

## Supporting Statement Part A

### 0985-New ACL Generic Clearance for the Collection of Qualitative Research and Assessment

#### A. JUSTIFICATION

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

[Executive Order 12862](#) directs Federal agencies to provide service to the public that matches or exceeds the best service available in the private sector. The Administration for Community Living (ACL) at the Department of Health and Human Services (HHS) is requesting a generic clearance for purposes of conducting qualitative research to gain a better understanding of emerging issues related to ACL's grantees, service providers, and programs; develop future intramural and extramural research projects; and to ensure HHS and ACL leadership, programs, and staff can obtain timely and relevant data and information. ACL defines qualitative feedback as information that provides useful insights on perceptions and opinions but are not statistical surveys that yield results that can be generalized beyond the population of study.

This collection of information is necessary to enable ACL to receive feedback in an efficient, timely manner, in accordance with our mission to maximize the independence, well-being, and health of older adults, people with disabilities, and their families and caregivers. ACL implements critical disability and aging programs, serves as the advisor to the HHS Secretary on disability and aging programs, works with other HHS agencies, Departments and the White House on disability and aging issues, and engages a range of disability and aging partners to inform program development, improvement, and implementation. Integral to this role, ACL conducts research and evaluation studies to measure the needs, barriers, and facilitators for ACL programs.

Qualitative research, evaluation, and assessment are the main objectives of the activities included in this clearance. The goal of developing these activities is to identify emerging issues and research gaps to ensure the successful implementation of ACL programs. The participants may include subject matter experts appropriate to the question of interest; national, state, and/or local representatives; individuals from aging and disability networks; human service, behavioral health, and healthcare providers; individuals from tribal communities; and/or representatives of other organizations appropriate to the question or questions of interest.

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

The information collected for qualitative research, evaluation, and assessment will be used by ACL to inform decisions, develop future intramural and extramural research and evaluation projects, and to inform emerging issues for HHS and ACL leadership, programs, and staff in support of program improvement.

ACL conducts many types of evaluation and research activities, and this generic clearance will allow more timely data and information collections, potentially lower the cost of some evaluations given the time spent on information collection packages by ACL staff and contractors, and obtain diverse perspectives on public health, human service, and health care issues pertaining to ACL's constituents while still maintaining transparency.

Additionally, the generic clearance should allow ACL and its constituents to better understand and identify emerging issues and promising practices by innovative programs or organizations funded by ACL. The data and information collected under this clearance will be published if it is of methodological interest, if analysis suggest more study is necessary, or findings should be shared with ACL constituents or partners for review, further inquiry or study, or to ensure transparency about the research ACL is conducting. Findings will be published with appropriate limitations regarding the inability to generalize without appropriate sampling, and any other limitations based on the information collected.

ACL will collect, analyze, and interpret information gathered through this generic clearance to identify strengths and weaknesses of current programs, policies, and services. Under this clearance a variety of qualitative methods will be used, and the exact nature of the questions and samples will be determined as appropriate. ACL expects that questions may include but not be limited to issues related to health and human services issues relevant to ACL's constituents, partners, and grantees; workforce issues impacting older adults or people with disabilities; or evaluation or research questions related to older adults and/or people with disabilities. The qualitative methods employed will vary based on the issue being examined; however, ACL expects this generic mechanism, will support key informant interviews, focus groups, and surveys the most. The information collected will provide insights into perceptions, experiences and expectations; provide an early warning or serve as a barometer of emerging issues; or focus attention on areas where communication, training or changes in operations might improve delivery of services or program implementation for ACL's grantees and programs. These collections will allow for ongoing, collaborative, and actionable communications between ACL and its grantees, partners, and constituents. If this information is not collected, feedback from will be unavailable or available in a very limited way (fewer than ten respondents), or information may take too long to collect so as to no longer be relevant. ACL hopes this mechanism will improve understanding of issues relevant to ACL and our grantees and inform further evaluation, research, or analysis.

