Formative Data Collections for Administration for Children and Families (ACF) Program Support

OMB Information Collection Request
0970 - 0531

Supporting Statement

Part A

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Submitted By:
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Overview of request: The Formative Data Collections for Administration for Children and Families (ACF) Program Support generic was created to allow ACF program offices to learn more about program-related services, including processes and needs of funded programs or grant recipients, those served by ACF programs, or others experienced with or interested in ACF programs. The goal is to improve ACF decision-making, program support, and support for or relationships with those with interest in ACF programs.

The generic was approved as a new overarching generic in July 2019. The Formative Data Collections for ACF Program Support generic has proved very useful for program offices to collect formative information to support programs, such as information about what programs and grant recipients are doing in response to unexpected events, what needs programs or grant recipients may have so ACF can provide appropriate support, to gather feedback on performance measures for funding recipients, etc.

This current request is to extend approval of the Formative Data Collections for ACF Program Support for an additional three years. The proposed types of generic information collections (GenICs), the purpose of the GenICs, and the general uses of information collected remain the same, but we have made minor revisions to the supporting statements for clarification and to align with current administration priorities.

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), requests approval to continue use of this overarching generic clearance to allow ACF to conduct a variety of formative data collections.

ACF programs promote the economic and social well-being of families, children, individuals, and communities. To ensure involvement with a variety of people with diverse experiences and perspectives with ACF programs, ACF must actively collect information to learn more about program services that ACF funds, or similar to those funded. This information is necessary for ACF to gain a better understanding of processes, needs, and potential improvements related to ACF programs and associated services to inform ACF decision-making and program support.

Under this generic clearance, ACF engages in a variety of formative data collections with respondents such as: current or prospective service providers, training or technical assistance (T/TA) providers, grant recipients, contractors, current and potential participants in ACF programs or similar comparison groups, experts in fields pertaining to ACF programs, key groups involved in ACF projects and programs, individuals engaged in program re-design or demonstration development for evaluation, state or local government officials, or others involved in or prospectively involved in ACF programs whose engagement could directly inform the improvement of ACF programs. The goals of the generic information collections (GenICs) under this approval are to: obtain information about program and grant recipient processes or needs, and to inform a variety of activities. The following are example activities that may be informed by information collected through GenICs.

- Delivery of TA and/or workflows related to program implementation or the development or refinement of program and grant recipient processes. This could include the development and refinement of recordkeeping or communication systems.
    - Example requests could include information collections from grant recipient staff or program participants regarding current (or planned) grant recipient processes, with the goal of improving processes or provision of assistance based on feedback from respondents.
- Planning for provision of programmatic or evaluation-related T/TA.
    - Example requests could include T/TA needs assessment questionnaires or surveys; requests to share information about promising strategies or approaches; requests for information from grant recipients about local evaluation plans for purposes of providing evaluation TA.
- Obtaining input on the development of program performance measures (PM) from grant recipients or experts in a relevant field (such as development of PMs for programs focused on a specific population served by ACF.
    - Example requests could include focus groups or surveys designed to obtain input on perceived usefulness of measures, or cognitive testing of measures.

- Obtaining feedback about processes and/or practices to inform ACF program development or support.
    - Example requests could include focus groups, interviews or surveys designed to obtain information about practices at organizations or programs related to ACF programs. Any solicited information under this generic clearance umbrella would have direct relationship to ACF program improvement. Broader work that does not directly inform ACF program development or support would be conducted through a stand-alone ICR.
- Use of rapid-cycle testing activities to strengthen programs in preparation for summative evaluation.
    - Example requests could include data collection from program staff or participants, observation of program activities[1], or review of existing program data.[2]
- Development of learning agendas and research priorities.
    - Example requests could include focus groups or surveys designed to obtain input on priorities for future research, evaluation, and improvement activities aimed at informing learning agendas.
- 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.
    - Example requests could include surveys to grant recipients requesting information about service providers; requests to states/territories or programs to request information about programs or systems; requests for information about specific models or methods used; requests for citations of work using ACF-funded research.

To reach these goals, ACF uses a variety of techniques such as semi-structured discussions, focus groups, surveys, templates, open-ended requests, and telephone or in-person interviews.

Under this generic clearance, ACF collects information from more than 9 respondents that can inform the support of ACF programs. These information collections may not be highly systematic and are not intended to be statistically representative or otherwise generalizable. The general methods covered by this clearance are described in this justification package. Also outlined are the proposed procedures for keeping OMB informed about the various types of data collections, and the nature of the activities being conducted.

[1] Unless observation includes direct involvement from the observed individuals, these activities will be described in the justification package but will not be included in the estimated burden for a GenIC.
[2] If documents or records are requested in a format in which they already exist, these activities will be described in the justification package, but will not be included in the estimated burden for a GenIC.

