ACF Data Request

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

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A1. Necessity for the Data Collection

The Foundations for Evidence-Based Policymaking Act of 2018[1], the Federal Data Strategy[2], and the Administration for Children and Families (ACF) Interoperability Action Plan[3] all promote sharing of Federal data. In 2023, the ACF Office of Planning, Research, and Evaluation (OPRE) developed and submitted for approval the form included in this request to support these calls for action by improving ACF's data sharing efforts. The original request, titled ACF Optional-Use Data Sharing Request Form, was approved May 17, 2023. The current change request includes an update to the title of the collection and updates to the form to improve overall usability and better align with ACF internal guidance on data sharing.

Background

Until the creation and approval of the first version of this form, ACF had no standardized methods or tools to receive and respond to requests for data for research or statistical purposes. Each ACF program office chooses its own procedures and makes determinations about whether to share data based on applicable laws and regulations for their programs and data.

The OPRE Division of Data and Improvement is working to improve program office data sharing efforts. As part of these efforts, OPRE created the ACF Data Request form. This request under the *Formative Data Collections for Program Support* generic information collection is specific to this form, which provides program offices with a standardized data collection tool that can improve the efficiency and equity of responsibly determining when and what to share data with outside entities.

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

The purpose of the ACF Data Request form is to facilitate processing of requests for access to ACF program office data for research and statistical purposes from outside entities—generally anticipated to be university-affiliated researchers (e.g. professors and graduate students) and individuals from research-oriented organizations interested in studying the outcomes of ACF human services grants and programs. The form provides a standardized list of questions relevant to such types of data requests.

OPRE intends for the ACF Data Request form to be a tool for program offices to aid in decision-making on how to respond to data requestors. OPRE built the form to be broad enough to meet the needs of any ACF program office, while also basing it on best practices from the U.S.

[1] https://www.congress.gov/bill/115th-congress/house-bill/4174
[2] https://strategy.data.gov/
[3] https://www.acf.hhs.gov/sites/default/files/documents/iap_executive_summary_final_083118_508_0.pdf

Department of Health and Human Services (HHS) and other government agencies for such data sharing.[4] This helps ensure that regardless of the amount of data shared, that it will be done while maintaining or improving the appropriateness of such sharing—that is to say that any data sharing conducted will be still be done within the bounds of what is approved for the relevant data, whether based on legal requirements, uses approved by OMB during their application for collection, or otherwise. OPRE has and will continue to provide resources and supports to assist program office staff in understanding how to assess data sharing requests for research and statistical purposes that complements this data request form. Under current ACF policy, this form is not required for use by ACF program offices.

This collection is intended to improve ACF decision-making, program support, and support for relationships with those with interest in ACF programs. By using this standardized form for intake of data sharing requests, it is intended that ACF program offices can (among other possibilities):

- Improve efficiency and accuracy of responses to requests.
- Ensure better equity of responses to requests.
- Maintain or improve the appropriateness of sharing data.
- Promote the use of ACF data for research purposes in a manner which may lead to findings that can improve overall program value and effectiveness.
- Enhance internal efforts related to data use and data sharing through knowledge built by aggregations of the collected requests.
- Provide more efficient and effective aggregated data sharing-related statistics for reporting purposes to leadership and other relevant stakeholders.

All the collections approved under this clearance will be used for the purposes of informing ACF's decision-making around data sharing requests.

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

- Delivery of workflows related to program implementation or the development or refinement of program processes. This could include the development and refinement of recordkeeping or communication systems.
- Requesting information about resources, programs, or other ACF services or related activities to provide consolidated public sources of information for those using or interested in ACF-funded services, or those interested in systems, programs, or research related to ACF.

Processes for Information Collection

[4] For example, OPRE did a crosswalk of the draft data request form with the Department of Housing and Urban Development (HUD) Office of Research, Evaluation, and Monitoring's similar *Application for Data License* (https://www.huduser.gov/portal/publications/pdf/data_license.pdf) to help ensure overall quality.

OPRE intends for the data request form to be an electronic tool for ACF program offices to aid in responsible decision-making on how to respond to data requestors. The form is provided to program offices by OPRE electronically, and in turn the program offices are able to provide the form to data requestors in the manner determined by that office (whether via email, hosted on the respective program office website, or other means).

