Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

SAVES Center Data Collection for Program Improvement

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A

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Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a generic information collection under the umbrella generic, Formative Data Collections for Program Support (0970-0531).

- **Description of Request:** The Safe Access for Victims' Economic Security (SAVES) Center is a five-year project funded by the Office of Child Support Services (OCSS) in the Administration for Children and Families to increase safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence. The requested data collection will involve extraction of administrative data from SAVES demonstration sites' automated systems and administration of surveys with program staff to better understand efforts to increase safe access for survivors in local child support programs in the 13 SAVES demonstration sites. Information will help OCSS to identify opportunities for program improvement and change and will inform the development of a qualitative study. We do not intend for this information to be used as the principal basis for public policy decisions; rather it is for program improvement.

- **Time Sensitivity:** The SAVES Center is a five-year project that is currently in the second year. Approval of this request in year two will allow for the SAVES Center to complete the data collection and reporting within the project timeline.

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A1. Necessity for Collection

The Safe Access for Victims' Economic Security (SAVES) Center is a five-year project funded by the Office of Child Support Services (OCSS) in the Administration for Children and Families (ACF). One of the main purposes of the SAVES Center is to build the evidence and knowledge base needed to better serve survivors of domestic violence in the child support system. This data collection is a necessary step to reaching that goal. Specifically, these data collection activities will help ACF better understand the child support systems at the SAVES demonstration sites and identify opportunities for program improvement and change. The information will also inform the development of a qualitative study which will be submitted for review and approval in the future.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose

Purpose and Use

The purpose of this data collection is for ACF to better understand efforts to increase safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence in local child support programs in the 13 SAVES demonstration sites. ACF intends for this information to be used for program improvement for the 13 SAVES demonstration sites' child support programs and for the SAVES Center in terms of informing resource and support development as well as training and technical assistance (T/TA). Additionally, this data collection will inform development of a qualitative study, focused on better understanding domestic violence survivors' experiences with the child support system, that ACF plans to submit a full request for Office of Management and Budget (OMB) review once the study is designed.

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

- Inform the development of ACF research priorities on improving safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence by illustrating the sociodemographic and child support case characteristics of domestic violence survivors in the child support programs and the current policies and practices regarding domestic violence and safety in child support programs at the 12 state and one Tribal child support programs that have been selected to be SAVES demonstration sties
- Inform the planning for, and delivery of, both programmatic and evaluation-related T/TA to child support staff at the 12 state and one Tribal child support program that have been selected to be SAVES demonstration sites

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information.

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Guiding Questions

- What are the sociodemographic and child support case characteristics of custodial parents (CPs) and non-custodial parents (NCPs) in child support cases where a family violence flag is applied versus CPs and NCPs in child support cases where a family violence flag is not applied at SAVES demonstration sites?
- What are the current policies and practices regarding domestic violence and safety in child support programs at the 12 state and one Tribal child support programs that have been selected to be SAVES demonstration sites?
- Do the SAVES demonstration sites' teams view the SAVES Center as providing support for their efforts to increase safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence?
- What T/TA needs do the SAVES demonstration sites' teams have for the SAVES Center?

Information Collection Procedures and Processes

Data Collection Activity	*Instruments*	*Respondent, Content, Purpose of Collection*	*Mode and Duration*
Administrative data extract	Instrument 1: Child Support Administrative Data Extract	**Respondents**: SAVES demonstration sites **Content**: Extract of de-identified administrative data on sociodemographic and child support case characteristics of custodial and noncustodial parents from the automated child support systems maintained at SAVES demonstration sites **Purpose**: To understand the sociodemographic and child support case characteristics of custodial parents and noncustodial parents in child support cases where a family violence flag is applied versus those where a family violence flag is not applied	**Mode**: Secure electronic data transfer **Duration**: Twice (Year 3 and Year 5); 3 hours per response
Survey	Instrument 2: Child Support Policies and Practices Survey	**Respondents**: SAVES demonstration sites' child support programs **Content**: Descriptions of relevant policies, practices, and/or resources and challenges in their implementation **Purpose**: To understand the current policies and practices regarding domestic violence and safety in child support programs	**Mode**: Online (ex. Qualtrics) **Duration**: Twice (Year 3 and Year 5); 1 hour per response
Survey	Instrument 3: SAVES Center Grantee Meeting T/TA Feedback Survey	**Respondents**: SAVES demonstration sites' teams **Content**: Feedback on T/TA provided at the SAVES Center annual grantee meeting and T/TA needed both in general and at future SAVES Center annual grantee meetings	**Mode**: Online (ex. Qualtrics) **Duration**: Annually (Year 3-Year 5); 15 minutes per response

