Constituent Engagement with Administration for Native Americans Grantees Related to Use of Artificial Intelligence

Administration for Children and Families Generic for Engagement Efforts

0970 – 0630

Supporting Statement Part A

Justification

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A1. Necessity for the Data Collection

The Department of Health and Human Services (HHS) Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (OPRE) proposes to collect information to better understand wants and needs of grantees of the Administration for Native Americans (ANA) related to use of artificial intelligence (AI), particularly relating to the administration of public benefits and services in the Tribal context.

Background

The *Executive Order (EO) on the Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence (EO 14110)* requires ACF to (1) identify and prioritize what guidance the human services field seeks on the use of AI when administering public benefits and services, and (2) provide the human service perspective to a strategic plan for AI use in HHS. In addition, more broadly, ACF has been thinking about using AI internally as well as how ACF grantees might use AI in their operations. Some grantee advocacy groups have reached out to ACF for guidance about using AI, and early interaction with the ACF Tribal Advisory Committee suggests that more engagement tribal grantees is necessary.

Hearing the perspective of those affected by, experienced in, interested in, or potentially interested in using AI in ACF programs and similar programs is vital to ensure ACF is responsive to the needs of those it serves and that resources are, and programming is appropriate, useful, and relevant for audiences.

ACF understands that Tribal communities have particularly unique aspirations, concerns, and needs. The long, contentious relationship between the Federal government and these community, combined with their sovereign authorities, creates a void in understand that cannot be properly understood though other similar, non-tribal engagement efforts around AI in the human services.

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

The primary purpose of this information collection is to obtain rapid ACF constituent input and feedback on prioritization efforts related to:

- ACF's position and response to HHS-level mandates on AI, including the following requirements from EO 14110:
    - Identifying and prioritizing what guidance and support the human services field wants and needs related to use of AI, particularly relating to administration of public benefits and services per E.O 14110 Section 7.2(b)(i);
    - Providing human service perspectives to an HHS strategic plan on AI, per E.O 14110 Section 8 (b)(i);

- Informing ACF's AI strategy and ongoing constituent engagement channels.
- Provide ANA with specific insights around the use of AI in relation to its Tribal grantees.

The gathered information will be used to help develop an internal memo synthesizing findings from constituent engagement. This memo will be used to inform ACF's AI strategy and help determine which topics to issue guidance on the use of AI to ACF grantees. It will also be used to provide ANA with specific insights around the use of AI in relation to its Tribal grantees.

This proposed information collection meets the goals and uses of the ACF generic clearance for engagement efforts (0970-0630):

- Gathering information from individuals with diverse experiences and perspectives to inform ACF policies and programs.
- Making opportunities 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.
- Exploring emerging areas
- Informing program implementation
- Informing the development and dissemination of resources and products developed under ACF studies, regulatory activities, guidance, outreach and/or training activities.

Overview of Information Collections

Information Collection Title	*Respondent, Content, Purpose of Collection*	*Mode and Duration*
Instrument 1: ANA Grantee Opinion Survey on AI	**Respondents: ANA Grantees** **Content:** Several multiple-choice questions and several short open-ended response questions that ask responds about their opinions on AI, particularly from the Tribal perspective. **Purpose:** To gather constituent input and feedback on potential benefits and challenges associated with use of AI in human services programs in the Tribal context.	**Mode:** Online Survey **Duration:** 5 minutes

Processes for Information Collection

Instrument 1: ANA Grantee Opinion Survey on AI
ANA is convening representatives from its grantee from August 27 to August 29, 2024, in Washington D.C. as part of its 50th organizational anniversary. OPRE is collaborating with ANA to deliver a plenary session on AI. This collection will be provided during the session to attendees to optionally participate in and will be available for a few weeks after the session to allow for additional responses.

A3. Improved Information Technology to Reduce Burden

The collection will be online and accessible by computer, smartphone, or tablet.

A4. Efforts to Identify Duplication

The proposed survey does not duplicate other data collection efforts, but rather complement other related efforts that do not have a specific tribal focus. The information collected is not available through other existing data sources.

A5. Involvement of Small Organizations

Small business or other small entities may be involved in these efforts, but ACF will minimize the burden on them based on coordinating the optional collection with an existing convening of grantees that is already being funded by ACF.

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 for a new umbrella generic clearance. The 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.

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 will be provided.

A10. Privacy of Respondents

Personally Identifiable Information (PII)
Information collected will not include the PII.

Assurances of Privacy

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data and that their participation is voluntary.

Data Security and Monitoring
ACF follows all appliable Federal and HHS cybersecurity rules.

A11. Sensitive Questions

The proposed information collection does not request any sensitive information.

A12. Estimation of Information Collection Burden

Burden Estimates
Respondents will participate in data collection only once. Our burden estimates were derived based on the following.

- ANA Grantee Opinion Survey on AI (Instrument 1): We expect to survey up to 300 grantee participants. Each survey is expected to take up to 5 minutes, for a total of 25 burden hours. This estimate is based on internal pretesting by ACF staff.

Cost Estimates
The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Community and Social Service Specialists [21-1099] and wage data from May 2023, which is $25.97 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $51.94. https://www.bls.gov/oes/current/oes_stru.htm

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
Instrument 1: ANA Grantee Opinion Survey on AI	300	1	.083 (5 minutes)	25	$51.94	$1,298.50

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The survey will be housed on technology infrastructure already accessible to ACF. OPRE estimates there will be no meaningful costs to the Federal Government beyond the normal labor costs for administering survey, analyzing responses, and developing an internal memo.

OPRE estimates it will take an analyst around 20 hours to administer survey, analyze responses, and develop an internal memo. The simple cost to Federal government noted below was calculated using the BLS federal executive branch mean wage data for job code for Management Analysts [13-1111] from May 2023, which is $ 55.54 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $111.08.

Instrument	Total Number of Gov't Analysts	Average Burden Hours per Analyst	Total/ Annual Burden Hours	Average Hourly Wage	Total Cost
Instrument 1: ANA Grantee Opinion Survey on AI	1	20	20	$111.08	$2,221.60

A15. Change in Burden

This is for an individual information collection under the umbrella generic clearance for ACF engagement activities (0970-0630).

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Pending OMB approval, all data collections will take place starting August 27 and ending no later than September 30. The information collected under this request is meant to inform ACF through an internal memo. The primary purpose of the internal memo is to inform ACF planning and future guidance to ACF grant recipients. In addition, this information may be incorporated into documents or presentations that are made public such as through conference presentations, websites, or social media. Audiences for such products would include federal leadership and staff, grant recipients, program participants, local implementing agencies, and training and technical assistance providers.

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

- Instrument 1: ANA Grantee Opinion Survey on AI