The requestors are able to complete the form at their convenience and submit it back to the respective ACF program office based upon that office's preferred method (e.g. via email) for approval review.

A3. Improved Information Technology to Reduce Burden

The data request form is housed on existing government technology infrastructure and accessible to ACF program office staff to provide to outside entities in a manner determined by that office. It is a fillable digital form that data requestors will be able to complete and submit electronically at their convenience.

A4. Efforts to Identify Duplication

While ACF program offices may be collecting portions of the data requested in the form in an ad hoc manner as part of their existing processes for processing data sharing requests, this information does not exist elsewhere in a standardized and consolidated format. OPRE is presently working to help ACF standardize its data sharing request processes in part to further efforts to improve efficiencies and avoid such duplication.

A5. Involvement of Small Organizations

To reduce potential burden on all data requestors, which may include small organizations or businesses, the ACF Data Request form is available electronically and can be completed at the requestor's convenience.

A6. Consequences of Less Frequent Data Collection

There are no known consequences of less frequent data collection. Because use of the tool is presently optional, if the ACF program offices do not use the tool, the anticipated consequence is that data sharing requests will be conducted using existing business practices.

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

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 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 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 60-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 ACF.

A9. Tokens of Appreciation for Respondents

No tokens of appreciation for respondents are proposed for this information collection.

A10. Privacy of Respondents

This request includes the collection of basic personally identifiable information (name, relevant contact information, and relevant work information) for the purpose of 1) having the appropriate contact information to reply to the request, 2) understanding the requestor's work affiliations as it relates to the request, and 3) assessing and ensuring the appropriate privacy and security of the data that is being requested.

The request also includes the collections of "names, project roles, organizational/institutional affiliations, and contact information of all individuals that will have access to the data" for the purpose of assessing and ensuring the appropriate privacy and security of the data that is being requested.

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. ACF 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.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Burden Estimates

OPRE has based burden estimates on feedback from ACF program office staff and estimates done by OPRE subject matter experts. OPRE estimates the burden for an outside requestor using the data sharing request form to be approximately three hours. OPRE also estimates that 100

individual data requestors will use this form to request data annually from ACF program offices. Our total burden estimate is based on a request for approval for use for three years.

Cost Estimates

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) the national mean wage data for the job code for Social Scientists and Related Workers, All Other [19-3099] from May 2023, which is $49.14per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $98.28.

https://www.bls.gov/oes/current/oes_stru.htm

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Cost
ACF Optional-Use Data Sharing Request Form	300	1	3	900	300	$98.28	$88,452

A13. Cost Burden to Respondents or Record Keepers

There are no additional anticipated costs to respondents.

A14. Estimate of Cost to the Federal Government

As the form will be housed on existing government technology infrastructure for accessibility, OPRE estimates there will be no meaningful costs to the Federal Government beyond the normal labor costs for staff who already process such data sharing request. OPRE estimates costs to the government will mostly be incurred around standard labor costs for staff for the review/analysis of responses to the form.

OPRE estimates it will take a program office analyst one hour per form to review and make a corresponding determination regarding the data sharing request. The simple cost to Federal government noted below was calculated using the BLS federal executive branch mean wage data for job code for Management Analysts [13-1111] from May 2023, which is $ 55.54 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $111.08.

Instrument	Total Number of Gov't Analysts	Total Number of Reviews Per Analyst	Average Burden Hours Per Review	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Cost
ACF Optional-Use Data Sharing Request Form	10	30	1	300	100	$111.08	$33,324

At the same time, this data request form is intended to help streamline part of the existing data request processes used by program offices. Since there is not currently a streamlined process for data requests, OPRE anticipates a potential average cost savings to the government when used relative to use of present methods. Given the ad hoc nature of current practices, the average time currently spent on responses by program office analysts to data requests is not presently known. Therefore, no relative cost savings estimates can be provided.

A15. Change in Burden

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

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

Use of the form will begin after OMB approval. Information submitted on the forms will be used for internal purposes to respond to requests and improve related internal processes through potential aggregated statistics; information submitted will not be made public to the extent permitted by law (e.g. if subject to a FOIA request).

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

ACF Data Request