Legal or Administrative Requirements that Necessitate the Collection

ACF proposes these information collections at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach

All the methods and the data collections approved under this clearance will be used for the purposes of informing ACF's decision-making around program support. These formative information collections help ensure that ACF provides effective and efficient program support.

The findings from the GenICs are meant to inform ACF activities and may be incorporated into documents or presentations that are made public. As appropriate, information may be published for purposes of transparency and to provide information to those with an interest in ACF programs, such as grant recipients, policymakers, or clients. See section A16 for additional information.

The specific types of information gathering methods included under the umbrella of this clearance are varied. ACF will submit individual GenIC requests under this clearance, which will include:

- A full Supporting Statement A and, if appropriate, a Supporting Statement B[3], to include the following:
    - Intended use(s) of the information collection.
    - Demonstration of the fitness of purpose between the proposed collection and its intended use(s).
    - Specific population of focus.
    - Contextual information about the information collection, including any potential barriers or facilitators.
    - If appropriate for the type of request, a description of the analytic method(s) used to include the strengths and limitations of the method(s) for the purpose of the study.
    - Information about how data will be communicated and shared.
    - Notification that the data collection is primarily for internal program purposes; it is not meant to support policy recommendations and the findings are not meant to be generalizable. Any plans for sharing information (as described in A16) will be clearly detailed.
- Instruments, protocols, and relevant supplementary materials.

[3] If no statistical methods and analyses are planned or appropriate for the type of collection (ex. informing T/TA), only a Supporting Statement A will be included with the request.

Following standard Office of Management and Budget (OMB) requirements, ACF has and will continue to submit to OMB the above information about individual GenIC activities proposed under this generic clearance. See Reginfo.gov (https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0531) for examples of instruments previously approved under this generic clearance.

ACF will make separate submissions for clearance of full, non-developmental data collection efforts.

ACF understands that OMB will make every effort to review materials for individual generic information collection requests ***within 10 working days*** of submission.

ACF will provide a report summarizing the number of hours used, as well as the nature and results of the activities completed under this clearance with subsequent overarching generic information collection renewals. This revision includes this information in Attachments A and B.

Study Design and Universe of Data Collection Efforts

Under this clearance, ACF uses a variety of approaches. The exact data collection methods and the samples for each GenIC depends on the project. The particular samples vary based on the content of the collection and the programs or policies of interest. These formative studies collect data using well-established methodologies, including:

- **Semi-structured discussions or conference calls**: Semi-structured discussions or conference calls with multiple participants are conversations between data collectors and one or more informants around a series of topics, potentially including probing questions and follow-up questions. This may include listening sessions or similar semi-structured discussions during which information is requested. Unlike a structured survey, where the interview follows a prescribed set of questions or a script, semi-structured discussions are designed to be more flexible and responsive to the direction of the conversations prompted by the respondent's comments. Semi-structured discussions are useful because they allow for an interactive approach to information gathering, while maintaining some consistency across respondents.

- **Focus groups**: This method involves group sessions guided by a moderator who follows a topical outline containing questions or topics focused on a particular issue, rather than adhering to a standardized questionnaire. Focus groups can be more efficient than individual interviews, since multiple individuals participate at one time. In addition, the group dynamics can yield richer responses than individual interviews for some types of topics.

- **Telephone or in-person interviews**: Interviews are one of the oldest and most widely used methods of data collection. Typically structured around a prescribed set of questions, interviews can be done over the phone or face-to-face. With technological

advances, telephone interviews have become an efficient source of systematic data collection.

- **Questionnaires/Surveys:** Questionnaires are common and popular tools to gather data from multiple people. Information from a questionnaire can inform research and evaluation planning as well as program support. Questionnaires may be used to gather information about specific programs or populations served by ACF (i.e., program processes, needs assessments, cost workbooks, etc.).

- **Templates:** Templates are generally sample documents that request information in a specific format. This could be used to complete logic models or to collect information to inform technical assistance activities in a standard format.

- **Open-ended requests:** Open-ended requests could include requests for specific information in an unspecified format. For example, a request for specific information that would include instructions and a list of specific items requested, but no specific format specified.

- **Direct Observation:** Direct observation yields detailed descriptions of the activities, actions, and behaviors of individuals; interpersonal interactions; settings; and organizational processes and procedures. Unless observation includes direct involvement from the observed individuals, these activities will be described in the justification package but will not be included in the estimated burden for a GenIC[4].

- **Document analysis:** Document analysis is often conducted to understand contextual information. Document analysis may include, but is not limited to, organizational or programmatic records, grant recipient applications, progress reports, and public reports and records. If documents or records are requested in a format in which they already exist, these activities will be described in the justification package but will not be included in the estimated burden for a GenIC.

