹ and Executive Order 14008, “Tackling the Climate Crisis at Home and Abroad,” which calls on agencies to “deliver environmental justice in communities all across America.”² Both Executive Orders require a “whole of government” approach” that our office seeks to support.

Since the original PRA submission, a third Executive Order, #14096, “Revitalizing Our Nation’s Commitment to Environmental Justice for All,”³ reinforces the importance of this work across federal agencies.

¹ The Federal Register, “Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.” 25 January 2021. <https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government>

² The Federal Register, “Tackling the Climate Crisis at Home and Abroad.” 27 January 2021. <https://www.federalregister.gov/documents/2021/02/01/2021-02177/tackling-the-climate-crisis-at-home-and-abroad>

³ The Federal Register, “Revitalizing Our Nation’s Commitment to Environmental Justice for All.” 21 April 2023. <https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>

12-5-23;rev 1-12-24 ASPE Generic Information Collection Request Non-Substantive Amendment

OMB No. 0990-0421

We learned from the study's completed interviews and other sources about the importance to the goals of research quality and equity of participation in research by people with lived experience such as program participants.⁴ This has also been reinforced by several additional executive orders such as Executive Order 14091, "Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government,"⁵ and Executive Order 14058, "Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government,"⁶ in addition to Executive Order 13895, noted above.

Fairly compensating people with lived experience, such as program participants, for the value of their time and their insights is a critical component of research that relies on their perspectives.⁷ It is also essential for facilitating the participation of program clients in a study with limited time for recruitment. These two factors motivate our decision to increase the incentive for participation in interviews to \$50. Further, for HHS program participants in in-person small group interviews we intend to provide an additional \$25 to compensate them for the costs of transportation and child care or other care responsibilities during their participation, coming to a total payment of \$75 for these study participants. Program participants are, by definition, low-income, many are parents, and many have hourly jobs. Low-income status also places additional barriers to small group interview participation.

Evidence shows that monetary remuneration bolsters recruitment and small group interview attendance. According to Krueger and Casey (2014), it is "more efficient to pay more for incentives.... [to] increase the likelihood that people will show up," concluding that "...amounts of \$50 to \$75 usually work for public and nonprofit studies" (p. 78). In addition to increasing attendance, Krueger and Casey also note that "...as the incentive goes up, recruiting time goes down," (p. 78). This is especially important for the current study because of the tight timeline for recruiting and the challenges in ensuring that participants who have actually used HHS human services programs participate in the small group interview discussions.

A revised burden hour chart with revisions tracked is included here (no changes were made to the study participation of program staff, only to that of program participants). The requested

⁴ See, among other resources, Sonia Torres Rodríguez, Mikaela Tajo, Shamoia Washington, Kimberly Burrowes. 2022. "Changing Power Dynamics among Researchers, Local Governments, and Community Members: A Community Engagement and Racial Equity Guidebook." The Urban Institute. <https://www.urban.org/research/publication/changing-power-dynamics-among-researchers-local-governments-and-community>.

⁵The Federal Register, "Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government." 26 February 2023. <https://www.federalregister.gov/documents/2023/02/22/2023-03779/further-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal>.

⁶ The Federal Register, "Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government." 13 December 2021. <https://www.federalregister.gov/documents/2021/12/16/2021-27380/transforming-federal-customer-experience-and-service-delivery-to-rebuild-trust-in-government>

⁷ See Mel Langness, Justin Winston Morgan, Saily Cedano, and Elsa Falkenburger. 2023. "Equitable Compensation for Community Engagement Guidebook." The Urban Institute. <https://www.urban.org/research/publication/equitable-compensation-community-engagement-guidebook>.

12-5-23;rev 1-12-24 ASPE Generic Information Collection Request Non-Substantive Amendment

OMB No. 0990-0421

changes to the study result in an increase of 34.5 total burden hours (from 45 to 79.5 hours), and an increase in burden cost of \$517.50 (from \$923.40 to \$1,440.90).

BURDEN HOUR COMPUTATION (*Number of responses (X) estimated response or participation time in minutes (/60) = annual burden hours*):

Category of Respondent	No. of Respondents	Participation Time	Burden
State, tribal, local, or community human services program staff [no change from original submission]	40	45 minutes	30 hours
Program participants (individual interviews)	34	45 minutes	25.5 hours
Program participants (small group interviews)	16	90 minutes	24
Total	90	-	79.5 hours

BURDEN COST COMPUTATION

Category of Respondent	No. of Respondents	Hourly Rate	Response Time (hours)	Total
State, tribal, local, or community human services program staff [no change from original submission]	40	\$23.28	.75 hours	\$698.40
Program participants (individual interviews)	34	\$15.00	.75 hour	\$382.50
Program participants (small group interviews)	16	\$15.00	1.5 hours	\$360
Total	90		79.5 hours	\$1,440.90