

Low Income Household Water Assistance Program (LIHWAP) Water Landscape and Equity Research

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) at the U.S. Department of Health and Human Services (HHS) seeks approval for the collection of interviews (qualitative) and survey (quantitative) data from water service providers.

Background

The Low Income Household Water Assistance Program (LIHWAP) is the first federal water assistance program. As such, there is no cohesive base of data that describes the training and technical assistance needs of the states, tribes, and territories that it serves. Additionally, there is a need to bring together information about the water poverty landscape from existing sources to create one cohesive picture of what water access and challenge areas look like. LIHWAP reporting data captures essential data about program implementation information from grant recipients, but it is necessary to build evidence around the intersections of poverty and the water landscape to better understand how federal programs are meeting the needs of families and communities and to help the Office of Community Services (OCS) LIHWAP team ensure we are providing the training, technical assistance (T/TA), and other forms of support necessary for grant recipients to succeed. This data collection will help federal authorities and grant recipients alike understand water poverty and how to ensure equity in LIHWAP implementation. Much of the data required for this analysis are hard to access. Water and wastewater utility data are not uniformly collected and are generally not publicly available. This project presents the unique opportunity to collate and unify these 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

The purpose of this information collection is to gain a deeper understanding of the context of LIHWAP for low-income households, water service providers and communities. The information collected will provide a foundational understanding of water poverty and the household costs associated with clean water access in states, territories, and tribes in the United States. Research will also provide an understanding of the challenges water service providers have faced in implementing LIHWAP. Information will be gathered through interviews and surveys with water and wastewater service providers, including both those who have and have not participated in LIHWAP. This information will be used to support LIHWAP grant recipients by identifying areas where additional T/TA is needed, helping the OCS team deliver TA, helping grant recipients identify target populations for spending remaining LIHWAP funds before the end of FY2023, and developing future research and programmatic priorities. In addition, collecting information from service providers who do not participate in LIHWAP will aid grant recipients through helping to bring new providers into the program (or, at a minimum, helping more providers become aware of the program) and through learning about how challenges experienced by providers are addressed in a wide range of contexts across the

country. We will also be able to generate new research priorities and agendas for water and poverty-related programming. Without the proposed data collection, it will be much more challenging to place LIHWAP in the context of the broader water utility landscape.

The information we collect through this formative data collection will help inform LIHWAP activities, especially as they relate to providing grant recipient support, and will be shared (in aggregate) on the LIHWAP data dashboard to provide valuable information to both grant recipients and ACF.

- The LIHWAP dashboard provides grant recipients with access to LIHWAP reporting gathered through the LIHWAP Performance Measures (OMB #0970-0578). The addition of aggregate data from this request will benefit grantees by giving them context on existing information. Information regarding the water landscape of the U.S. along with water service providers best practices will allow grantees to strengthen their programs and make adjustments to better serve water service providers and households.
- The information available on the LIHWAP data dashboard will help inform how ACF can better provide support to program grant recipients and help inform research priorities and agendas in the future related to water access and poverty for ACF.

Our primary intended method of dissemination is via the LIHWAP data dashboard. This will allow grantees and other stakeholders to have convenient access to the information. We may also share this information through presentations, infographics, project specific reports, and through online communication with grant recipients and other federal leadership and staff. We would like to share findings with grantees in several ways so that it is accessible and helpful to them. We would also like to share findings with other stakeholders, including federal leadership and staff, through multiple different means to ensure that the findings are observed. In sharing findings, we will describe the study methods and limitations regarding generalizability and as a basis for policy.

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

- Delivery of T/TA and/or workflows related to program implementation or the development or refinement of program and grant recipient processes. This includes helping the LIHWAP team to understand T/TA needs of grant recipients and to ensure that we are providing the support that they need, as well as helping grant recipients identify key populations or geographic areas that LIHWAP grant recipients should target for spending down their remaining funds prior to the end of FY23.
- Planning for provision of programmatic or evaluation-related T/TA through both interviews and surveys to help identify areas of need for grant recipients.
- Development of learning agendas and research priorities for future water access and equity projects and programs.

