# Administration for Children and Families Generic for Information Collections related to Gatherings

OMB Information Collection Request 0970 - NEW

# **Supporting Statement Part A - Justification**

August 2023

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

### 1. Circumstances Making the Collection of Information Necessary

This request is to establish a new umbrella generic clearance for the Administration for Children and Families (ACF) to request information from potential participants at ACF gatherings, such as meetings or conferences. This may include large scale conferences, meetings for grantees or contractors, workshops, trainings, poster sessions, and other inperson and virtual gatherings for individuals with interest in ACF programs (clients, researchers, policymakers, etc.), among others. To ensure ACF has adequate information to plan these activities, the Agency must often collect information from potential participants such as basic contact information, preferences for attendance (mode, special requests, etc.), organizational affiliation, feedback about meeting content, etc. Additionally, some activities require ACF to have additional information to have the means to select the most appropriate participants for attendance according to the type or purpose of a given activity, or to group participants into the most appropriate category or activity during an event. This may include information about poster presentations, speaking panels, training courses, professional perspectives or experiences, etc. In addition, attendees may be asked to submit an application or abstract for prescreening to be selected for attendance.

The planning for meetings is most often on a quick timeline and the standard timeline to comply with a full request under the Paperwork Reduction Act (PRA) would inhibit 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. As part of this generic, ACF requests OMB provide a response on individual generic information collections (GenICs) within 5 business days. If no response is received and the request meets the purposes, uses and scope outlined in this document, ACF may move forward with the proposed information collection.

Note that this generic is for information collected in connection with closed ACF meetings, as information collected in connection with **public** ACF meetings are not considered "information" under PRA per 44 USC, 5 CFR Ch. 11 (1-1-99 Edition), 1320.3: Definitions<sup>1</sup>.

# 2. Purpose and Use of the Information Collection

The purpose of the collections under this umbrella generic information collection is to gather appropriate information to plan ACF gatherings. For example, registration information allows the programs to plan for meetings, workshops etc. to allow organizers to target advertising and compile proper resources and tools for participants. Additionally, collecting information to select participants for activities such as poster sessions will allow ACF to select participants who will meet the needs of the specific activity and efficiently communicate concepts and data to an audience using a combination of visuals and text. Example information collection activities could include:

<sup>&</sup>lt;sup>1</sup> https://www.whitehouse.gov/wp-content/uploads/legacy\_drupal\_files/omb/inforeg/inforeg/memos/2014/appendix-data-search-tools-calculators.pdf\_

### Registration forms

- O Information collected on these types of forms could include name, contact information, organization/affiliation, basic demographics, attendance needs, etc.
- Applications for panels, posters, or other presentation formats
  - O Information collected on these types of applications could include title, author(s), institution/organization, abstract describing presentation or poster, instructions, etc.
- Pre-meeting surveys
  - O Information collected on these types of surveys could include content preferences, scheduling needs and preferences, pre-meeting knowledge, etc.
- Post-Meeting/-Workshop/-Training Evaluation Surveys
  - O Information collected on these types of surveys could include requests for feedback on the overall activity, feedback on content, post-meeting knowledge, post-meeting uses of content, preferences for future activities, etc.

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.

At this time, ACF is submitting one GenIC that was previously approved under OMB #0970-0401² but fits more clearly under this new umbrella generic. This request is for the *Immigration Legal Services for Afghan Arrivals Event Registration Form*. Information about this request is included in Attachment B – Meeting Registration GenIC Submission Form ILSAA Event Registration.

#### 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 inperson, 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.

# 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

<sup>&</sup>lt;sup>2</sup> Approval under OMB #0970-0401 was most recently provided on May 25, 2023, title: *Immigration Legal Services* for Afghan Arrivals Event Registration and Event Feedback Forms

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.

# 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 June 1, 2023 (88 FR 35882) and provided a sixty-day period for public comment. During the notice and comment period, we did not receive comments.

#### 9. Explanation of Any Payment or Gift to Respondents

Monetary gifts or payments will not be made to attendees for completing any of the data collection instruments. On occasions, attendees may receive informational materials, tokens or souvenir. In these cases, information and justification will be included in individual GenIC requests.

# 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.

PII will be collected for some requests, primarily for following, scheduling, etc. as described above. Additionally, we may request background information such as demographics or specific experiences when looking to include individuals with lived experiences. Demographics may include items such as sexual orientation, gender identity, race, or ethnicity. When requesting such information, GenICs under this umbrella will prescribe to the most recent best 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.

In general, individual GenICs will provide information about sensitive questions and respondents will be informed of privacy assurances and that responding to the request is voluntary.

#### 12. Estimates of Annualized Burden Hours and Costs

## **Estimated Burden**

Potential respondents may include researchers, individuals with expertise in ACF program areas, individuals with interest in ACF program areas, those receiving ACF services, ACF grantees or contractors, among others with involvement or interest in ACF activities.

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). <a href="https://www.bls.gov/oes/current/oes\_stru.htm">https://www.bls.gov/oes/current/oes\_stru.htm</a>. 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
Registration Forms	30,000	1	.167	5010	\$64	\$320,640
Activity Applications	5000	1	1.5	7500	\$64	\$480,000
Pre-and Post- activity Surveys	20,000	1	.5	10000	\$64	\$640,000
Other Activities	14,000	1	.5	7000	\$64	\$448,000
Estimated Totals:	69,000		.428 (average)	29,510		\$1,888,640

This request also includes burden for the *Immigration Legal Services for Afghan Arrivals Event Registration Form* (See Attachment B and associated GenIC submission).

Information Collection	Category of Respondent	No. of Annual Respondents	No. of Responses per Respondent	Estimated Time per Response	Annual Burden Hours
ILSAA Event Registration Form	Individuals	95	4	0.017	7

The **total burden request**, including estimated burden for new collections and the burden associated with the one GenIC is **29,517 hours**.

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

There are no other costs to respondents.

#### 14. Annualized Cost to the Federal Government

The estimated hourly cost to the government for staff to review and analyze these

information collections is approximately \$50.00. The estimated time to review collections will vary, but we estimate an average time of about 30 minutes. As such, we estimate the total cost to the government will be approximately \$1,725,000 and annual amount to be \$575,000.

# 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

The information collected through this request is primarily for internal review and will not be published. However, for certain activities information submitted by accepted participants, such as research abstracts to be presented in a poster session, may be published on an ACF website or included in a printed or online program for the activity or subsequent publication describing the activity. Any plans to publish results will be described in individual ICs under this generic clearance.

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

Not applicable.

# 18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions.