

Diaper Distribution Demonstration and Research Pilot Beneficiary Information

**OMB Information Collection Request
0970 - NEW**

Supporting Statement Part A - Justification

December 2024

Type of Request: New

Submitted By:
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services

Summary

The Office of Community Services (OCS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), is requesting approval of a collection to provide information on baseline diaper need for participants served by the Diaper Distribution Demonstration and Research Pilot (DDDRP), as well as on changes in diaper need and family financial security and self-sufficiency after receipt of DDDRPs services. The DDDRPs is the first-ever federal diaper pilot, and research on diaper need and how diaper programs address that need is nascent. This data collection will supply critical information on diaper need and participant outcomes to provide timely information to program administrators at the federal level in addition to program administrators of DDDRPs grant recipients.

OCS has been collecting this information under the Formative Data Collections for ACF Program Support generic information collection (OMB #0970-0531). The formative collection supported the development of two virtual surveys hosted by OCS. The surveys included an enrollment version that was administered before participants took home their first pack of diapers and a follow-up version administered after participants had received diapers for several months.

This information collection will build upon what OCS has learned from the formative collection and feedback received during the 60-day public comment period to continue collecting beneficiary data while transitioning to a new approach led by grant recipients. With this information collection, current grant recipients that are already using the virtual surveys hosted by OCS will continue to use the OCS-hosted enrollment survey for newly enrolling beneficiaries. Grant recipients awarded in fiscal year (FY) 2024 and later will use information they collect from individuals through their enrollment and tracking processes to complete an aggregate report of beneficiary characteristics and outcomes. The aggregate report will serve as a supplement to the Performance Progress Report that is approved under the Generic Performance Progress Reports collection (OMB #0970-0490).

A1. Circumstances Making the Collection of Information Necessary

The Office of Community Services (OCS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), first awarded grants for the Diaper Distribution Demonstration and Research Pilot (DDDRP) in September of 2022. As this is the first-ever federal diaper pilot, OCS does not have community-level data on diaper need. We have evidence of national need—one in three U.S. families does not have enough diapers to keep their child clean and dry—however, we do not have any data on diaper need in the persistent poverty communities that we serve.

OCS piloted a baseline data collection to begin addressing this need for information. The pilot was conducted under the Formative Data Collections for ACF Program Support generic information collection (OMB #0970-0531) and supported the development of two virtual surveys hosted by OCS. The surveys included an enrollment version that was administered before participants took home their first pack of diapers and a follow-up version administered after participants had received diapers for several months.

The pilot's baseline data collection is giving our office a clearer picture of the actual need and allowing us to see if it is on par with the national data or if the communities we serve are disproportionately impacted. This information collection will build upon what OCS has learned from the formative collection and feedback received during the 60-day public comment period to continue collecting beneficiary data while transitioning to a new approach led by grant recipients. Additionally, collecting follow-up data on children and families after they have received services is helping us understand the range of outcomes that children and families experience in the program.

Though there are no legal or administrative requirements that necessitate the collection, the collection is critical to supporting the development of this new program. Information on the characteristics and needs of and outcomes experienced by participants provides critical insights for future iterations of the program and the provision of training and technical assistance. This information also supports performance monitoring so that OCS can work with grant recipients to ensure project success and the effective use of grant funds.

A2. Purpose and Use of the Information Collection

With this information collection, current grant recipients that are already using the virtual surveys hosted by OCS will continue to use the OCS-hosted enrollment survey for newly enrolling beneficiaries. Grant recipients awarded in fiscal year (FY) 2024 and later will use information they collect from individuals through their enrollment and tracking processes to complete an aggregate report of beneficiary characteristics and outcomes. The aggregate report will serve as a supplement to the Performance Progress Report (PPR) that is approved under the Generic Performance Progress Reports collection (OMB #0970-0490). As such, this request includes two instruments, which are summarized in Table A1 below. The first

instrument is the OCS-hosted enrollment survey that grant recipients that were funded in FY 2022 and 2023 will continue to use through the end of the current project period. The second instrument is the reporting form for grant recipients newly funded in FY 2024 and any projects funded with future appropriations. OCS has developed the second instrument to transition from an OCS-led collection to a grant-recipient-led collection based on feedback received during the 60-day comment period.

