Tribal TANF Institutional Review Board (IRB) Outreach

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:** This data collection effort will involve outreach to contacts at 76 Tribal TANF programs to inquire about their tribe's process for reviewing and approving research and evaluation activities on tribal land and/or with tribal citizens. Federally recognized tribes are independent sovereign nations, and many have established their own processes for oversight of research activities on their land and with their citizens. In order to ethically and respectfully conduct research and other information collections related to ACF Tribal programs, ACF needs to understand and abide by the necessary tribal approval processes. The Administration for Children and Families (ACF) will use the collected information to inform the approval process for a current Office of Planning, Research, and Evaluation (OPRE) research project, *Next Steps for Tribal TANF Research and Data*. The information collection will also inform future ACF and OPRE research, evaluation, and technical assistance projects and other future activities related to tribal programs. We do not intend for this information to be used as the principal basis for public policy decisions.

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

A1. Necessity for Collection

Federally recognized tribes are independent sovereign nations, and many have established their own processes for oversight of research activities on their land and with their citizens. In order to ethically and respectfully conduct research and other information collections related to ACF Tribal programs, ACF needs to understand and abide by the necessary tribal approval processes. This information collection is necessary to learn about the different processes for reviewing and approving research, evaluation, and other data collection activities on tribal land and/or with tribal citizens for each of the 76 federally recognized Tribal TANF programs. Without this information, ACF will not be able to conduct research, evaluation, or technical assistance activities that involve data collection from tribes.

This information is needed to inform the approval process for a planned Office of Planning, Research, and Evaluation (OPRE) research project, *Next Steps for Tribal TANF Research and Data* (this project will separately submit a full package for its specific data collection plans). The information collection will also inform future ACF and OPRE research, evaluation, and technical assistance projects and other future activities related to tribal programs.

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 information collection is to learn about the different processes for reviewing and approving research, evaluation, and other data collection activities on tribal land and/or with tribal citizens for each of the 76 federally recognized Tribal TANF programs. ACF will reach out directly to contacts at 76 federally recognized Tribal TANF programs to inquire about their tribe's specific research and evaluation approval process.

ACF will use the collected information to inform future engagements with tribes. This outreach will reference – and the information collected will be used to inform – a planned OPRE project, *Next Steps for Tribal TANF Research and Data*, which plans to gather input from tribal communities on next steps for Tribal TANF research, data, and technical assistance (this project will separately submit a full package for its specific data collection plans). The information collection will also inform future ACF and OPRE research, evaluation, and technical assistance projects and other future activities related to tribal programs.

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

- Obtaining feedback about processes and/or practices to inform ACF program development, including development of learning agendas and research and technical assistance priorities.

The information collected 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.

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

Guiding Question

- For the 76 federally recognized tribes that operate Tribal TANF programs, what is the process by which external researchers may obtain tribal approval for research, evaluation, and other data collection activities?

Information Collection Procedures and Processes

ACF will reach out directly to contacts at the 76 federally recognized Tribal TANF programs. First, ACF will send a letter signed by the Division Director of the Tribal TANF Management and Regional Operations. This letter (Appendix A) will introduce the *Next Steps for Tribal TANF Research and Data project* and give Tribal TANF program contacts a heads up that they will be contacted by the study team. Then, the study team will send a letter (Appendix B) inquiring about the process for gaining Tribal approval. The letter will include a link to a short survey (Instrument 1) asking questions about Tribal approval. If necessary, the study team will send a reminder email to complete the survey (Appendix C). The study team may do individualized follow-up with Tribes, depending on the responses to the survey.

Data Collection Activity	*Instrument*	*Respondent, Content, Purpose of Collection*	*Mode and Duration*
Survey and individualized follow-up	Instrument 1: Tribal Research Approval Process Survey	**Respondents**: Tribal TANF program directors or their designees **Content**: Questions asking what Tribal TANF directors know about research approval processes for their tribe **Purpose**: To learn about each tribe's process for reviewing and approving research and evaluation activities on tribal land and/or with tribal citizens	**Survey mode**: Online survey **Survey duration**: 10 minutes **Follow-up mode**: Virtual (phone or videoconferencing) **Follow-up duration:** Up to one hour, on an as-needed basis

Other Data Sources and Uses of Information

ACF will combine responses to the survey with publicly available information (for example, if a Tribal TANF Director reports that their tribe uses a particular IRB, we will look for publicly available information on how to seek approval from that IRB).

