

# **Office of Head Start Program Information Report Data Quality Focus Groups**

**Formative Data Collections for Program Support**

**0970 – 0531**

## **Supporting Statement**

### **Part A - Justification**

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Submitted By:  
Division of Data and Improvement  
Administration for Children and Families  
U.S. Department of Health and Human Services

4<sup>th</sup> Floor, Mary E. Switzer Building  
330 C Street, SW  
Washington, D.C. 20201

## **A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to conduct focus groups and interviews with staff from Head Start programs and Head Start Training and Technical Assistance (TTA) providers to learn about the methods that the Office of Head Start (OHS) can use to support the collection and reporting of high-quality data on the Program Information Report (PIR) (OMB #: 0970-0427). The ACF Office of Planning, Research, and Evaluation (OPRE) Division of Data and Improvement (DDI) and OHS are collaborating to improve OHS data quality.

### ***Background***

The PIR provides comprehensive data on the services, staff, children, and families served by Head Start and Early Head Start programs nationwide. All grant recipients and delegates are required to submit a PIR for Head Start and Early Head Start programs. The PIR is an important source of descriptive and service data for the Head Start community, their partners, Congress, and for the public. PIR data is compiled for use at the federal, regional, state, and local levels.

As a part of this work, ACF is gathering feedback from programs that submit PIR data and associated staff who support these programs. This feedback will inform how OHS provides support for the PIR data collection, such as with data validation rules in the PIR submission data system, forms, user guides, and FAQs. Ultimately, the feedback will be used to identify strategies to improve the quality of PIR data.

### ***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***

Information from the focus groups will be used to understand staff experiences with current PIR practices; perceptions of PIR data quality; challenges related to collecting, maintaining, and submitting high-quality data; and needs related to support from OHS.

Focus group findings will be used for internal program improvement purposes. This collection is intended to improve OHS decision-making, program support, and support for relationships with those who use PIR data. By undertaking this data collection activity, it is intended that OHS can (among other possibilities):

- Improve existing resources for the PIR
- Improve data system validations used during PIR submission
- Identify new methods or processes for collecting high-quality PIR data
- Ultimately, improve the quality of PIR data

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

- Delivery of training or technical assistance and/or workflows related to program implementation or the development or refinement of program and grantee processes.
- Planning for provision of programmatic T/TA.
- Obtaining feedback about processes and/or practices to inform ACF program development or support.

### ***Processes for Information Collection***

ACF will collect information through a series of semi-structured focus groups, with training and TA providers (1 focus group) and Head Start program local staff (2 focus groups with program directors, 2 focus groups with data coordinators). Focus groups will be held via Zoom. Two facilitators will use a semi-structured interview protocol that includes a scripted introduction and consent, high-level questions, detailed probes for specific areas, and, in some cases, polls for quick information gathering activities.

### **A3. Improved Information Technology to Reduce Burden**

All information will be gathered electronically. The focus groups will be scheduled and held virtually, and, pending participant consent, will be recorded. The recordings will be transcribed to ensure accuracy and completeness. Virtual polls will be used during the focus groups to gather feedback from participants in addition to group discussion.

### **A4. Efforts to Identify Duplication**

To date, there have not been efforts to solicit information about the methods that OHS uses to support PIR data collection, and how these may positively impact the provision of high-quality data from Head Start programs. While informal conversations about data supports and data quality may take place, this will be the first instance of structured feedback gathered from staff in multiple roles; the collection of this information is new and unique.

### **A5. Involvement of Small Organizations**

To reduce potential burden on all focus group participants, which may include small organizations or businesses, the focus groups will be held at a time during business hours during which the participant indicates they are available. Participants will be informed on multiple occasions that their participation in focus group is voluntary.

### **A6. Consequences of Less Frequent Data Collection**

This is a one-time data collection.

### **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 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 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, which consists of federal staff and contracted subject matter expert support.

## **A9. Tokens of Appreciation for Respondents**

No tokens of appreciation for respondents are proposed for this information collection.

## **A10. Privacy of Respondents**

This request includes the collection of basic personally identifiable information (name, job title, organizational/institutional affiliation) for the purpose of 1) contacting participants for recruitment in focus groups, 2) following up with participants if clarification is required for their comments, such as verifying the accuracy of transcripts. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Focus group participants will be asked if they agree to being recorded. Once recorded, focus groups will be transcribed. Transcripts will be reviewed for accuracy, and once verified, recordings will be securely destroyed. Names will be removed from the transcript and replaced with unique identifiers. Transcripts will be maintained until conclusion of the project; at which time they will be securely destroyed. Report content will not be linked to individuals and will prevent respondents being identified, for example, due to a title or role that few hold, as much as possible.

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. ACF 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.

## **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

## **A12. Estimation of Information Collection Burden**

### ***Burden Estimates***

Selection of potential focus group participants will be made with input from OHS staff who have knowledge of the availability and experience of potential participants; burden estimates are based on feedback from program office staff and OPRE subject matter experts. Invitations will be made to a select number of TTA and local program staff with the goal of conducting one focus group with TTA providers, two focus groups with program director-level local program staff, and two focus groups with data coordinator-level local program staff.

We estimated burden for focus group participation based on commonly accepted focus group practices, including considering the number and types of questions asked during focus groups, time allocated for effective discussion, and size of focus group that allows for effective discussion. Each focus group will be capped at 8 participants and focus groups will be 90 minutes in length with 8-10 substantive discussion topics. There will be no burden to participants outside their participation in focus groups. Estimated burden for participants is reported in Table A12.

### ***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job codes as follows:

1. **Focus Group Protocol for Training and TA Staff instrument:** Social Scientists and Related Workers, All Other [19-3099]
  - a. Wage data from May 2022 is \$45.46 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$90.92.
2. **Focus Group Protocol for Local Staff – Program Directors instrument:** Social and Community Service Managers [11-9151]
  - a. Wage data from May 2022 is \$38.13 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$76.26.
3. **Focus Group Protocol for Local Staff – Data Coordinators instrument:** Community and Social Service Specialists, All Other [21-1099]
  - a. Wage data from May 2022 is \$24.82 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$49.64.

[https://www.bls.gov/oes/current/oes\\_stru.htm](https://www.bls.gov/oes/current/oes_stru.htm)

Table A12. Estimated annual and total burden and cost

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
Focus Group Protocol for Training and TA Staff	16	1	1.5	24	\$90.92	\$2,182.08
Focus Group Protocol for Local Staff – Program Directors	16	1	1.5	24	\$76.26	\$1,830.24
Focus Group Protocol for Local Staff – Data Coordinators	16	1	1.5	24	\$49.64	\$1,191.36
<b>Total Burden and Cost Estimates:</b>				<b>72</b>		<b>\$5,203.68</b>

**A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

**A14. Estimate of Cost to the Federal Government**

It is anticipated that contract staff will spend 51 hours on this project at an estimated cost of \$4,636.92. This estimate includes time required to analyze program data for recruitment, recruit and schedule individual programs for participation, administer focus groups with two co-facilitators, and code and analyze transcripts. The cost for contract staff was calculated using the Bureau of Labor Statistics (BLS) job codes for Social Scientists and Related Workers, All Other [19-3099]. Wage data from May 2022 is \$45.46 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$90.92.

**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 and is expected to take place over 3 months. Information collected during the focus groups will be used to inform ACF program improvement activities.

**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**

Focus Group Protocol for Training and TA Staff

Focus Group Protocol for Local Staff (used for both Program Directors and Data Coordinators)