Public Access to Diaper Information

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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Submitted By:

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Administration for Children and Families

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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 to survey the grant recipients from Cohorts 2, 3, and 4 of the Diaper Distribution Demonstration & Research Pilot (DDDRP) to better understand and to compile information about how families can receive support through DDDRP. Currently, there is no centralized source for this information. The ACF Office of Community Services (OCS) regularly receives requests from the public about how to access diapers and is unable to answer these requests outside of directing individuals to reach out to a grant recipient near them. Grant recipients in the meantime have taken a wide variety of approaches to circulating information to the public, with some grant recipients posting full information about their programs online and other grant recipients publishing no information.

To ensure this information is easily available in a consistent way, OCS requests from the 22 DDDRP programs information about eligibility requirements and how families can receive diapers from each program. This information will allow OCS to provide consistent information about each program on the OCS website. The public will thus be able to easily see if they are eligible for support from DDDRP, and if so when, where, and how they can receive diapers for their children. While much of this information is already publicly available, it’s not available in a consistent way and this effort will compile the information for individuals seeking information. By surveying the grant recipients and publishing the shared information, OCS will ensure that there is equal information available about all programs and that families do not need to spend hours looking online or making phone calls in order to determine if they are eligible for assistance.

#### *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***

OCS will survey the grant recipients about their eligibility requirements and how families can receive diapers. OCS will then publish this information so as to improve public access to ACF funded programs. Information will be published on the OCS website in a consistent format, based on survey results.

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

* Requesting information about resources, programs, or other ACF services or related activities to provide consolidated public sources of information for those using or interested in ACF funded services.

***Processes for Information Collection***

The program specialist office at OCS will email each grant recipient a link to an online survey. The survey will include a brief introduction about the purposes of the collection, and then will ask the grant recipient to complete 12 short questions about their program’s eligibility, enrollment, and distribution process. All questions will be optional, and grant recipients will be instructed to only provide information that they are comfortable sharing publicly.

OCS will consolidate the information provided into a standard format, such as a flyer. Once completed, the final product(s) will be shared with the grant recipient for final approval before being published on the OCS website. The grant recipients may also choose to use the final published version(s) for their own outreach, if desired.

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

The survey will be completed online, which will allow for the instrument to be administered on any mobile device in addition to a laptop or desktop computer. Once responses are submitted via Survey Monkey, the federal office will automatically have access to the data, eliminating any potential data submission burden on grant recipients.

**A4. Efforts to Identify Duplication**

OCS does not currently collect any information on eligibility or how families can access diapers. Westat is conducting an evaluation of DDDRP that includes questions about how families experience the program, but this evaluation will not be completed for several years and does not collect information for the explicit purpose of increasing public access to the program. Although much of this information can be found publicly, it’s not provided in a consistent manner and is not all available. This one time low-burden data collection will provide the public with consistent information about eligibility requirement and accessing diapers.

**A5. Involvement of Small Organizations**

Not applicable. The grant recipients are non-profit organizations.

**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.

**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, as appropriate. Respondents will be informed of all planned uses of data and that their participation is voluntary. Information will be made public, and respondents will be informed about what will be made public and what information will be kept private. The survey will request that the grant recipient provide their organization’s name but will not ask for any individuals’ names or personal identifiers.

**A11. Sensitive Questions**

There are no sensitive questions in this data collection.

**A12. Estimation of Information Collection Burden**

***Burden Estimates***

OCS estimates that the average time to complete this survey will be a half hour. The grant recipients should have a clear idea of their own eligibility rules and process for distributing diapers, so the majority of the time burden should be filling out the survey. This is a one-time collection. There are currently 14 grant recipients, and another cohort (projected between 7 to 8 grant recipients) will be added in the future.

***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for 21-1099 and wage data from May 2022, which is $22.74 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $45.48.

<https://www.bls.gov/oes/current/oes_stru.htm>

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| --- | --- | --- | --- | --- | --- | --- |
| 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 |
| Diaper Access Survey | 22 | 1 | .5 | 11 | $45.48 | $500.28 |

**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 $860. This sum reflects federal staff time to send out the survey, create public resources, and make sure that each grant recipient approves of their individual resource. 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 20 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**

After receiving the survey answers from a grant recipient, OCS will take two weeks to compile the information into a final product (such as a flyer). The final products proposed for publication will then be emailed to the grant recipient for approval, before being published on the OCS website.

**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**

Attachment A: Diaper Access Survey