Respondents could include current or prospective service providers, T/TA providers, grant recipients, contractors, current and potential participants in ACF programs or similar comparison groups, experts in fields pertaining to ACF programs, other key groups involved in ACF projects and programs, individuals engaged in program re-design or demonstration development for evaluation, state or local government officials, or others involved in or prospectively involved in ACF programs.

A3. Improved Information Technology to Reduce Burden

[4] Per 44 USC, 5 CFR 1320.3: Definitions: …***"Information" does not generally include*** *items in the following categories*…(3) Facts or opinions obtained through **direct observation** by an employee or agent of the sponsoring agency or through nonstandardized oral communication in connection with such direct observations. . . ." (emphasis added).

ACF and its contractors will employ information technology as appropriate to reduce the burden of respondents who agree to participate. We will provide specific information about the use of technology for each individual GenIC.

A4. Efforts to Identify Duplication

This research will not duplicate any other work by ACF. ACF program offices collaborate regularly and will continue to collaborate to prevent any duplication of information collection efforts. The purpose of this clearance is to better inform and improve the quality of ACF's program support. Data gathering under this request would not be feasible without this generic clearance due to the time constraints of seeking clearance for each individual data collection. To the maximum extent possible, we will make use of existing data sources before we attempt to utilize the additional fieldwork sought under this clearance. These efforts will be described in each individual GenIC.

A5. Involvement of Small Organizations

The research to be completed under this clearance is not expected to impact small businesses. If an individual collection involves small organizations, the justification package will include a discussion to address this involvement.

A6. Consequences of Less Frequent Data Collection

ACF anticipates that the majority of information collections under this generic clearance will involve a one-time data collection. Rapid-cycle information collections will involve iterative collections in an effort to collect feedback, make changes to processes, and collect information to assess the changes. Less frequent data collection would mean that program support would be less responsive to the needs of ACF programs and clients. Information about the frequency of data collection will be described in each individual GenIC.

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 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 April 28, 2025, (90 FR 17603) 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.

Consultation with Experts Outside of the Study

Consultation with staff from ACF contractors carrying out information collections will occur in preparation for and in conjunction with the fielding of the data collections under this request. We may consult with experts or others with experience with ACF and similar programs, as appropriate. Relevant information about consultations will be included with each GenIC request.

A9. Tokens of Appreciation for Respondents

Per OMB guidance, tokens of appreciation are generally not appropriate for contractors, cooperators, grant recipients, or program participants because they already have a pre-existing relationship with the agency. Tokens of appreciation are most appropriate where participants are being asked to travel to a site to participate in a focus group or cognitive interview. Tokens of appreciation are generally not appropriate for questionnaires/surveys.

If a token of appreciation is proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual information collection request. Per the Office of Information and Regulatory Affairs, Office of Management and Budget guidance document *Questions and Answers when Designing Surveys for Information Collections* (Updated Oct 2016), justifications will focus on data quality, burden on the respondent, past experience, improved coverage of specialized respondents, rare groups, or minority populations; reduced survey costs; and/or equity. Participants may be offered a monetary token of appreciation to account for incidental expenses (transportation, data use, etc.).

If tokens of appreciation are proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual GenIC request. Each justification will cite the research literature that demonstrates significant improvements in response rates and non-response bias when applied to similar participants, data collection methods, and data collection contexts. Where no evidence is available, ACF may propose a field test or experiment to evaluate the effects of the incentive.

A10. Privacy of Respondents

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.

Individual statements will be included with each GenIC request submitted under this clearance, but in general, ACF and/or the contractor or grant recipient performing the data collection (data collection team) shall protect respondent privacy to the extent permitted by law and will comply

with all Federal and Departmental regulations for private information. The data collection team will ensure that all individuals who perform work on the data collection are trained on data privacy issues and comply with the above requirements. Any specific pledges evaluation staff must sign will be described in individual GenIC requests.

As necessary, data collection teams shall use Federal Information Processing Standard (currently, FIPS 140-2) compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The data collection team shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The data collection team shall, as applicable: ensure that this standard is incorporated into the property management/control systems; 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 National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, a 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 personally identifiable information that ensures secure storage and limits on access.

Most commonly information will not be maintained in a paper or electronic system from which they are actually or directly retrieved by an individuals' personal identifier. Each GenIC will provide information about personally identifiable information and privacy.

A11. Sensitive Questions

Most of the questions that will be included in these activities will not be of a sensitive nature. However, it is possible that some potentially sensitive questions may be included under this clearance. For example, some ACF programs deliver services that are sensitive in nature, such as programming for Adolescent Pregnancy Prevention, Family Violence Prevention, or collections related to Trafficking in Persons. For proposed collections that include questions of a sensitive nature, ACF will provide a full explanation when submitting an individual GenIC request.

