

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: April 30, 2026

Subject: NonSubstantive Change Request – Diaper Distribution Demonstration and Research Pilot Beneficiary Information (OMB #0970-0642)

This memo requests approval of nonsubstantive changes to the approved information collection, Diaper Distribution Demonstration and Research Pilot (DDDRP) Beneficiary Information (OMB #0970-0642).

Background

In April 2025, Office of Community Services (OCS) received approval to use the new Beneficiary Report to collect information about the characteristics and outcomes of beneficiaries of the DDDR. This approval included:

- Continued administration of the Beneficiary Enrollment Survey (BES) with grant recipients that had already been administering the survey through April 2026, when those projects were scheduled to end.
- Administration of the new Beneficiary Report for new awardees.

Currently, only seven grant recipients continue to use the BES, and their project period end date is April 30, 2026. Given the potential for a short extension of the project timeline (e.g., through a no-cost extension), these projects may remain operational beyond April 2026.

The current OMB expiration date is April 30, 2028, but materials submitted and approved describe data collection ending in April 2026. Currently approved burden estimates include enough estimated burden hours to allow data collection for at least one more year.

Additionally, as we have developed resources to support grant recipients in completing the outcomes tab, we have identified areas where the instructions and data elements could be clarified to improve data quality. These improvements will help ensure consistent reporting across all grantees and enable more reliable cross-checking of data totals.

Overview of Requested Changes

To collect complete information about beneficiaries in these seven projects, OCS requests permission to continue using the BES until these projects actually close—even if that extends past April 2026. Specifically, OCS proposes **reporting clarifications to the Supporting Statements** to make it clear that reporting requirements will continue until the end of the grant and program administration. Previous versions reference April 2026 as the end, however due to

potential extensions to project periods for cohort 2 grant recipients, it is necessary to extend reporting requirements beyond the original date provided. However, no changes to overall burden are needed because grant recipients have enrolled fewer participants in the BES than anticipated when the last package was cleared.

OCS proposes the following changes to the Outcomes tab of the Beneficiary Report for clarification and to improve data quality.:

1. **Clarification of Total Enrollment Indicators (OT# items):** Revise the description of items OT1, OT2, OT3, and OT4 to explicitly state that these totals should only include participants who provided data for the outcomes report during the reporting period. The updated language will read: "Total [Population] [with Specific Need] at Baseline Reaching 6-Month Enrollment Milestone This Reporting Period **Contributing Data to This Report.**" This clarification will help grantees understand that the OT# totals should reflect only those participants for whom outcome data was actually collected and reported, not all participants who reached the milestone.
2. **Addition of "Unknown" Response Category:** Add an "Unknown" row (with corresponding item codes ONU, OEU, OHU, and OCU) to each outcome measure section to capture instances where outcome data could not be determined. This addition will:
 - Allow grantees to account for all participants who reached the 6-month milestone
 - Facilitate easier cross-checking between the OT# total enrollment indicators and the sum of outcome responses
 - Improve data completeness and transparency in reporting
3. **Clarifying Composite Employment Outcome Measure (Item OE5):** To clarify the number of individuals who engaged in any activities measured under the Caregiver Education, Training and Employment Activities section, we have supplied a form item requesting: "Number of caregivers with employment needs at baseline who report having: 1) prepared for employment or training, 2) enrolled in education or training, OR 3) obtained employment this reporting period." This new item (OE5) will capture caregivers who achieved at least one positive employment-related outcome, providing a complementary measure to item OE4 (which captures caregivers who did not achieve any of these outcomes).

These changes are designed to improve data quality and reporting accuracy. The "Unknown" category and the composite employment measure (OE5) do not alter the substantive content of the data collection but rather provide grantees with clearer reporting options that better capture the full range of participant outcomes. The clarifications to the OT# items are instructional in nature and do not change what data is being collected.

These modifications do not impact the estimated burden currently described in the approved supporting statements, as the information being reported was already being collected; these changes simply provide clearer categories for reporting that information.

Time Sensitivities

OCS respectfully requests a response to this non-substantive change request as soon as possible,

to clarify reporting timelines immediately. Additionally, this will allow OCS to finalize updated reporting resources in partnership with a contractor and ensure that the materials can be completed during the contract term. Finally, timely approval will allow grantees to have adequate time to familiarize themselves with the revised Outcomes tab.