The continuing enrollment collection for FY 2022-2023 grant recipients will provide information on any changing needs among the populations served as existing programs continue their operations and shed light on new enrollments as current participants age out of the program. OCS has used this information internally as we plan for future operations the provision of training and technical assistance. Additionally, OCS regularly reports baseline data to grant recipients to allow them to adapt their programs to community needs. OCS has regularly conveyed summary statistics about the families that grant recipients are serving (including coping mechanisms, level of scarcity, and demographics) so that grant recipients can better target resources and leverage other resources for the communities served.

The newly developed grant recipient report will collect both enrollment and outcome information. This information will help OCS understand the characteristics of individuals served as the diaper program expands to new regions, as well as how diaper need, child and caregiver health, and family economic security change with the support of the diaper program. OCS will use this information to support program planning and monitoring. OCS will also publish the data on our dashboard and other communications to share information with the public about the results of the demonstration program. The data may also be used by the external evaluators for publications.

Table A1

<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Instrument 1: Beneficiary Enrollment Survey	<p>Respondents: Direct beneficiaries of diapers and diapering supplies from grant recipients newly funded in FY 2022 and 2023 for the DDDRP</p> <p>Content: Diaper need assessment and demographic data collection</p> <p>Purpose: (1) Gather baseline demographic data on participating families; (2) Assess diaper need prior to being enrolled in the pilot</p>	<p>Mode: Survey</p> <p>Duration: 5 minutes</p>
Instrument 2: DDDRP Beneficiary Report	<p>Respondents: Grant recipients newly funded in 2024 and grant recipients receiving funding from future appropriations for the DDDRP</p> <p>Content: Characteristics of children, caregivers, and families receiving diapers through the program; outcomes experienced</p>	<p>Mode: Report</p> <p>Duration: 10 hours</p>

	by families enrolled in the program.	
	Purpose: Document the characteristics of beneficiaries and assess outcomes experienced by beneficiaries.	

A3. Use of Improved Information Technology and Burden Reduction

Instrument 1 is completed and submitted electronically by program beneficiaries. This allows data to be sent efficiently to the federal office via a secure electronic platform. The program office provides regular reports to grant recipients, so that they can use the data.

Instrument 2 will also be submitted electronically by grant recipients. OCS has observed that electronic means for grant recipient reporting facilitates efficient reporting and review for grant recipients and the program office.

A4. Efforts to Identify Duplication and Use of Similar Information

OCS is transitioning to instrument 2 in order to reduce duplication. During the 60-day comment period, grant recipients reported that they needed to collect the information included in the beneficiary survey for their own program operations, so they could effectively work with individual participants. Instrument 2 permits grant recipients to report aggregate data from their own collection of beneficiary data, so beneficiaries are not required to report this information multiple times.

OCS will continue to administer instrument 1 for grant recipients who are already using it to ensure accurate and complete reporting for these projects, so OCS can understand participant needs and characteristics for the full lifecycle of a funded project. Though grant recipients may collect similar information, the anonymity provided by the OCS-led administration would not be matched in a grant-recipient led format. Thus, some of the information may not be reliably tracked over time if OCS were to transition to grant-recipient-led reporting for these grant recipients. For example, the current BES asks questions about diaper-related health issues that beneficiaries may feel uncomfortable reporting directly to service providers.

A5. Impact on Small Businesses or Other Small Entities

No small organizations or businesses will be involved in this data collection.

A6. Consequences of Collecting the Information Less Frequently

Instrument 1 will only be collected once at enrollment for program beneficiaries, which is the minimum collection for this enrollment data. Instrument 2 will be collected semi-annually from grant recipients. As a new program, evidence about diaper distribution is emergent and the program office needs to be able to adapt effectively. Collecting this information annually

would not allow the program office to adjust operations or the provision of training and technical assistance in a timely manner, given a two-year project period.

