Administration for Children and Families Generic for Engagement Efforts

OMB Information Collection Request
0970 - NEW

Supporting Statement Part A - Justification

Updated February 2025

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

Summary

This umbrella generic was established for use by the Administration for Children and Families (ACF) when efforts to engage individuals and groups who could provide valuable information to inform ACF programs and work are subject to the Paperwork Reduction Act (PRA). This includes but is not limited to those who are served, or have been served by ACF, those with expertise in ACF program areas, and individuals invested in the outcomes of ACF research and evaluation. Groups and individuals to actively engage may include but are not limited to service providers; developers of interventions, innovations, or practices; program participants; subject matter experts; federal, grant program, or other program staff; federal, state, or local leadership; groups and individuals in programs' communities; individuals with experience with or expertise in ACF services; and those in broader fields of study related to human services.

1. Circumstances Making the Collection of Information Necessary

To ensure meaningful involvement with a variety of individuals with a range of experiences and perspectives, ACF conducts engagement activities to inform various efforts, including services provided and research and evaluation.

Hearing the perspective of those affected by, experienced in, interested in, or potentially interested in ACF programs and similar programs is vital to ensure ACF is responsive to the needs of those it serves helps to ensure that resources are, and programming is appropriate, useful, and relevant for audiences. This is needed to efficiently provide services, improve services, and to reduce burden on those ACF requests information through different efforts (program reporting, research, feedback, etc.).

Efforts under this generic may inform such activities as planning for new funding and/or programming, improvements to existing programming, exploring emerging areas, development of resources, among others. For engagements related to research and evaluation plans or projects, this might include refinement of conceptual models, developing research questions, measurement choices, evaluation technical assistance, training and site support, the contextualization of findings, and external communication approaches and priorities.

These engagement activities often need to be conducted quickly, to allow for sufficient time to inform project direction and decision-making. Additionally, planning for engagement activities is most often on a quick timeline and the standard timeline to comply with a full request under the Paperwork Reduction Act (PRA) often inhibits the ability to collect information to inform these activities. Therefore, an umbrella generic is necessary to allow for quick turnaround requests for similar information collections related to these activities.

2. Purpose and Use of the Information Collection

The purpose of the information collections under this generic is to gather information from individuals with a range of experiences and perspectives to inform ACF policies and programs. The information collected will allow for ongoing, two-way collaborative and actionable communications between ACF and its state, local and/or Tribal partners, program participants, communities served or affected by ACF programs, and or others experienced with or interested in ACF programs or similar programs.

ACF envisions using information collected to improve efficiency of services and reduce burden as information collected will inform a variety of efforts and activities such as the improvement, planning, and implementation of research studies, program changes, development and dissemination of resources and products developed under ACF studies, regulatory activities, guidance, outreach and/or training activities.

The specific types of information gathering methods included under the umbrella of this clearance will vary. ACF will submit individual GenIC requests under this clearance, which will include:

- A full Supporting Statement A and, if appropriate, a Supporting Statement B[1], to include the following:
    - Intended use(s) of the information collection.
    - Demonstration of the fitness of purpose between the proposed collection and its intended use(s).
    - Specific population of focus.
    - Contextual information about the information collection, including any potential barriers or facilitators.
    - Information about proposed tokens of appreciation and/or honoraria.
    - If appropriate for the type of request, a description of the analytic method(s) used to include the strengths and limitations of the method(s) for the purpose of the study.
    - Information about how data will be communicated and shared.
    - Notification that the data collection is primarily for internal program purposes; it is not meant to be the sole information in support of policy recommendations and the findings are not meant to be generalizable. Any plans for sharing information (as described in A16) will be clearly detailed.
- Instruments, protocols, and relevant supplementary materials.

Following standard Office of Management and Budget (OMB) requirements, ACF will submit to OMB the above information about individual GenIC activities proposed under this generic clearance.

[1] If no statistical methods and analyses are planned or appropriate for the type of collection, then only a Supporting Statement A will be included with the request.

ACF will make separate submissions for clearance of full, non-developmental data collection efforts.

ACF understands that OMB will make every effort to review materials in a timely manner upon submission.

Study Design and Universe of Data Collection Efforts

Under this clearance, ACF will use a variety of approaches. Many of the data collections will solicit individuals' opinions and feedback based on personal experiences. The exact data collection and sampling methods for each GenIC will depend on the project. The particular samples will vary based on the content of the collection and the programs or policies of interest. These formative studies will collect data using well-established methodologies, including but not limited to:

- **Semi-structured discussions or conference calls**: Semi-structured discussions or conference calls with multiple participants are conversations between data collectors and one or more respondents around a series of topics, potentially including probing questions and follow-up questions. This may include listening sessions or similar semi-structured discussions during which information is requested. Unlike a structured survey, where the interview follows a prescribed set of questions or a script, semi-structured discussions are designed to be more flexible and responsive to the direction of the conversations prompted by the respondent's comments. Semi-structured discussions are useful because they allow for an interactive approach to information gathering, while maintaining some consistency across respondents. These semi-structured discussions or conference calls may be convened with an on-going group of participants over the course of a project, such as in a technical workgroup.