		Purpose: To understand if the SAVES Center is supporting the SAVES demonstration sites in their efforts to increase safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence and how the SAVES Center might improve the T/TA that it provides	
Survey	Instrument 4: SAVES Center Learning Community Call T/TA Feedback Survey	**Respondents**: SAVES demonstration sites' teams **Content**: Feedback on T/TA provided at the SAVES Center monthly learning community calls and T/TA needed at future SAVES Center monthly learning community calls **Purpose**: To understand if the SAVES Center is supporting the SAVES demonstration sites in their efforts to increase safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence and how the SAVES Center might improve the T/TA that it provides	**Mode**: Online (ex. Qualtrics) **Duration**: Monthly (Year 3-Year 5); 3 minutes per response

Other Data Sources and Uses of Information

The SAVES Center is also compiling publicly available information on policies and practices pertaining to domestic violence and child support and parenting time in state statutes, agency documents and other internet materials for the demonstration sites. The goal of this compilation is to help the demonstration sites better understand the range of current policies and practices that are in use in other demonstration sites, opportunities for policy/program change, and policies that might strengthen safe access to child support services for domestic violence survivors. Another goal of the compilation is to check the accuracy of publicly available information, identify key features of policy and practice that are not available in public sources and obtain updated and/or accurate information on relevant practices and policies pertaining to domestic violence safety and child support, parenting time, and establishment of parentage services at the demonstration sites. The SAVES Center plans to summarize this information into 2-3 short briefs to share with the demonstration sites and more broadly.

A3. Use of Information Technology to Reduce Burden

The data collection will all be done electronically via secure data transfer (Instrument 1) and online surveys (such as Qualtrics; Instruments 2-4) to reduce the burden.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

As mentioned in the *Other Data Sources and Uses of Information* section, the SAVES Center is also compiling publicly available information which may overlap and/or differ from the data collected from the staff at the demonstration sites themselves. The SAVES Center will synthesize and share the publicly available information to also facilitate and contribute to program improvement by helping the demonstration sites better understand their current policies and practices, opportunities for

policy/program change, and what information is not accessible online and/or presented in an inaccurate or incomplete manner.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

Data must be collected twice for the administrative data extract and the information on domestic violence policies and practices generated from staff at the demonstration sites to better understand the development of programs and/or policies at the SAVES demonstration sites regarding their treatment of clients and cases that involve domestic violence issues and/or safety concerns over the course of the SAVES project.

Less frequent collection of data on the reactions of demonstration site staff to the T/TA services that the SAVES Center provides and the types of T/TA services that demonstration sites want will reduce the SAVES Center's ability to be responsive and helpful. By collecting brief evaluative reactions by demonstration sites at annual meetings and learning community calls, the SAVES Center will be in a strong position to plan and deliver T/TA services that address the interests and needs of the demonstration sites in a timely manner and best support them in their efforts to increase safe access to child support, parenting time, and establishment of parentage services for survivors of domestic violence over the course of the SAVES project.

A7. Now subsumed under 2(b) above and 10 (below)

A8. 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 Experts

We have not consulted with experts outside of the team preparing and fielding this data collection effort.

A9. Tokens of Appreciation

No tokens of appreciation will be offered.

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

Personally identifiable information will not be collected. The data included in the administrative data extract will be randomly generated by child support programs from their automated child support enforcement systems and will be de-identified by child support staff at the demonstration sites before it is shared with the SAVES Center. Each demonstration site will identify and pull the random sample based on their policies and practices. While child support programs include identifiable information in their automated systems (including, but not limited to, dates of birth and addresses), identifiable information will not be included in the administrative data extract. If the demonstration site pulls identifiable information with their random sample, the child support staff at the demonstration site will remove these data elements to ensure that they are only providing the specific data elements requested by the SAVES Center and that the extract is de-identified. Cases and clients in the random samples of cases with and without a family violence flag generated by the demonstration sites during year 3 will not be matched with cases and clients with and without a family violence flag generated in year 5. In both time periods, anonymous statistical groups and sub-groups of clients and cases will be analyzed and compared without reference to personal identifiers.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

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. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information.

Data Security and Monitoring

The SAVES Center meets and exceeds all FedRAMP certifications and security requirements. The SAVES Center will utilize Microsoft 365 E5 subscription to safely protect all data within SharePoint, OneDrive, and access from laptops. Microsoft 365 E5 is a comprehensive subscription that combines productivity apps with advanced security, compliance, and analytical capabilities. The cloud apps and devices that access the data are governed and secured utilizing several security services and features that work together to prevent unauthorized access or data loss. These include:

- MFA and Conditional Access. Multi-Factor authentication is required for both computer and cloud app access. Conditional Access policies prevent login attempts from outside the US.
- Data Loss Prevention. Policies for automatic classification and retention. Also, manual labels can be applied to data to restrict access and prevent sharing.
- Information Protection. This includes Microsoft Purview Advanced Message Encryption, Insider Risk Management, Communication Compliance, Privileged Access Management, and Records Management. Also, Per-File Encryption in OneDrive for Business and SharePoint Online.
- Microsoft 365 E5 Security. This includes Microsoft Defender for Office 365 Plan 2, Microsoft Defender for Endpoint, Microsoft Defender for Identity, Microsoft Defender for Cloud Apps, and Safe Documents. Computers and all cloud apps including email are protected.

