

Diaper Distribution Demonstration and Research Pilot Baseline Data Collection

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

September 2024

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

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) Office of Community Services (OCS) awarded grants for the new Diaper Distribution Demonstration and Research Pilot (DDDRP) in September 2022. This change request is to reduce the number of items posed for the follow-up collection and provide instruments that show the items on each version of the survey. This change request also updates the burden estimates and planned uses of the information. The administration of the enrollment and follow-up survey will be used to inform an upcoming full information collection request for which OCS anticipates publishing a notice for the initial 60-day comment period by the end of September.

Background

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. 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 is necessary to provide us an understanding of community-level need, so that we can adequately respond.

The baseline data collected has also allowed our grant recipients to adapt their programs to community needs. OCS has regularly conveyed summary statistics about the families that the grant recipients are serving (including coping mechanisms, level of scarcity, and demographics) back to the grant recipients. Currently, Cohorts 1, 2, and 3 are using the baseline survey, with all of Cohort 3 and two grant recipients from Cohort 2 using the Unique Identifier version of the baseline. By incorporating the Unique Identifier in a previous change request, OCS is able to provide site-level data to grant recipients about the needs of their participants. Grant recipients have noted that this information is valuable for helping them to better support the many sites operating diaper distribution programs. Sites also report that high quality information on the needs of participants can help to better target services and leverage other resources for the communities served.

The follow-up collection was approved in a previous change request and will be implemented with Cohort 3 and the grant recipients from Cohort 2 that are using the Unique Identifier. The use of this follow-up collection with grant recipients using the Unique Identifier allows ACF to have a preliminary understanding of how diaper need changes after receipt of the pilot services. OCS would like to pose a reduced set of items for the follow-up collection in order to reduce burden on participants completing the assessment. The follow up assessment will focus on change in participants’ experiences with participants’ diaper need from the baseline measurement at enrollment through the follow-up period.

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

This information collection request includes two surveys (baseline and follow-up) designed to collect information to inform OCS's internal planning around programming and supports provided to these new programs, and to inform planning for an upcoming evaluation to be conducted by the ACF Office of Planning, Research, and Evaluation (OPRE).¹

Specifically, the information collected is meant to fulfill the following purposes:

1. Collect demographic data and assess baseline, community level diaper needs from beneficiary families.
2. Standardize data collection metrics across grant recipients and partner organizations as they prepare to enroll families in their diaper programs.
3. Gather initial information about individuals enrolling in the diaper pilot to inform the development of the full federal implementation evaluation.
4. Collect information at a second time point to measure beneficiary experiences related to diaper need over time.

The intended uses of the results include the following:

- Provide program data for OCS's internal planning purposes. Ensure the research study has baseline and follow up data that are current and reflect the state of the partner organizations and the diaper need of the beneficiaries at the beginning and end of the diaper pilot.
- Inform the development of an information collection to support the operations of the Diaper Distribution Pilot in the longer term.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Obtaining input on the development of program performance measures (PM) from grantees or experts in a relevant field.
- Obtaining feedback about processes and/or practices to inform ACF program development or support.
- Development of learning agendas and research priorities.

Guiding Questions

¹ Information collection requests related to this evaluation will be submitted to OMB, as appropriate when the Paperwork Reduction Act applies.

This request includes two versions – one for baseline and one for follow-up – of a survey created by OCS to fulfill the purposes and uses described above. Table A1, below provides more detail about the instrument.

The **Beneficiary Survey** was designed to address the following questions.

- What are the demographics of the families that are participating in the diaper pilot?
- How frequently do families with low incomes experience diaper need?
- How do families with low incomes problem solve around their diaper need (i.e., do they borrow from a friend, make their supply stretch, etc.?)

Processes for Information Collection

The data will be collected by OCS in partnership with the DDDRП grant recipients. OCS staff will work with partner organizations to socialize the beneficiary survey and support partner organizations in ensuring they can collect baseline enrollment information from program participants. For grant recipients using a unique identifier, OCS staff will work with grant recipients to follow up with participants on their diaper need after receiving services. Grant recipients will administer a shortened version of the survey to participants at this time. OCS will put the beneficiary survey in an electronic collection system (i.e., Survey Monkey) and share the link with the partner organizations via email. The partner organizations will administer the survey electronically to beneficiaries. OCS will automatically have access to survey results via the electronic collection system, reducing the burden on partner organizations needing to send the information back to the federal office.

Table A1

<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Instrument 1: Beneficiary Survey	Respondents: Direct beneficiaries of diapers and diapering supplies funded by the Diaper Distribution Demonstration and Research Pilot Content: Diaper need assessment and demographic data collection Purpose: (1) Gather baseline demographic data on participating families; (2) Assess diaper need prior to being enrolled in the pilot	Mode: Survey Duration: 5 minutes
Instrument 2: Follow-Up Survey	Respondents: Direct beneficiaries of diapers and diapering supplies funded by the Diaper Distribution Demonstration and Research Pilot at sites using the unique identifier Content: Diaper need assessment and demographic data collection Purpose: Assess change in diaper need after several months of service	Mode: Survey Duration: 4 minutes

A3. Improved Information Technology to Reduce Burden

Surveys will be completed and submitted electronically to reduce collection burden. This will allow data to be sent efficiently to the federal office via a secure electronic mailing system.