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

The beneficiary survey was initiated with current grant recipients under the ACF generic information collection for program support (OMB #0970-0531) prior to the publication of Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPD 15; [89 FR 22182](#)). As a result, the race and ethnicity items in instrument 1 were not developed in alignment with the current standards. This request maintains the original items for race and ethnicity on instrument 1 for several reasons. First, continuing with the current items simplifies continued operations of this information collection for our grant recipients as well as ensures reporting is consistent for OCS. Second, grant recipients reported concern with changing items as a challenge for their own use of the data because it will be difficult to aggregate data across time periods and report on the results of their efforts. This instrument is only intended to be used by FY 2022 and FY2023 grant recipients through the end of their project periods—September 30, 2025 for cohorts 1 and 3 and April 30, 2026 for cohort 2. After these project periods close, OCS will retire the OCS-led collection.

Instrument 2 complies with the categories and approach relayed in the SPD-15 reporting standards, but it uses a simple version without sub-categories. OCS requests to use subcategories based on feedback received from grant recipients that caregivers with multiple children face a high burden in reporting demographic information across children. Grant recipients noted that caregivers are often completing enrollment forms with their children in the office, and it is difficult to provide sustained attention to enrollment forms. Reducing the number of categories for reporting reduces that burden for caregivers enrolling their children in the program.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

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 activity. This notice was published on September 27, 2024, Volume 89, Number 188, page 79296, and provided a sixty-day period for public comment. During the notice and comment period, 7 comments were received. Additionally, OCS hosted a listening session on November 7 with grant recipients who are currently using the beneficiary survey. The notes from that session are included with this request (see Attachment A). Finally, OCS has contacted all cohort 4 grant recipients awarded in FY 2024 to discuss feedback from the listening session and how it aligns with their own data collection procedures. Of the 7 grant recipients in this cohort, 4 have scheduled meetings

with OCS.

Several themes emerged from the comments received and listening session with existing grant recipients. The following discussion summarizes these themes and how this revised collection responds to public comment.

Burden

Several comments focused on issues related to burden. Some commenters noted the change in the survey items and the incorporation of a unique identification number was highly burdensome for existing grant recipients. They noted that they had existing data collection processes and mid-stream changes would be difficult for them to implement in the short amount of time remaining for their program. In response, OCS has grandfathered-in the existing instruments that grant recipients awarded in FY 2022 and 2023 use under ACF generic information collection for program support (OMB #0970-0531). Grant recipients provided feedback on other elements of the information collection, but retaining current instruments for these recipients avoids disruption to current operations and addresses concerns related to utility of data with mid-stream changes. OCS agrees that keeping current instruments for current grant recipients will result in reduced burden for sites and higher quality data for these recipients.

Several comments also noted that the burden calculations for the survey are inaccurate. They noted that though some caregivers can complete the survey in 5 minutes, those with several children or needing assistance completing the survey can take up to 10 to 15 minutes. As a result, OCS has increased the burden estimates for the survey to an average of 10 minutes and informed respondents that the instrument may take between 10 to 15 minutes to complete.

Several comments noted that the beneficiary survey as administered by OCS duplicates their own information collection efforts. As a result, they need to field similar questions to families multiple times because they need the information for their own operations and for the OCS survey. Several comments suggested that OCS develop an aggregate report for grant recipients to supply data they are collecting rather than collecting this information separately for OCS. OCS has met with four of 7 grant recipients in cohort 4 to understand whether an aggregate report would be less burdensome given their own data collection. Thus far, grant recipients have indicated that they already administer a survey to participants that collect much of the beneficiary information sought by OCS through this information collection. As a result, OCS is proposing to transition to instrument 2, which is an aggregate report, for cohort 4 grant recipients awarded in FY 2024 and all grants awarded in the future. During the 30-day comment period, OCS will continue to work with cohort 4 grant recipients to refine the items on the aggregate report to minimize burden and strengthen the reporting structure.