The SAVES Center will execute a data-sharing agreement with each SAVES demonstration site prior to the data extraction. The SAVES Center has created a data-sharing agreement template to share with the demonstration sites to facilitate this process (See Appendix A: Data Sharing Agreement Template). Although demonstration sites will have the opportunity to make any necessary edits to this template, the purpose of this template is to create a starting point to advance the data-sharing process and reduce the burden on demonstration sites to generate discrete data sharing documents. The SAVES Center template includes the following information: the purpose and objective of data analysis, privacy requirements, the terms of the agreement, details regarding data destruction, information about data security, and the planned variables for data extraction. The SAVES Center will also complete a demonstration site-specific data sharing applications where relevant.

A11. Sensitive Information [1]

No sensitive information is being requested.

A12. Burden

Explanation of Burden Estimates

The data collection efforts will take place over three years (years 3-5 of the SAVES project). There is variation in terms of number of respondents, number and frequency of responses per respondent, and average burden per response across the four data collection instruments.

For Instrument 1: Child Support Administrative Data Extract, the number of respondents (9) is based on informal individual conversations that the SAVES Center research team had with SAVES demonstration sites on their capacity to extract administrative data from their child support system. These respondents will respond twice, providing administrative data in year 3 and year 5 of the SAVES project. Based on previous administrative data extracts completed by the SAVES research team, and informal individual discussions with SAVES demonstration sites, the estimated time per response is 3 hours.

For Instrument 2: Child Support Policies and Practices Survey, the number of respondents (13) is based on the total number of SAVES demonstration sites. These respondents will respond twice, completing the survey in year 3 and year 5 of the SAVES project. Based on internal completion time by the SAVES Center research team, the estimated time per response is 1 hour.

For Instrument 3: SAVES Center Grantee Meeting T/TA Feedback Survey, the number of respondents (50) is based on the number of attendees at previous SAVES Center Grantee Meetings in year 1 and year 2 of the SAVES Project. These respondents will respond three times, completing the survey after the annual SAVES Center Grantee Meeting in years 3-5 of the SAVES project. Based on internal completion time by the SAVES Center research team, the estimated time per response is 0.25 hours (15 minutes).

[1] Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

For Instrument 4: SAVES Center Learning Community Call T/TA Feedback Survey, the number of respondents (50) is based on the number of attendees at previous SAVES Center Learning Community Calls in year 1 and year 2 of the SAVES Project. These respondents will respond 36 times, completing the survey after the monthly SAVES Center Learning Community Calls in years 3-5 of the SAVES project. Based on internal completion time by the SAVES Center research team, the estimated time per response is 0.05 hours (3 minutes).

Estimated Annualized Cost to Respondents

The estimated costs to respondents were calculated using current data from the Bureau of Labor Statistics. Specifically:

- Instrument 1: The costs associated with the Child Support Administrative Data Extract were estimated using the 2023 median pay for Data Scientists ($51.93 per hour): https://www.bls.gov/ooh/math/data-scientists.htm. To account for overhead and fringe benefits, the rate was multiplied by two ($103.86).
- Instruments 2-4: The costs associated with the three surveys were estimated using the 2023 median pay for Administrative Services and Facilities Managers ($50.44 per hour): https://www.bls.gov/ooh/management/administrative-services-managers.htm. To account for overhead and fringe benefits, the rate was multiplied by two ($100.88).

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Instrument 1: Child Support Administrative Data Extract	9	2	3	6	2	$103.86	$207.72
Instrument 2: Child Support Policies and Practices Survey	13	2	1	2	0.67	$100.88	$67.59
Instrument 3: SAVES Center Grantee Meeting T/TA Feedback Survey	50	3	0.25	0.75	0.25	$100.88	$25.22
Instrument 4: SAVES Center Learning Community Call T/TA Feedback Survey	50	36	0.05	1.80	0.60	$100.88	$60.53
Totals:	**122**			**10.55**	**3.52**	**$406.50**	**$361.06**

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

There will be no costs beyond the normal labor costs for staff.

A15. Reasons for changes in burden

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

A16. Timeline

The collection of data will begin within one month of obtaining OMB approval.

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

- Instrument 1: Child Support Administrative Data Extract
- Instrument 2: Child Support Policies and Practices Survey
- Instrument 3: SAVES Center Grantee Meeting T/TA Feedback Survey
- Instrument 4: SAVES Center Learning Community Call T/TA Feedback Survey
- Appendix A: Data Sharing Agreement Template