

Diaper Distribution Demonstration and Research Pilot Baseline Data Collection

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) Office of Community Services (OCS) awarded grants for the new Diaper Distribution Demonstration and Research Pilot (DDDRP) in September 2022. This is a brand-new program and grant recipients will be launching enrollment, and related data collection in the next month. OCS currently seeks approval to collect information for the DDDRP at the start of enrollment and at follow-up.

Background

As this is the first-ever federal diaper pilot, OCS does not have community-level data on diaper need. We have evidence of national need – one in three U.S. families doesn't have enough diapers to keep their child clean and dry—however, we do not have any data on diaper need in the persistent poverty communities that we serve. This initial data collection has given our office a clearer picture of the actual need and allow us to see if it is on par with the national data or if the communities we serve are disproportionately impacted. This information has been necessary to provide us an understanding of community-level need, so that we can adequately respond.

Additionally, ACF is planning to continue this work through an implementation study of the DDDRP in December 2023 (pending Office of Management and Budget (OMB) approval of an upcoming, related information collection request specific to that evaluation). The initial data collection proposed has been paramount to ensuring we have accurate, baseline data for all the individuals enrolled in the diaper pilot so we can determine how to structure the full evaluation to best highlight if the pilot really had an impact on beneficiaries' wellbeing. The data have also been used to address grant recipients' requests for on guidance how to standardize their baseline data collection efforts efficiently and effectively, ahead of the full federal implementation evaluation as it will provide ACF with necessary information to standardize data collection methods and metrics across grant recipients, partner organizations, and program beneficiaries.

Collecting this information during initial enrollment to inform ACF planning is important as it allowed us to gather pertinent information from partners and beneficiaries at the time of enrollment, which was the least burdensome effort and helped avoid challenges with individuals having to recall information later.

Currently, ACF is hoping to collect the same information about diaper need at follow up. Collecting this information again at follow up will enable our office to engage in continued program assessment activities and provide us with a preliminary understanding of the changes in participant diaper need over time at a subset of grant recipient sites. Additionally, we do not intend to explore changes in household income or child diaper size, so we have deleted the related two items from the current survey.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Use

This information collection request includes two surveys and one interview designed to collect information to inform OCS's internal planning around programming and supports provided to these new programs, and to inform planning for an upcoming evaluation to be conducted by the ACF Office of Planning, Research, and Evaluation (OPRE)¹

Specifically, the information collected is meant to fulfill the following purposes:

1. Collect demographic data and assess baseline, community level diaper needs from beneficiary families.
2. Standardize data collection metrics across grant recipients and partner organizations as they prepare to enroll families in their diaper programs.
3. Gather initial information about individuals enrolling in the diaper pilot to inform the development of the full federal implementation evaluation.
4. Collect information at a second time point to measure beneficiary experiences related to diaper need over time.

The intended uses of the results include the following:

1. Provide initial program data for OCS's internal planning purposes. This is particularly important given that the full federal evaluation will not begin until the spring of 2023 but grant recipients will start providing services within the next few weeks.
2. Inform the full federal research study on the implementation of the first-ever federally funded diaper distribution program, for planning purposes as the finalize plans for data collection.
3. Ensure the research study has baseline and follow up data that are current and reflect the state of the partner organizations and the diaper need of the beneficiaries at the beginning and end of the diaper pilot. This will inform the design of the study.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Obtaining input on the development of program performance measures (PM) from grantees or experts in a relevant field.
- Obtaining feedback about processes and/or practices to inform ACF program development or support.
- Development of learning agendas and research priorities.

Guiding Questions

This request includes one survey created by OCS to fulfill the purposes and uses described above. Table A1, below provides more detail about the instrument.

The **Beneficiary Survey** (Instrument 1) was designed to address the following questions.

¹ Information collection requests related to this evaluation will be submitted to OMB, as appropriate when the Paperwork Reduction Act applies.