Data Utility

Several items related to data utility. Grant recipients made several additional suggestions to improve the beneficiary data and its usefulness for the program. Though OCS is grandfathering in the existing beneficiary survey for cohorts 1, 2, and 3, we can incorporate many of these suggestions into the aggregate report. Several comments pointed to the need to include items that are important for understanding participant experiences in the program, including the quality of the wraparound service referrals, improvements in emotional health, and outcomes that capture the range of improvements related to the array of services beneficiaries might receive. As a result, OCS has reviewed the CSBG reporting outcomes to identify those that might be relevant to the DDDRP and sought to broaden the outcomes collected in instrument 2. Other suggestions focused on the level of sensitivity of the items, such as those that indicate child health issues or those that may identify families as members of marginalized communities. In the aggregate reporting, OCS has reduced the level of detail for sensitive items or removed them. OCS will work with cohort 4 grant recipients during the 30-day comment period to ensure the changes are supportive of their needs and the needs of the communities they serve.

Several comments from grant recipients currently fielding the BES focused on access to the raw data for their own uses. Though OCS provides aggregate data to the grant recipients, in this format, grant recipients cannot conduct their own analyses or validate the data. However, the consent statements on the current instruments that are being grandfathered into this information collection have limitations set on sharing. OCS will work with grant recipients to determine the types of analyses that may benefit their work as the complete the remainder of the project period.

A9. Explanation of Any Payment or Gift to Respondents

OCS does not propose to provide any payment or gift to respondents.

A10. Assurance of Confidentiality Provided to 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. The federal office 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. Justification for Sensitive Questions

OCS is collecting some data points that may be considered sensitive information. This collection requests information about the disability status of the child receiving diapers. OCS is interested in disability status because our office includes the Social Services Block Grant (SSBG), which provides funding support for individuals with disabilities. Thus, understanding the disability status of the children served in the DDDRP will allow OCS to breakdown service silos across program offices and target additional funding support through SSBG.

In comments received during the 60-day comment period, feedback indicated that questions related to diaper-related health issues or inability may also be considered sensitive. Understanding the prevalence of diaper-related health issues among those enrolling in the program is critical to understanding the level of need for the program. OCS has retained the prefer-not-to-share option in the survey to be used by the first three cohorts, so participants understand that responses are voluntary. In the aggregate report form to be launched with cohort 4, OCS generalizes this item to reduce the sensitivity of the item.

Other comments pointed to items around language spoken and demographic items (race, ethnicity, gender) that may be used to infer whether participants are members of marginalized communities. The information about language needs has helped OCS to ensure that we provide materials in translations to reach participants in their spoken language, and the demographic information helps us to understand reach and access to our programs. OCS includes similar demographic items across our data collection efforts to ensure we standardize demographic data across all our programs. OCS retains the “prefer-not-to-share” option on the survey so that individuals understand they are not required to answer any question. Additionally, some feedback indicated that participants may be more comfortable sharing this information with their provider to aggregate into program reporting.

A12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

Instrument 1 – Beneficiary Survey

Beneficiaries enrolling in grant programs operated by grant recipients awarded in FY 2022 or 2023 will complete Instrument 1, Beneficiary Survey – Enrollment Version. There are 21 grant recipients across the three cohorts that were awarded in FY 2022 and FY 2023. Based on performance progress reports, we anticipate that grant recipients will enroll about 27,000 beneficiaries between January 2025 and April 2026 when the beneficiary survey will phase out. OCS has observed response rates near 25% for Cohort 1, 50% for Cohort 2, and 75% for Cohort 3. Based on these Cohort-level response rates, we anticipate receiving about 13,500 additional respondents between now and April 2026. OCS estimated the burden hours for instrument 1 based on average completion times recorded by the virtual survey platform during the pilot period and comments received from grant recipients during the public comment period. The average time for response is 10 minutes according to these sources.

Instrument 2 – Beneficiary Report

Instrument 2 – Beneficiary Report will be due every six months as a supplement to grant recipients' quarterly PPR. The DDDRPs are 2-year grants, so grant recipients would complete them 4 times over the course of their grant periods. All estimates were developed assuming current funding levels and similar grant structures to arrive at the number of grant recipients, partners, and respondents.

