

**To:** Kelsi Feltz  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Juliana Melara  
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Administration for Children and Families (ACF)

**Date:** August 9, 2023

**Subject:** Change Request – Diaper Distribution Demonstration and Research Pilot Baseline Data Collection (OMB #0970-0531)

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This memo requests approval of changes to the approved information collection, Diaper Distribution Demonstration and Research Pilot Baseline Data Collection, approved under the Formative Data Collections for ACF Program Support (OMB #0970-0531).

### ***Background***

In November 2022, the Office of Community Services (OCS) submitted this data collection for Cohort 1 of the Diaper Distribution Demonstration and Research Pilot (DDDRP) with seven grant recipients. In May 2023, OCS awarded funding to an additional seven grant recipients designated as Cohort 2 of the pilot. In September 2023, OCS anticipates awarding another seven grants, which will be designated as Cohort 3 of the pilot. In July 2023, OCS was approved by OMB to continue using Instrument 1: Beneficiary Enrollment Survey and Instrument 3: Waitlist Survey for Cohorts 2 and 3. OCS is submitting this request to add a unique identifier to Instrument 1 to enhance its utility for 1) grant recipients who are administering programs, and 2) federal evaluators who are developing research priorities for a future impact study.

OCS has received feedback from grant recipients of Cohort 1 that Instrument 1: Beneficiary Enrollment Survey has limited utility to them because the survey is completely anonymous. While OCS continues to provide aggregate-level data from this survey to grant recipients, there is no way for grant recipients and their partner organizations to link the results of the beneficiary enrollment survey with participant-level data in their internal data collection systems. Thus, the results are only useful to the federal office, and not to the grant recipients and partners administering the instrument to beneficiary families.

OCS has received similar feedback from federal evaluators who are conducting a process study of the DDDR and developing a plan for future impact study. The study's research questions will require the evaluation to leverage individual level program participant data.

### ***Overview of Requested Changes***

**To enhance utility for both grant program administration and research planning,** OCS proposes two changes to Instrument 1: Beneficiary Enrollment Survey.

- First, OCS proposes to have grant recipients generate a unique identifier that correlates

with each adult participant enrolling in the DDDRP and enter that unique identifier into the instrument. OCS would provide support to grant recipients to ensure they generate unique identifiers that are new, nonsensical numbers (i.e., not reflecting any identifying information such as social security number). OCS would then share back participant-level data with grant recipients, and the grant recipients would have the ability to add the participant-level data collected from Instrument 1 to their internal data systems, thus making the data available to them on the participant level.

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. This information would 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.

- Second, OCS proposes to revise the consent language for the Beneficiary Enrollment Survey to align with its proposed uses.

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 with this change.**

The updated Beneficiary Enrollment Survey (Instrument 1) is included with this request. OCS does not wish to update Instrument 2 or 3 at this time. We have also updated Supporting Statement A to reflect these changes and the current status of data collection.

### ***Time Sensitivities***

We request a response as soon as possible. Cohort 2 of the DDDRP was awarded in May 2023 and they have now had enough time to get their programs started. They are ready to begin enrolling families very soon and need this data collection tool available to them to start collecting beneficiary enrollment data.