- What are the demographics of the families that are participating in the diaper pilot?
- How frequently do families with low incomes experience diaper need?
- How do families with low incomes problem solve around their diaper need (i.e., do they borrow from a friend, make their supply stretch, etc.?)

Processes for Information Collection

The data will be collected by OCS in partnership with the DDDRP grant recipients. OCS program managers and program specialists will schedule virtual interviews with each partner to administer the partner organization interview instrument. OCS staff will also work with partner organizations to socialize the beneficiary survey and support partner organizations in ensuring they can collect baseline enrollment information from program participants. OCS will put the beneficiary survey in an electronic collection system (i.e., Survey Monkey) and share the link with the partner organizations via email. The partner organizations will administer the survey electronically to beneficiaries. OCS will automatically have access to survey results via the electronic collection system, reducing the burden on partner organizations needing to send the information back to the federal office.

Table A1

<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Instrument 1: Beneficiary Survey	<p>Respondents: Direct beneficiaries of diapers and diapering supplies funded by the Diaper Distribution Demonstration and Research Pilot</p> <p>Content: Diaper need assessment and demographic data collection</p> <p>Purpose: (1) Gather baseline demographic data on participating families; (2) assess diaper need prior to being enrolled in the pilot and after several months of service at the end of the pilot</p>	<p>Mode: Survey</p> <p>Duration: 10 minutes</p>

A3. Improved Information Technology to Reduce Burden

Surveys will be completed and submitted electronically to reduce collection burden. This will allow data to be sent efficiently to the federal office via a secure electronic mailing system.

A4. Efforts to Identify Duplication

There are no similar data sets or collections available as this is the first ever federally funded diaper distribution program. There are no other federal agencies that supply or coordinate the distribution of diapers to families with low incomes. OCS has consulted peer-reviewed research on the implementation and impact of other diaper distribution programs to inform this data collection. OCS and OPRE are collaborating on this work to ensure information collections related to DDDRP do not duplicate efforts, but instead increase utility and government efficiency through the related efforts.

For the follow-up survey, beneficiaries will be asked to respond to the same demographic questions they answered when they completed the survey at intake. This duplication is necessary to ensure that the same adult responded to the intake and follow-up surveys. The demographic information will also be used to identify children as a multi-child household may not list children in the same order at intake and follow-up.

A5. Involvement of Small Organizations

No small organizations or businesses will be involved in this data collection.

A6. Consequences of Less Frequent Data Collection

Respondents at a subset of grant recipient sites will be asked to complete the Beneficiary Enrollment Survey (Instrument 1) a second time. If the survey is not administered a second time, OCS will not be able to collect data on beneficiary experiences after several months of services, which will hamper OCS' ability to monitor and assess the program.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and 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 request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

Consultation with Outside Experts

No consultations have taken place with experts outside of the project team.

A9. Tokens of Appreciation for Respondents

OCS proposes providing non-monetary tokens of appreciation such as books, baby toys, baby dental supplies or similar items to beneficiaries that participate in the survey data collection. OCS would like to provide these non-monetary tokens of appreciation to families with low incomes to thank them for taking the time to complete the beneficiary enrollment survey. Families with low incomes are often surveyed, assessed, and asked to complete forms without any acknowledgment of their time. OCS would like to ensure the participating families know that their time is appreciated. OCS will work closely with partner organizations, who have direct

relationships with the beneficiaries, to determine which tokens of appreciation will be most appropriate.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. The federal office complies with all Federal and Departmental regulations for private information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.

To enhance the utility of Instrument 1 (Beneficiary Enrollment Survey) for grant administration and research planning, the survey will include a unique identifier for each adult respondent. OCS will support grantees to generate unique identifiers that are a new, nonsensical numbers (i.e., not reflecting any identifying information such as social security number). OCS will then share back participant-level data with grant recipients, and the grant recipients will have the ability to add the participant-level data collected from Instrument 1 to their internal data systems.