- OCS estimated 35 grant recipients will complete Instrument 2 – Beneficiary Report by considering the number of grants that may be funded if current funding levels continue for the next three years. Grant recipients will compile information provided by partner organizations that work directly with beneficiaries. We estimate an average of 3 hours of time to aggregate results across partner organizations.
- We estimated 280 partner organizations based on the current average number of partner organizations per grant recipient multiplied by the total anticipated number of grant recipients. Partner organizations will collect data from beneficiaries and summarize the findings for grant recipients. In our conversations with partner organizations, we learned that they have existing systems and processes for collecting information on participant characteristics and outcomes. This reporting effort requires that they leverage these existing processes to develop and report summary analyses for this grant. We estimate this time at 10 hours per response.
- We estimated the total number of beneficiaries 64,000 over the three-year period. Beneficiaries will need to provide enrollment and follow-up information in order for grant recipients to complete reporting. Based on conversations with grant recipients, beneficiaries already provide information to service providers upon enrollment. Therefore, we estimate a burden of 5 minutes per response to account for the additional information collected for this reporting.

Estimated Cost to Respondents

The beneficiaries will be individuals and families with low incomes living in seven different states across the country. OCS used the unweighted average state minimum wage across the country as the wage rate, which is \$10.86 per hour. Source: [U.S. DOL Consolidated Minimum Wage Table \(Effective 07/01/24\)](#).

The cost to grant recipients and partners was calculated using the Bureau of Labor Statistics (BLS) wage data from May 2023. To account for fringe benefits and overhead the rate was multiplied by two. <https://www.bls.gov/oes/current/oes210000.htm>. For grant recipient and partner efforts to report beneficiary characteristics, we use the “community and social service specialists” (21-1099) median wage rate of \$23.89. To account for fringe benefits and overhead, the rate was multiplied by two, which is \$47.78.

Information Collection Title	Total Number of Respondent	Total Number of Responses Per	Average Burden Hours Per	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
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	s	Respondent	Response				
Beneficiary Survey – Enrollment Version	13,500	1	0.167	2,250	750	\$10.86	\$8,145
Beneficiary Report – Grant Recipients	35	4	3	420	140	\$47.78	\$6,689.20
Beneficiary Report - Partners	280	4	10	11,200	3,733	\$47.78	\$178,378.67
Beneficiary Report - Beneficiaries	64,000	2	0.083	10,667	3,556	\$10.86	\$38,613.33
Estimated Annual Burden and Cost Totals:					8,179	-	\$231,826.20

A13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs to respondents and record keepers.

A14. Annualized Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$17,823.75. This sum reflects federal staff time to complete reporting for instrument 1 through April 2026, support the rollout of instrument 2 to new grant recipients annually, and validate and compile data semi-annually. The average salary of the staff working on this program is a GS12 with an average wage rate of \$99,200 annually, or \$47.53 hourly. It is anticipated that federal staff will spend about 375 hours on this project.

A15. Explanation for Program Changes or Adjustments

This is a new request. All adjustments to the instruments in comparison to the pilot versions and the versions originally drafted for comment derive from public feedback received during the 60-day comment period.

A16. Plans for Tabulation and Publication and Project Time Schedule

OCS tabulates the results of the beneficiary survey for cohorts 1 – 3 grant recipients on a bi-weekly basis. We will continue providing these regular reports to grant recipients through the close of the project period, which is scheduled to run through September 2025 for cohorts 1 and 3 and April 2026 for cohort 2. Additionally, on a quarterly basis, OCS will tabulate results alongside quarterly PPR data for review and publication at the cohort level on a public-facing dashboard. OCS has worked with ACF’s evaluation contractor Westat to develop a script that automates the tabulation and reporting of this data. OCS also shares data with the external evaluator for use in publications.

A17. Reason(s) Display of OMB Expiration Date is Inappropriate

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

Instrument 1 – Beneficiary Survey – Enrollment Version

Instrument 2 – Beneficiary Characteristics and Outcomes Semi-Annual PPR Supplement

Attachment A: Summary of Public Comments