The Agency will only submit a collection for approval under this generic clearance if it meets the following terms of usage:

- Information gathered will be used for generating and identifying emerging issues and research gaps to ensure successful implementation of ACL programs. Some information may not be for release outside of the agency; however, if information is released or published, procedures outlined in Question 16 will be followed;
- Information gathered may not directly inform influential public policy decisions as defined by OMB. Information may inform the development of ACL's future intramural and extramural research projects, evaluations, or other statistically valid analyses, which could in turn inform influential public policy decisions<sup>1</sup>;
- Information gathered will yield qualitative information; the collections will not be designed or expected to yield statistically reliable results or used as though the results are generalizable to the broader population;
- The collections are voluntary;

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<sup>1</sup> As defined in OMB and agency Information Quality Guidelines, "influential" means that "an agency can reasonably determine that dissemination of the information will have or does have a clear and substantial impact on important public policies or important private sector decisions."

- The collections are low-burden for respondents (based on considerations of total burden hours, total number of respondents, or burden-hours per respondent) and are low-cost for both the respondents and the federal government;
- The collections do not raise issues of concern to other federal agencies;
- Any collection is targeted to the solicitation of opinions from respondents who have experience with the program or may have experience with the program in the near future; and
- With the exception of information needed to provide remuneration for participants of focus groups and cognitive laboratory studies, personally identifiable information (PII) may be collected only to the extent necessary and is not retained.

If these conditions are not met, the Agency will submit an information collection request to OMB for approval through the typical PRA process.

To obtain approval for a collection that meets the conditions of this generic clearance, a standardized form will be submitted to OMB along with supporting documentation (e.g., a copy of the focus group guide). OMB will respond to the submission with questions or approval within 14 business days, or as appropriate given the nature of the submission.

The types of collections that this generic clearance covers include, but are not limited to:

- Interviews
- Small discussion groups
- Focus Groups
- Questionnaires
- Other qualitative methods: other qualitative methods that ACL typically uses such as, document studies, performance assessments, and case studies.

ACL's Office of Performance and Evaluation will serve as reviewers for this generic clearance and will conduct an independent review of each information collection to ensure compliance with the terms of this clearance prior to submitting each collection to OMB.

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

ACL does its best to ensure we are requiring the least amount of burden when collecting information from the public. To the extent possible, we always strive to collect information electronically and/or use online collaboration tools to reduce burden unless other means provide more accessibility for a person or persons with a disability.

### **4. Efforts to Identify Duplication and Use of Similar Information**

ACL collaborates and coordinates routinely with all parts of HHS and other federal agencies. We do our best to ensure no similar data are gathered or maintained by other parts of HHS or are available from other sources known to us. To the extent possible, ACL collaborates with internal and external partners to ensure there is not duplication of information collected. This information collection does not duplicate any other qualitative research methods being conducted by ACL or at HHS in general to our knowledge.

This clearance will provide a more efficient means for conducting more rigorous qualitative research in support of ACL's programs. To the maximum extent possible, we will make use of previous information by reviewing results of previous qualitative research projects before we attempt to revise interview guides, questionnaires, and other tools using additional field work sought under this clearance.

**5. Impact on Small Businesses or Other Small Entities**

Small business or other small entities may be involved in these efforts, and ACL will minimize the burden of information collections approved under this clearance by sampling, asking for readily available information, and using short, easy-to-complete information collection instruments whenever possible.

**6. Consequences of Collecting the Information Less Frequent Collection**

This clearance will involve the use of qualitative research to inform evaluation, research, and assessments for issues that impact ACL's grantees, constituents, and partners. Currently, ACL has no means to conduct qualitative research outside the typical process for OMB approval of information collection requests, which can take between six months to a year. As ACL and many others have learned during the pandemic, we need the ability to speak with our grantees more quickly and systematically in order to respond, reflect, and change based on the current environment. Currently, ACL is severely limited in its ability to solicit feedback from broad and diverse experts, grantees, and partners in a timely way, which impacts our ability to provide up-to-date information to our grantees, our networks, and HHS and ACL leadership.

