

To: Kelsi Feltz
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Jessica Hale
Office of Community Services
Administration for Children and Families (ACF)

Date: February 9, 2025

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

This memo requests approval of changes to the following information collection that is currently under review by OMB, Diaper Distribution Demonstration and Research Pilot Beneficiary Information (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 housed under the Formative Data Collections for ACF Program Support information collection (OMB #0970-0531). A notice was published in the Federal Register to open a 30-day comment period for the DDDRDP Beneficiary Information collection on December 20, 2024.¹ The instruments included in the submission to OMB had 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.

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 DDDRDP 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.

Additionally, after the submission to OMB, the Executive Order on Defending Women made it clear that items related to gender should be removed from the instruments.

¹ Submission for Office of Management and Budget Review; Diaper Distribution Demonstration and Research Pilot Beneficiary Information, *Federal Register*, 2024-30407 (89 FR 104186), December 24, 2024: <https://www.federalregister.gov/documents/2024/12/20/2024-30407/submission-for-office-of-management-and-budget-review-diaper-distribution-demonstration-and-research>

Overview of Requested Changes

Overview

OCS makes changes to improve the clarity and quality of data collected for Instrument 2: Beneficiary Report. Additionally, we make changes to comply with the Executive Order on Defending Women to both Instrument 1: Beneficiary Survey and Instrument 2: Beneficiary Report.

Improving Clarity and Data Quality for the Beneficiary Report

Instrument 2 has been updated to provide 1) more detailed instructions for the child characteristic and caregiver characteristic tabs, 2) new columns to clarify the counts being requested, and 3) simplified reporting.

- Instructions
 - Clarifies that the child characteristics tab should only include children who are receiving diapers
 - Provides guidance for collecting race and ethnicity data on the child and caregiver characteristics tab to support compliance with Statistical Policy Directive 15.
- New columns
 - It includes new columns to clarify the counts of information being requested:
 - Number of children/ caregivers/ families from the prior period's beneficiary report
 - Number of children/ caregivers/ families newly enrolled this reporting period
 - The total number of children/ caregivers/ families
- Simplified reporting
 - Questions were revised or removed to reduce the reporting burden and increase clarity:
 - Family structure was removed
 - Children age categories were revised for clarity
 - Clarifies that childcare enrollment at baseline and at follow up is only for children under-age for kindergarten

Removing References to Gender

In compliance with the Executive Order on Protecting Women, OCS has removed items from both the Instrument 1: Beneficiary Survey and Instrument 2: Beneficiary Report that request information about gender. These items have been replaced with requests for information on sex, with only two categories—male and female.

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.