- **Focus groups**: This method involves group sessions guided by a moderator who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups can be more efficient than individual interviews, since multiple individuals participate at one time. In addition, the group dynamics can yield richer responses than individual interviews for some types of topics.

- **Telephone or in-person interviews**: Interviews are one of the oldest and most widely used methods of data collection. Typically structured around a prescribed set of questions, interviews can be done over the phone or face-to-face. These may be one-on-one or group interviews. With technological advances, telephone interviews have become an efficient source of systematic data collection.

- **Questionnaires/Surveys:** Questionnaires are common and popular tools to gather data from multiple people. Information from a questionnaire can inform program planning, activities, and support, as well as research and evaluation planning. Questionnaires may be used to gather information about specific programs or populations served by ACF (i.e., program processes, needs assessments, cost workbooks, etc.)

- **Roundtable and/or Breakout Sessions:** An event breakout or roundtable session is usually a workshop-style group activity often designed for problem-solving or sharing of ideas and experiences, generally related to an event theme or overarching question. ACF may use surveys, structured prompts, semi-structured protocols, or other methods to collect information during these sessions.

- **Open-ended requests:** Open-ended requests could include requests for specific information in an unspecified format. For example, a request for specific information that would include instructions and a list of specific items requested, but no specific format specified.

- **Contextualization of Existing Data:** New information collections may be designed to contextualize and enhance secondary analysis of existing quantitative or qualitative data.

Respondents could include current or prospective service providers, T/TA providers, grant recipients, contractors, current and potential participants in ACF programs or other comparable groups and others experienced with ACF or similar programs, experts in fields pertaining to ACF programs, other key groups involved in ACF projects and programs, individuals engaged in program re-design or demonstration development for evaluation, state or local government officials, or others involved in or prospectively involved in ACF programs.

ACF will submit specific GenICs as they are developed. Each submission will include a submission template (see Attachment A) and the proposed information collection, including proposed instructions, where appropriate.

3. Use of Improved Information Technology and Burden Reduction

As appropriate, programs will collect information electronically and/or use online collaboration tools to reduce burden. In some instances, information may be requested in-person, such as pre- or post-meeting feedback surveys. Information about use of technology will be included in individual GenIC requests.

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are gathered or maintained by the agency or available from other sources known to the agency. To the maximum extent possible, we will make use of existing data sources before we attempt to utilize the additional fieldwork sought under this clearance. These efforts will be described in each individual GenIC.

5. Impact on Small Businesses or Other Small Entities

Small business or other small entities may be involved in these efforts, but the agency will

minimize the burden on them, based on needs. Some examples could include asking for readily available information, and using short, easy-to-complete information collection instruments. Specific tactics for reducing burden on small businesses or entities will be included in individual GenIC requests.

6. Consequences of Collecting the Information Less Frequently

Information will be requested on an as-needed basis and only as frequently as needed to fulfill the formative needs described above. Specific information about frequency will be included in individual GenIC requests.

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

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

8. 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 December 11, 2023 (88 FR 85890) 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 (89 FR 12352), in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

9. Explanation of Any Payment or Gift to Respondents

It is extremely important to provide those served by ACF, experts, staff, and others providing their feedback for these efforts with tokens of appreciation or compensation for participation. This allows for individuals from a variety of backgrounds to participate and provide feedback to ensure the information provided can best inform efforts to improve ACF efforts. As such, we expect that the majority of the requests under this generic will include honoraria and/or tokens of appreciation. This section is specific to tokens of appreciation, **information about proposed compensation in the form of honoraria is included in section A13.**

As appropriate, tokens of appreciation may also be proposed for specific respondents. This could be to improve data quality, to account for incidental expenses (ex. transportation, cell phone data use, etc.), or address other potential anticipated issues. Tokens of appreciation may include non-monetary tokens as well as, for example: meaningful recognition, such as authorship credit or collaboration on presentations; classroom supplies; small book or toy; etc.

If a token of appreciation is proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual information collection request. Justifications will focus on data quality, burden on the respondent, past experience, improved coverage of specialized respondents, rare groups, or minority populations; reduced survey costs; and other efficiencies.

Each justification will cite the research literature that demonstrates significant improvements in response rates and non-response bias when applied to similar participants, data collection methods, and data collection contexts. Where no evidence is available, ACF may propose a field test or experiment to evaluate the effects of a token of appreciation. Additionally, proposing compensation for these types of efforts is in line with leading practices. For those served by ACF programs, this is particularly important as it recognizes the value of the time provided by participants, helps to remove barriers to participation, and affirms that the contributions from those with experience with ACF services are as valuable as those from other experts.

If tokens of appreciation are proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual GenIC request. Each justification will include any relevant ethical considerations for the populations proposed, as appropriate.

10. Assurance of Confidentiality Provided to Respondents

Personal Identifiable Information (PII) will only be collected to the extent necessary. Respondents will be assured that neither their participation nor lack of participation will have any effect on their eligibility for receipt of services. In addition, respondents will be advised of the purpose of the information collection, the use of information collection, ACF sponsorship, that their participation is voluntary, and that they may choose to discontinue or have their name and/or related information withdrawn at any time.