Processes for Information Collection

The information collection will be two-fold, including an interview component and an electronic survey component, with standardized surveys that can be accessed through a link. Respondents to both the interviews and surveys will be water service providers who may or may not be participating in LIHWAP. Respondents who participate in LIHWAP will be asked a separate set of questions than those who do not participate in LIHWAP. Interview participants will be asked to participate in a brief (approximately thirty minutes) virtual interview on a day and time that works with their schedule, conducted either by a member of LIHWAP staff or a member of our consulting team (ICF). Survey participants will receive a link to an electronic survey that they can complete on their own time (30 minutes). Responses will be compiled and analyzed by LIHWAP staff and ICF contractors.

A3. Improved Information Technology to Reduce Burden

The information collection will be two-fold, including an interview component that will be conducted virtually and an electronic standardized survey component that will be disseminated via SurveyMonkey link. Interviews will be conducted virtually, either using Teams or an ordinary phone call, to ensure minimal impact on our participants' schedules and time.

The second part of this data collection will involve electronic surveys. Using an electronic survey is the most efficient and error-resistant mode of data collection for the purposes of our quantitative information collection. Use of electronic surveys will reduce burden both for the LIHWAP team as well as for survey respondents, as data processing will be quicker and less prone to error, and respondents can complete and submit surveys without administrative burdens that come with paper surveys like mailing responses back. Use of electronic surveys and records has been shown to reduce administrative burden in multiple areas, including, for example, electronic medical records (Hakes & Whittington, 2008¹) and in digital government (Veiga et al., 2016)².

A4. Efforts to Identify Duplication

All efforts have been made to ensure that we are not collecting already-existing information. We have identified critical gaps in knowledge and determined areas that already have adequate data coverage through our own research and through information gathered from stakeholders in the field. We are confident that we have compiled all information that already is available to us and that we are only requesting the collection of information that is not currently available.

¹ Hakes B, Whittington J. Assessing the impact of an electronic medical record on nurse documentation time. *Comput Inform Nurs.* 2008;26(4):234-41. doi: 10.1097/01.NCN.0000304801.00628.ab.

² Veiga L, Janowski T, Barbosa LS. Digital Government and Administrative Burden Reduction. ICEGOV '15-16: Proceedings of the 9th International Conference on Theory and Practice of Electronic Governance. 2016: 323-326. doi.org/10.1145/2910019.2910107

A5. Involvement of Small Organizations

Some programs involved will be small organizations as the research aims to gather feedback from both large and small utilities to ensure equitable representation. The interview portion of data collection will use virtual meetings to minimize time burdens for respondents. Interview questions have been carefully designed to maximize efficiency and gather the information we need in a short period of time. Participants can schedule interview times based on what works best for their schedules, and no one is obligated to participate.

Some research has shown that the use of electronic correspondence with government and businesses reduces perceived burden for business owners (Arendsen et al., 2014³). Use of electronic surveys in this data collection will minimize the burden on the part of all respondents in this research, including small utility companies. We will provide technical support as needed for all respondents. The electronic surveys will be easily accessible and will not require high technological literacy. The length of the survey will also be as short as possible to still provide the information needed.

A6. Consequences of Less Frequent Data Collection

This request is for a one-time information collection. If LIHWAP receives additional funding and it would be useful to collect updated information about the water landscape, OCS would submit a new information collection request, as appropriate. Without this proposed information collection, OCS and LIHWAP stakeholders will lack context and granularity about the full water landscape analysis. Additionally, we will miss the opportunity to provide targeted T/TA at this critical inflection point in the grant, with the approaching deadline to obligate all funds by the end of fiscal year 2023. This information collection is therefore extremely urgent, as grant recipients have less than one year to obligate their remaining funds.

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

³ Arendsen R, Peters O, ter Hedde M, van Dijk J. Does e-government reduce the administrative burden of businesses? An assessment of business-to-government systems usage in the Netherlands. *Government Information Quarterly* 2014; 31(1):160-169. <https://doi.org/10.1016/j.giq.2013.09.002>

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

Many outside experts have been in contact with the LIHWAP team since its inception to share their thoughts and feedback related to the program. We have had extensive conversations with these experts to ascertain the extent and quality of existing water access and affordability data, and they have helped us identify gaps in existing data and knowledge to ensure that we are not unduly burdening water service providers.

We are also working with two contracting organizations: ICF and Lux. These organizations are assisting with aggregation of publicly available data, research administration, data collection, and report writing. ICF has helped design this information collection by providing expertise in communicating with water and wastewater service providers. This expertise was used to develop questions for both the interview and the survey. Lux brings expertise in communicating with tribal organizations, which also informed the development of survey questions.