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

There are no special circumstances. The information collected will be voluntary and will not be generalizable.

**8. Comments in Response to the Federal Register Notice/Outside Consultation**

In accordance with 5 CFR 1320.8(d), a 60-day notice for public comment published in the *Federal Register* (Vol. 88, No. 32 pages 10121-10122) on Thursday, February 16, 2023. No public comments were received.

A 30-day notice for public comment published in the *Federal Register* (Vol. 88, No. 93 page 30981) on Monday, May 15, 2023.

**9. Explanation of any Payment/Gift to Respondents**

ACL will not provide payment or other forms of remuneration to respondents of its various forms of collecting feedback. If it becomes evident that remuneration is necessary, ACL will provide \$40 or less per respondent for in-person information collection, ACL will include a statement to this effect and any other associated documentation as necessary in information collection requests under this mechanism. If evidence suggests that it is necessary to provide remuneration in excess of \$40 per respondent, ACL will provide a statement to this effect and will provide justification in the form of empirical evidence that the specified remuneration is necessary.

**10. Assurance of Confidentiality Provided to Respondents**

ACL does not anticipate the Privacy Act will apply to any of our data collections under this generic mechanism. If the Privacy Act applies to a collection, ACL will provide a Privacy Act statement, SORN, or any other associated documentation as necessary. If a confidentiality pledge is deemed useful and feasible, the Agency will include a pledge of confidentiality that is supported by authority established in statute or regulation, that is supported by disclosure and data security policies that are consistent with the pledge, and that does not unnecessarily impede sharing of data with other agencies for compatible confidential use. If the agency includes a pledge of confidentiality, it will include a citation for the statute or regulation supporting the pledge. We believe that most of the information collections under this mechanism will not collect personally identifiable information or information of a personal or sensitive nature.

**11. Justification for Sensitive Questions**

ACL does not anticipate questions of a personal or sensitive nature will be asked. If there are questions of a sensitive nature, ACL will outline our approach to ensuring the best way to ask these questions.

**12. Estimates of Annualized Hour and Cost Burden**

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours (5,043) requested, and the anticipated number of respondents (10,086) are based on the number of qualitative information collection requests (ICRs) that were approved by OMB currently at ACL. Out of the total ICRs at ACL, we estimated that that 30% of them have a qualitative research component. We used this information to develop the annual burden estimate below. Therefore, we estimate that over the requested period for this clearance (3 years) and approximately 30,258 respondents and 15,129 burden hours will be needed.

**12A. Estimated Annualized Burden Table**

Type of respondent	Form	Number of respondents	Number of responses per respondent	Average burden hours per response	Total burden hours
ACL Program Recipient, Partner, or Key Informant	Qualitative Research	10,086	1	.5	5,043

**13. Estimates of other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs**

No costs are anticipated to respondents.

**14. Annualized Cost to Federal Government**

The anticipated cost to the federal government is approximately \$833,333 annually, for a total of \$2.5 million over the period of three years. These costs are comprised of operational expenses (e.g., equipment, overhead, printing, and support staff), contractor payments and any other expense that is necessary to collect the information approved under this generic clearance.

**15. Explanation for Program Changes or Adjustments**

This is a new information collection request.

**16. Plans for Tabulation and Publication and Project Time Schedule**

Information collected under this generic clearance should provide useful information, but it will likely not yield data that can be generalized to the overall population. Findings may be disseminated when appropriate, strictly following the HHS "Guidelines for Ensuring the Quality of Information Disseminated to the Public," and will include specific discussion of the limitation of the qualitative results discussed above. ACL will adhere to the transparency principle of its [Evaluation Policy](#) and release information and data as is appropriate and feasible to the extent practicable. For information that ACL may not make readily public (for example any information that could identify study participants if confidentiality has been assured), ACL will comply with those requests as appropriate.

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

We are not requesting an exemption.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

These activities comply with the requirements in 5 CFR 1320.9.