It may be necessary for some information collections to retain name and contact information to be used to contact potential respondents. In these instances, the rationale for retention of PII will be fully explained.

Information about any PII requested, assurances of privacy, and data security will be included in individual GenIC requests.

11. Justification for Sensitive Questions

Most questions that will be asked would not typically be considered sensitive, but it is possible some questions may be included that could potentially be seen as sensitive. For example, some ACF programs deliver services that are sensitive in nature and engaging individuals with experiences with those could potentially be sensitive. Respondents will be informed of privacy assurances and that responding to the request is voluntary. For proposed collections that include

questions of a sensitive nature, ACF will provide a full explanation when submitting an individual GenIC request.

Additionally, we may request background information such as demographics or specific experiences when looking for individuals to participate. When requesting such information, GenICs under this umbrella will prescribe to the most recent leading practices in these areas and each individual request will explain the need for the information and describe proposed uses of the data. If questions diverge from current best practices, this will be explained and justified in the individual GenIC request.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden

Respondents could include current or prospective service providers, T/TA providers, grant recipients, contractors, current and potential participants in ACF programs or other comparable groups and others experienced with ACF or similar programs, experts in fields pertaining to ACF programs, other key groups involved in ACF projects and programs, individuals engaged in program re-design or demonstration development for evaluation, state or local government officials, or others involved in or prospectively involved in ACF programs.

A variety of instruments and platforms will be used to collect information from respondents and each GenIC will vary by number of respondents and average time per response. The burden table below is illustrative. Estimates for the number of respondents and time per response have been made based on discussion with ACF program offices, but as this is a new umbrella generic, it may be possible that we will need to adjust estimates throughout the three-year approval period. If needed, ACF will submit a change request for these updates. While we will not exceed the total burden cap for this generic without requesting a change for updates, we may use more or less burden within each instrument type.

Estimated Costs

The basis for the hourly wage was determined by the average salary of individuals in locales around the country who fit into the potential respondents described above. Therefore, an estimated hourly wage of $32 per hour is used, based on May 2022 BLS data for the following occupation labor categories, but assuming participants will make up a minority of respondents: Social Science (19-0000; $40.21), Community and Social Service (21-0000; $26.81), and Education and Training (25-0000; $30.41), state government officials ($31.28), local government officials ($29.36), and program participants ($7.25). https://www.bls.gov/oes/current/oes_stru.htm. To account for fringe benefits and overhead, the wage rate is multiplied by two, which is $64.

Example Types of Information Collections	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Semi-Structured Discussions	10,000	1	2	20,000	$64	$1,280,000

and Focus Groups						
Interviews	4,500	1	1	4,500	$64	$288,000
Questionnaires/Surveys	8,000	1.5	.5	6,000	$64	$384,000
Templates and Open-ended requests	1,000	1	10	10,000	$64	$640,000
Estimated Totals:	**23,500**			**40,500**		**$2,592,000**

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

A main benefit of this generic mechanism is for ACF to actively engage those with expertise and knowledge about and/or experience with ACF-funded or similar programs to meet the purposes and uses described throughout this document.

To ensure involvement with a variety of people with diverse experiences and perspectives that would be relevant to efforts to improve ACF efficiencies, including improved services and reductions in burden, we are likely to propose to offer participants in specific information collections an honorarium for their time spent providing their expertise and experience. If honoraria are proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual GenIC request. The range for amounts offered will likely be based on commercial market rates and details will be included in each GenIC.

14. Annualized Cost to the Federal Government

We estimate the annual costs to the federal government to average around $175,000 per GenIC. Costs will be covered by the individual research and evaluation projects, from their data collection budgets. These costs will be described in individual GenIC requests.

15. Explanation for Program Changes or Adjustments

This is a request for a new overarching generic clearance.

16. Plans for Tabulation and Publication and Project Time Schedule

Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to continue more or less continuously throughout the duration of the clearance. For each individual GenIC request, we will provide OMB with an overall project schedule. ACF will develop individual timelines for projects involving generic clearances based on an understanding that submissions will be submitted directly to OMB/OIRA for timely review.

Under this umbrella generic IC, information is meant to inform ACF activities and may be incorporated into documents or presentations that are made public such as through conference

presentations, websites, or social media.

The following are some examples of ways in which we may share information resulting from these data collections: training and technical assistance (T/TA) plans, presentations, infographics, project specific reports, or other documents relevant to the field, for audiences such as federal leadership and staff, grant recipients, program participants, local implementing agencies, and/or T/TA providers. We may also request information for the sole purpose of publication in cases where we are working on outreach and awareness campaigns or to create a single source for consumers (clients, programs, researchers) to find information about resources such as services in their area, TA materials, different types of programs or systems available, or research using ACF data.

In sharing findings, we will describe the study methods and limitations regarding generalizability and as a basis for policy. Any planned uses, including for publication or sharing of information from this IC will be described and submitted for approval in each individual GenIC.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.