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Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Jessica Hale  
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Administration for Children and Families (ACF)

**Date:** October 3, 2024

**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***

The Diaper Distribution Demonstration and Research Pilot Baseline Data Collection was approved on December 1, 2022, for one cohort of grant recipients (“Cohort 1”) and subsequent change requests were submitted and approved between July 2023 and the present to improve the utility of the data collected, to be responsive to feedback from the grant recipients and requests from the independent evaluator of this demonstration program, and to develop a follow-up version of the survey.

This change request serves to reduce the number of items in the follow-up survey and to clarify which grant recipients are using which versions of the survey. Currently, Cohort 1 is using the original baseline survey, as approved in December of 2022. These grant recipients had already collected substantial amounts of data by the summer of 2023 and thus did not implement a change made to request the Unique Identifier version. The majority of Cohort 2 is also using this original version of the survey, with two grant recipients opting to use the Unique Identifier and updated consent language to reflect the addition of the Unique Identifier. All of Cohort 3 is using the Unique Identifier version. OCS plans to launch the follow-up version of the survey with all grant recipients in Cohorts 2 and 3 that are using unique identifiers in fall of 2024. This request also updates burden estimates to reflect observed response rates to date. Note that a full request is currently in process to move this effort under a full request.

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

#### **Overview**

Instrument 1 has been updated to display the consent language and items used across baseline versions of the survey. It includes explanatory text to identify instructions and items that are unique at the cohort level. Instrument 2 has been added to make clear distinctions between the baseline and follow-up administrations of the survey. Finally, on instrument 2, in an effort to reduce burden on respondents, we did a thorough review of questions and identified a number of

items that aren't absolutely necessary at follow-up for utility of the data, so we have removed those questions.

This change request also updates the supporting statements to update the burden estimates, make clear the versions of the survey in use, and to better describe data handling practices and uses.

### **Baseline Survey**

Instrument 1 has been updated to show the versions of the survey that are in use by grant recipients. First, the instrument now displays the response options for all limited response items. Second, this instrument differentiates between the consent language being used for the baseline survey without the Unique Identifier and the consent language being used for the baseline survey with the Unique Identifier. This instrument also makes clear the differences in questions being asked between cohorts, the instructions being provided to beneficiaries completing the survey, and the answer options available to beneficiaries.

### **Follow-Up Survey**

The follow-up survey will be administered to participants of the 9 grant recipients that are using the unique identifier. The follow-up survey (instrument 2) to be launched in November has been reviewed and items were removed that are not expected to show change in a meaningful way (e.g., child's age or race), and are not needed to ensure that the respondent using the diaper ID at follow-up is the same respondent using the ID at baseline (e.g., single-parent status).

Specifically, the follow-up administration removes:

- o Child level
  - Age
  - Race
  - Ethnicity
  - Respondent's relationship to the child
  - Diaper size
  - Special needs status
  - Whether diapers must be provided for any child in childcare
- o Respondent level:
  - Primary language
  - Highest level of education
  - Single parent status
  - Employment in more than one job for respondents who have not reported part-time or full-time employment in the employment item

Additional changes for the follow-up focus on clarifying that the survey is distinct from the baseline to reduce the risk of grant recipients or respondents using the wrong survey form to complete the follow up or enrollment data.

- On the welcome page, the revisions add a note to individuals new to the program that they should ask for a new link to use the enrollment survey.
- On the unique ID page, the revisions add a note under the unique ID entry that participants without the unique ID can stop taking the survey. The results of the follow-up will not be usable without the unique ID entered.

### **Supporting Statements**

Supporting statements A and B have been updated to better reflect current response rates, burden hours, as well as data handling and uses. OCS originally developed estimates of the number of respondents using grant recipient applications. Now that we have observed nearly two years of operations from the first cohort of grant recipients along with response rates from three cohorts, we can more accurately estimate the number of responses. Additionally, we are able to observe average time to completion for surveys through survey platform metrics for instrument 1. Supporting Statements A and B use these observations to update annual and total burden estimates.

Additionally, OCS has updated Supporting Statement A to clarify that data are regularly reported back to grant recipients in the aggregate. As noted in Supporting Statement B, grant recipients regularly use this information to support their operations, and as a result, response rates have climbed substantially. Additionally, in the supporting statements, we clarify the timeline for using learnings from this information collection to finalize a clearance package for an information collection under full review.

### ***Time Sensitivities***

We plan to administer the follow-up survey beginning in November.