A4. Efforts to Identify Duplication

There are no similar data sets or collections available as this is the first ever federally funded diaper distribution program. There are no other federal agencies that supply or coordinate the distribution of diapers to families with low incomes. OCS has consulted peer-reviewed research on the implementation and impact of other diaper distribution programs to inform this data collection. OCS and OPRE are collaborating on this work to ensure information collections related to DDDRP do not duplicate efforts, but instead increase utility and government efficiency through the related efforts.

For the follow-up survey, beneficiaries are asked to respond to a subset of the same demographic questions they answered when they completed the survey at intake. This duplication is necessary to ensure that the same adult responded to the intake and follow-up surveys.

A5. Involvement of Small Organizations

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

A6. Consequences of Less Frequent Data Collection

Respondents at a subset of grant recipient sites will be asked to complete the Beneficiary Enrollment Survey (Instrument 1) a second time. If the survey is not administered a second time, OCS will not be able to collect data on beneficiary experiences after several months of services, which will hamper OCS' ability to monitor and assess the program.

A7. Special Circumstances

This information collection was initiated prior to the publication of SPD-15, so the race and ethnicity items were not developed in alignment with the current standards. This change request maintains the original items for race and ethnicity 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. Second, OCS is conducting a follow-up administration of the survey, and the demographic items for the respondents, including the race and ethnicity items, are important for checking that the respondents at time one are the same respondents at time two. OCS will implement a race and ethnicity item that complies with the SPD-15 reporting standards in the full request that is currently under review. OCS anticipates receiving clearance for a compliant item in January of 2025.

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 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 to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), 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, 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

OCS proposes providing non-monetary tokens of appreciation such as books, baby toys, baby dental supplies or similar items to beneficiaries that participate in the survey data collection. OCS would like to provide these non-monetary tokens of appreciation to families with low incomes to thank them for taking the time to complete the beneficiary enrollment survey. Families with low incomes are often surveyed, assessed, and asked to complete forms without any acknowledgment of their time. OCS would like to ensure the participating families know that their time is appreciated. OCS will work closely with partner organizations, who have direct relationships with the beneficiaries, to determine which tokens of appreciation will be most appropriate.

A10. Privacy of 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.

To enhance the utility of Instrument 1 (Beneficiary Enrollment Survey) for grant administration and research planning, the survey includes a Unique Identifier for each adult respondent. OCS support grant recipients to generate Unique Identifiers that are new, nonsensical numbers (i.e., not reflecting any identifying information such as social security number).

OCS would not have access to the unique identifier coding system held by each grant recipient. Thus, neither ACF nor evaluators would be holding any Personally Identifiable Information.

A11. Sensitive Questions

OCS is collecting two data points that may be considered sensitive information. First, OCS is collecting gender for both caregivers and children enrolled in the DDDRP. Our office collects demographic data, including gender, in both our Low Income Home Energy Assistance Program (LIHEAP) and Low Income Household Water Assistance Program (LIHWAP) quarterly reports (OMB#: 0970-0589 and OMB #: 0970-0578, respectively). Thus, OCS intends to include gender in this data collection to ensure we standardize demographic data collection across all our programs.

Second, OCS intends to collect 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.

If a respondent does not feel comfortable answering these or any other question, all questions include the option “prefer not to share.”

A12. Estimation of Information Collection Burden

Burden Estimates

There are 21 grant recipients across 3 Cohorts. Based on performance progress reports, we anticipate that grant recipients will enroll 45,500 participants between fall 2022 and January 2025, when we anticipate receiving clearance for a standalone information collection. 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 4,000 additional respondents between now and January 2025. The project team estimates that it will take each respondent about 5 minutes to complete the survey.

Beneficiaries at a subset of grant recipients in Cohorts 2 and 3 are being asked to complete the survey at a second point in time. We estimate 9 grant recipients will participate in the follow-up data collection because they are currently using the unique ID. We estimate distributing the survey to up to 7,000 potential respondents who have already enrolled in these programs at least 3 months prior to the outcome survey. OCS anticipates a survey response rate of 75%, which is consistent with response rates observed for grant recipients using the unique ID at baseline. This means there will reasonably be about 5,250 actual respondents. The project team estimates that it will take each respondent about 4 minutes to complete the survey.

Cost Estimates

The respondents to the Beneficiary Survey 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 \(Effective 07/01/24\)](#)

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
Beneficiary Enrollment Survey - Intake	4,000	1	.083	333.33	\$10.86	\$3,620
Beneficiary Enrollment Survey – Follow-up	5,250	1	.067	350	\$10.86	\$3,801
Total Burden and Cost Estimates:				683		\$7,421

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$12,900. This sum reflects federal staff time to send out the survey instruments, complete interviews, administer data collection, and analyze data. The average salary of the staff working on this program is a GS12, which is compensated at an average wage rate of \$89,834 annually, \$43 hourly. It is anticipated that federal staff will spend about 300 hours on this project.

A15. Change in Burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531). Burden estimates have been updated to reflect response rates to date and anticipated responses for ongoing efforts.

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

Data collection will begin after OMB approval. It is anticipated that data collection will take about twelve weeks (over two waves). After data collection, data analysis will take about four to six weeks. In addition, we will share raw data with the federal evaluation contractor.

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 – Beneficiary Survey – Baseline Version

Instrument 2 – Beneficiary Survey – Follow-Up Version