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Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

**From:** Jessica Hale

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Administration for Children and Families (ACF)

**Date:** April 11, 2025

**Subject:** Summary ofupdates to New Information Collection Request Currently Under Review *Diaper Distribution Demonstration and Research Pilot Beneficiary Information*

This memo provides a brief overview of the proposed changes to the Diaper Distribution Demonstration and Research Pilot Beneficiary Information collection that is currently pending review at the Office of Management and Budget (OMB) (ICR Ref. No. 202412-0970-007).

***Background***

The Office of Community Services (OCS) developed the Diaper Distribution Demonstration and Research Pilot (DDDRP) Beneficiary Information collection based on the pilot collection, which was approved and fielded under the Formative Data Collections for ACF Program Support information collection (OMB #0970-0531). Following the pilot, as the program grew in scope, OCS worked to move the information collection to a full request, with an individual OMB number.

The initial notice was published in the *Federal Register* inviting comments on the DDDRP Beneficiary Information collection over a 60-day period of time (89 FR 79296). OCS incorporated feedback from grant recipients that had been received during the 60-day public comment period, including the development of a new aggregate report (Instrument 2: Beneficiary Report) for the cohort newly awarded in fiscal year 2025 and grant recipients receiving funding from future appropriations.

The second notice was published in the *Federal Register* to open a 30-day comment period for comments on December 20, 2024 (89 FR 104186) and final proposed materials were sent to OMB for review and approval. As promised in the supporting statement, OCS worked to collect additional feedback during the 30-day period to refine the newly developed aggregate report. At the start of the 30-day comment period, OCS emailed grant recipients with instructions to send written feedback to OMB on the instruments and inviting them to meet with OCS for any discussion about how the report might be revised to better align with their operations. During this time, OCS received questions about how grant recipients might implement the report, but we did not receive feedback regarding changes needed to the instrument. Additionally, during this period, OCS sought feedback from the independent evaluator for the DDDRP on refining the instrument. The evaluator provided feedback based on their in-depth knowledge of grant recipient reporting systems. In this change submission, OCS has made several updates to improve the quality of the data collected based on feedback from the evaluator.

***Overview of Proposed Updates***

*Overview*

OCS makes changes to improve the clarity and quality of data collected for Instrument 2: Beneficiary Report. Additionally, we make changes to Supporting Statement A to describe changes made the program office.

*Improving Clarity and Data Quality for the Beneficiary Report*

Instrument 2 has been updated to provide 1) clarify and improve cover page and characteristics items, 2) revise columns to simplify the information requested, and 3) simplify outcomes requested.

* Clarified and improved cover page and characteristics items
  + Cover page: Provides limited response options for reporting period, with the selected response populating other tabs of the workbook to draw attention to the reporting period covered by the request.
  + Child characteristics page: add an “other” category for childcare enrollment to more fully capture this nuanced construct.
  + Family characteristics page: add categories for the number of children residing in the household for more complete reporting.
* Revised columns
  + It simplifies the request by revising the response columns to only include:
    - Number of children/ caregivers/ families newly enrolled this reporting period
    - Optional notes to describe any nuance or idiosyncrasies in reporting
* Simplified outcomes reporting
  + Questions were revised or removed to reduce the reporting burden and increase clarity:
    - The item to evaluate diaper need was broadened to ask for changes in diaper need rather than the number of days without diapers; additionally, the scope of this item was narrowed to families reporting diaper need at baseline.
    - The item to evaluate changes in diaper health issues was updated to narrow the scope to families who had reported diaper related health issues at baseline.
    - The item to evaluate changes in childcare access was updated to narrow the scope to families who needed childcare at baseline.
    - Several items were removed in order to reduce burden and focus on the most proximal and reliably measured outcomes of the program:
      * Reductions in the use of mitigation strategies
      * Improvements in the family’s ability to manage expenses
      * Improvements in caregiver stress levels
      * Childcare attendance
    - Finally, we add an item about how caregivers with employment needs at baseline are addressing those needs at follow up. Conversations with our grant recipients indicate that employment and education services are a frequently offered service due to the high level of need among this population. Therefore, this indicator allows us to understand how program activities are supporting participants in addressing those needs.

*Updates to Supporting Statement A*

Item A15 on Supporting Statement A was updated to describe the edits made to clarify requested data elements and simplify the form. This section summarizes the changes described above, in addition to describing earlier updates suggested by Westat to:

* Provide more details for instructions to complete the child and caregiver characteristics tab;
* Provide guidance for collecting race and ethnicity data on the child and caregiver characteristics tab to support compliance with Statistical Policy Directive 15;
* Revise categories for reporting child age for clarity;
* Add rows to automatically sum totals; and
* Remove the item about family structure.

***Time Sensitivities***

Cohort 2 will begin enrolling participants imminently. As such, we would like to share the final version of the Beneficiary Report with them to support their enrollment data collection.