A12. Estimation of Information Collection Burden

Previously Approved Information Collections

This generic was most recently approved for a total of 40,500 new burden hours and 13,652 hours for ongoing data collection.

At the time of this extension request, 32 GenICs are ongoing, with a total of 7,287 burden hours. See Attachment B for all previously approved, ongoing GenICs. Attachment A provides an overview of ACF/OPRE's use of this generic information collection since the 2022 approval and examples of approved ACF information collections.

Newly Requested Information Collections

The estimated burden for this revision is based on experiences since initial approval in 2019. A variety of forms will be used in conducting the research under this clearance, and the exact number of different forms, length of each form, and number of subjects/respondents per form are unknown at this time.

Since approval, this umbrella generic has proven to be a very useful tool for ACF for program improvement purposes, including developing performance measures, understanding grant recipient needs, feedback related to new and updated programs, and potential information collections related to new funding sources. Based on experience to date, the estimated burden for new collections remains the same.

The burden table below is illustrative, based on previous experience. While we will not exceed the total burden cap for this generic, we may use more or less burden within each instrument type.

Total New Burden Requested Under this Umbrella Generic Information Collection

Instrument Type	Estimated Total Number of Respondents	Estimated Number of Responses Per Respondent	Average Burden Hours Per Response	Estimated Total Burden Hours	Average Hourly Wage	Cost per respondent
Semi-Structured Discussions and Focus Groups	10,000	1	2	20,000	$30.36	$607,200
Interviews	4,500	1	1	4,500	$30.36	$136,620
Questionnaires/Surveys	15,000	1.142	.35	6,000	$30.36	$182,160
Templates and Open-ended requests	1,000	1	10	10,000	$30.36	$303,600
			Total	40,500		$1,082,970

Total Burden Requested Under this Information Collection

The total new (30,500 respondents; 40,500 hours) and ongoing (23,432 respondents; 7,287 hours) burden hours requested under this umbrella generic information collection is **30,719 hours**.

Total Annual Cost

To calculate the annualized cost to respondents for the hour burden, we assume that the typical respondent will be social scientists, other recognized national experts, state or local government officials, service providers, grant recipients, contractors, or ACF program participants. Based on

data on our expected respondents from the Bureau of Labor Statistics and the federal minimum wage, we use a mean hourly wage of $30.36[5].

A13. Cost Burden to Respondents or Record Keepers

A main benefit of this generic mechanism is for ACF to actively engage the communities served through ACF-funded or similar programs to meet the purposes and uses described throughout this document. To ensure involvement with a variety of people with diverse experiences and perspectives in relevant fields, we may propose to offer participants in specific information collections an honorarium for their time spent providing their expertise and experience. If honoraria are proposed, a detailed justification based on the type of collection, population of respondents, and other circumstances will be provided in the individual GenIC request.

A14. Estimate of Cost to the Federal Government

We estimate the annual costs to the federal government to average around $200,000 per GenIC. Costs will be covered by the individual research and evaluation projects, from their data collection budgets. These costs will be described in individual GenIC requests.

A15. Change in Burden

This request is to extend approval of this overarching generic (OMB #0970-0531) to allow ACF to continue to collect information as described in this supporting statement. The purpose and use of the requests proposed under this generic remains the same. The change in burden reflects the number of ongoing data collections at this time, which varies at any point in time throughout a three-year approval time. The total estimated new burden remains consistent, but the estimates were slightly adjusted based on experience over the past three years.

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

Due to the nature of this clearance, there is no definite or tentative time schedule at this point. We expect work to continue more or less continuously throughout the duration of the clearance. For each individual GenIC request, we will provide OMB with an overall project schedule. The Agency will develop individual timelines for projects involving generic clearances based on an understanding that OMB/OIRA will ***review within 10 working days*** of receiving the information collection request.

Under this umbrella generic IC, information is meant to inform ACF activities and may be incorporated into documents or presentations that are made public such as through conference presentations, websites, or social media.

[5] This is an average of the mean hourly wages for social scientists ($51.17), state government officials ($29.61), local government officials ($27.86), and social service occupation ($35.91), and program participants ($7.25).

The following are some examples of ways in which we may share information resulting from these data collections: technical assistance plans, presentations, infographics, project specific reports, or other documents relevant to the field, such as federal leadership and staff, grant recipients, local implementing agencies, and/or T/TA providers. We may also request information for the sole purpose of publication in cases where we are working to create a single source for users (clients, programs, researchers) to find information about resources such as services in their area, TA materials, different types of programs or systems available, or research using ACF data.

In sharing findings, we will describe the study methods and limitations regarding generalizability and as a basis for policy. Any planned uses, including for publication or sharing of information from this IC will be described and submitted for approval in each individual GenIC.

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.