The information collected will be used to inform a planned OPRE project, *Next Steps for Tribal TANF Research and Data*, which plans to gather input from tribal communities on next steps for Tribal TANF research, data, and technical assistance (this project will separately submit a full package for its specific data collection plans). The information collection will also inform future ACF and OPRE research, evaluation, and technical assistance projects and other future activities related to tribal programs.

A3. Use of Information Technology to Reduce Burden

ACF will use a web-based survey platform to collect responses for the survey. This will reduce burden for respondents by programming skips for nonapplicable questions, enabling them to submit responses efficiently and on their own time, and save their work and continue later if they are not able to complete their response at once.

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

Based on our consultations with federal colleagues and external experts, we are not aware of any existing data that would meet the goals of this information collection.

A5. Impact on Small Businesses

No small businesses will be involved with this information collection.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

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 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 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.

ACF is currently in the process of extending approval of the umbrella generic and published a notice in the Federal Register announcing the agency's intention to request an extension of approval from OMB. No changes are proposed. The notice was published on April 28, 2025 (90 FR 17603) announcing a sixty-day period for public comment. ACF has not received any comments on the first notice. A second notice will be published in coordination with submission of the extension request to OMB. If data collection for this specific request is ongoing at that time, the request will be included in that extension request.

Consultation with Experts

We consulted with a work group of Tribal TANF experts who were convened to advise on the *Next Steps for Tribal TANF Research and Data* study. They affirmed that Tribal approval would be needed for all study activities, and that it would be most respectful to begin with this kind of outreach to individual Tribal TANF programs.

A9. Tokens of Appreciation

No tokens of appreciation are proposed for this data collection.

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

Personally Identifiable Information (PII)

Information collected includes the name of the Tribal TANF program that the respondent is associated with and contact information for individualized follow up as needed based on responses.

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 Contractor conducting this information collection will protect respondent privacy and will comply with all Federal and Departmental regulations for private information. The Contractor has developed a Data Security Plan that assesses all protections of respondents' PII. The Contractor has ensured that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. Beginning in FY 23, all awarded contracts are required to go through the Assessment and Accreditation (A&A) process and obtain a three (3) year Authority to Operate (ATO) if required by ACF/OCIO.

As specified in the evaluator's contract, the Contractor shall use Federal Information Processing Standard (FIPS) and National Institute of Standards and Technology (NIST) Special Publication (SP) 800.53 rev 5 compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current NIST requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or PII that ensures secure storage and limits on access.

A11. Sensitive Information [1]

[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

This information collection will not collect sensitive information.

A12. Burden

Explanation of Burden Estimates

The table below shows estimated burden for the information collection. We estimate that reading the introductory emails and completing the survey will take no more than ten minutes. We estimate that the individualized follow-up conversation will take no more than one hour. We have estimated burden for 76 individuals, which is the number of Tribal TANF program directors we will include in our outreach.

Estimated Annualized Cost to Respondents

For Tribal TANF program directors, we estimate hourly wages based on the May 2024 U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Statistics.[2] We calculated a $41.39 hourly wage based on the mean wages for "Social and Community Service Managers" (11-9151). To account for overhead and fringe benefits, the wage was multiplied by two ($82.78).

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total/ Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Instrument 1: Tribal Research Approval Process Survey and follow-up	76	1	1.17	88.92	$82.78	$7360.80

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

The estimated total cost for the data collection activities under this current request is approximately $8,397.22. The estimate includes the costs of project staff time to collect the information and analyze the responses.

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

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.

[2] https://www.bls.gov/oes/current/oes_nat.htm

Activity	Date
Outreach to Tribal TANF Program Directors	Within one month of OMB approval

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Appendix A: Outreach Email from OFA to Tribal TANF Programs

Appendix B: Email to Tribal TANF Programs Requesting Study Approval Information

Appendix C: Reminder Email to Tribal TANF Programs Requesting Study Approval Information

Instrument 1: Tribal Research Approval Process Survey