A9. Tokens of Appreciation for Respondents

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

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.

We are asking for small amounts of personally identifiable information (PII), including respondents' names, job title, email address and phone number. We are asking for this information to identify respondents so that follow-up will be possible, if necessary. They are asked whether they consent to follow-up to clarify questions about their responses, and they may choose not to consent.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Findings will only be shared in aggregate. The disaggregated information we collect will only be used by internal OCS staff and consultants.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

The average time burden per respondent was calculated for the surveys by multiplying the survey software estimate for time to complete the survey (approximately 15 minutes) by 2 to account for time spent looking up answers to questions. For the interview portion, the interview guide and interview piloting time suggested approximately 30 minutes per respondent.

Cost Estimates

The estimated annual cost to respondents is based on the average hourly salary for office clerks, general, job code 43-9061 based on 2021 Occupational Employment Statistics for Utilities from the Bureau of Labor and Statistics (https://www.bls.gov/oes/current/oes_stru.htm). The base wage is equal to the mean salary of \$18.05 per hour. The base wage was multiplied by two (\$36.10) to calculate wage plus fringe benefits and overhead.

The number of surveys was estimated by the following process:

1. Determined an approximate total number of water service providers based on prior work conducted through LIHWAP: N = 48,839
2. Determined average number of water service providers per state: N = 958
3. Using 95% confidence level, 5% margin of error, z-score calculation $z = (x - \mu) / \sigma$; ideal sample size: N = 382
4. Set goal of N = 500 to account for incomplete responses and responses with other errors

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
Water Utility Affordability Survey	500	1	.50	250	\$36.10	\$9,025
Interviews with Water Service Providers	80	1	.50	40	\$36.10	\$1,444
Total Burden and Cost Estimates:				290	--	\$10,469

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 \$73,188.

The estimated annual cost to the Federal Government is based on the average hourly salary for social and community service specialist, job code 21-0000 based on 2021 Occupational Employment Statistics from the Bureau of Labor and Statistics. The base wage is equal to the mean salary of \$40.66 per hour. The base wage was multiplied by two (\$81.32) to calculate wage plus fringe benefits and overhead. After, this wage was multiplied by 900 hours, which is the estimated burden hours to staff for the collection and analysis of the information.

Staff burden hours were calculated as follows:

Survey:

- Survey dissemination, outreach with utilities: 50 hours
- Data cleaning: .5 hours per survey response x 500 responses = 250 hours
- Data analysis, data visualizations, translation for data dashboard: 100 hours
- Data reporting, report writing: 50 hours

Interviews:

- Interview preparation (.5 hours per interview), conducting interviews (.5 hours per interview), debriefing/notetaking following interview (.5 hours per interview) = (.5 x 80) x 3 = 120 hours
- Codebook development = 80 hours
- Cleaning data (80 hours), coding (80 hours), data verification and cross-checking (40 hours): 200 hours
- Data reporting, report writing: 50 hours

Total staff burden hours: 900

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

We plan for data collection to begin immediately upon OMB approval and to take place over about 2.5 months. A preliminary codebook will be developed based on themes from the interview guide and concepts that the LIHWAP team would like to know more about (deductive), and additional inductive themes will be added based on emergent concepts from the interviews. Interviews will then be coded using this codebook and broad themes across

interviews will be identified. The process of codebook development, coding, and analysis will take approximately 3 months.

As we receive digital surveys from respondents, we will tabulate and clean the data. Analyses will be conducted once we have received all expected responses and will be completed by March 2023. Findings will be summarized and published throughout the spring of 2023. We plan to publish aggregate findings from surveys on the LIHWAP Data Dashboard (online) and share via email with grant recipients. We plan to publish aggregate findings from interviews on the LIHWAP data dashboard and in the LIHWAP Annual Report for use by grantees and other stakeholders. We also plan to use interview findings to inform TA shared with grantees.

Analytical techniques will include imputation as needed to handle missing data, descriptive techniques including t-tests and chi-squared tests to understand the basic qualities of the data across respondents and may include more complex techniques like regression models and spatial analyses to understand how different elements of the survey associate with one another. These findings and limitations to the data will be included in the above-described publications.

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

- Guide for Interviews with Water Service Providers
- Water Utility Affordability Survey