Additionally, grant recipients could then provide participant-level data files to the evaluators that link baseline data on measured outcomes, service delivery, and subsequent measures of the same outcomes. Pending separate OMB approval of a forthcoming information collection for the evaluation, information could be used to inform priorities for a future impact study. For example, the diaper distribution evaluation literature is limited, thus little is known about which outcomes to prioritize for an impact study.

OCS would not have access to the unique identifier coding system held by each grant recipient. Thus, neither ACF nor evaluators would be holding any Personally Identifiable Information.

A11. Sensitive Questions

OCS is collecting two data points that may be considered sensitive information. First, OCS is collecting gender for both caregivers and children enrolled in the DDDRP. Our office collects demographic data, including gender, in both our Low Income Home Energy Assistance Program (LIHEAP) and Low Income Household Water Assistance Program (LIHWAP) quarterly reports (OMB#: 0970-0589 and OMB #: 0970-0578, respectively). Thus, OCS intends to include gender in this data collection to ensure we standardize demographic data collection across all our programs.

Second, OCS intends to collect information about the disability status of the child receiving diapers. OCS is interested in disability status because our office includes the Social Services Block Grant (SSBG), which provides funding support for individuals with disabilities. Thus, understanding the disability status of the children served in the DDDRP will allow OCS to breakdown service silos across program offices and target additional funding support through SSBG.

If a respondent does not feel comfortable answering these or any other question, all questions include the option “prefer not to share.”

A12. Estimation of Information Collection Burden

Burden Estimates

Instrument 1 – Beneficiary Enrollment Survey: There are 14 grant recipients, and there will be 21 grant recipients by September 2023. Based on performance progress reports and current beneficiary enrollment survey data, grant recipients are serving an average of 250-300 beneficiaries per program. Thus, we estimate distributing the survey to about 5,250 potential respondents. As this is an enrollment survey, OCS only anticipates an 80% response rate, which means there will reasonably be about 4,200 actual respondents. The project team estimates that it will take each respondent about 10 minutes to complete the survey.

Beneficiaries at a subset of grant recipients will then be asked to complete the survey at a second point in time. We estimate 11 grant recipients will participate in the follow-up data collection. Based on applications, grant recipients estimated serving an average of 250-300 beneficiaries per program. Thus, we estimate distributing the survey to about 2,750 potential respondents. OCS anticipates an 80% response rate because not every beneficiary will respond to the survey. This means there will reasonably be about 2,200 actual respondents. The project team estimates that it will take each respondent about 10 minutes to complete the survey.

Cost Estimates

The respondents to the Beneficiary Enrollment Survey (Instrument 1) will be individuals and families with low incomes living in seven different states across the country. OCS used the average state minimum wage across the country as the wage rate, which is \$9.98 per hour.

Source: [2022-2023 Minimum Wage Rates by State \(laborlawcenter.com\)](https://laborlawcenter.com/2022-2023-Minimum-Wage-Rates-by-State/)

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Beneficiary Enrollment Survey - Intake	4,200	1	.167	701.4	\$9.98	\$6,999.97
Beneficiary Enrollment Survey – Follow-up	2,200	1	.167	367.4	\$9.98	\$3,666.65
Total Burden and Cost Estimates:				1,068.8		\$10,666.62

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$12,900. This sum reflects federal staff time to send out the survey instruments, complete interviews, administer data collection, and analyze data. The average salary of the staff working on this program is a GS12, which is compensated at an average wage rate of \$89,834 annually, \$43 hourly. It is anticipated that federal staff will spend about 300 hours on this project.

A15. Change in Burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Data collection will begin after OMB approval. It is anticipated that data collection will take about twelve weeks (over two waves). After data collection, data analysis will take about four to six weeks. In addition, we will share raw data with the federal evaluation contractor.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.

Attachments

Instrument 1 – Beneficiary Enrollment Survey