

Formative Data Collections for Policy Research

**OMB Information Collection Request
0970 - 0356**

Supporting Statement

Part A

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A1. Necessity for the Data Collection

The Office of Planning, Research and Evaluation (OPRE), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), seeks renewal of this generic clearance to allow OPRE to conduct a variety of formative data collections. Over the next three years, OPRE anticipates undertaking a variety of new research projects related to welfare, employment and self-sufficiency, Head Start, child care, healthy marriage and responsible fatherhood, family and youth services, home visiting, and child welfare. Under this generic clearance, OPRE would engage in a variety of formative data collections with researchers, practitioners, TA providers, service providers and potential participants throughout the field to fulfill the following goals: (1) inform the development of OPRE research, (2) maintain a research agenda that is rigorous and relevant, (3) ensure that research products are as current as possible and (4) inform the provision of technical assistance. OPRE envisions using a variety of techniques including semi-structured discussions, focus groups, and telephone or in-person interviews, in order to reach these goals.

The ACF Office of Planning Research and Evaluation (OPRE) conducts research on a wide variety of policy and programmatic areas. OPRE's research serves to provide further understanding of current programs and service populations, explore options for program improvement, and assess alternative policy and program designs. Under this generic clearance, ACF/OPRE seeks continued approval to conduct discussions with more than 9 respondents that can inform future research and support current research, but that are not highly systematic or intended to be statistically representative. The specific methods proposed for coverage 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 research activities being conducted.

Study Background

This generic clearance (0970-0356) was originally approved for use in October 2008 and renewed in January 2012. During the first three years of use, information was collected from 214 respondents for 360 hours of burden. Since January 2012, ACF/OPRE was approved to collect information from 1205 respondents for 1501 hours of burden. The increased use is indicative of how useful this formative information collection process has been to informing our research and evaluation projects.

Following standard Office of Management and Budget (OMB) requirements, OPRE has and will continue to submit to OMB information about individual information collection activities proposed under the generic clearance. ACF/OPRE will provide OMB with a copy of the individual instruments or questionnaires, as well as other materials describing the project. See Attachment A for examples of instruments previously approved under this generic clearance.

Legal or Administrative Requirements that Necessitate the Collection

The ACF Office of Planning, Research and Evaluation proposes these information collections at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach

All of the methods and the data collections approved under this clearance will be used for the purposes of informing OPRE's and ACF's internal decision-making, technical assistance, research planning, and contextualization of research findings. The data collected under this clearance may be published if it is of methodological interest.

Since the types of information gathering methods included under the umbrella of the clearance are so varied, it is impossible to specify at this point what kinds of activities will be involved in any particular data collection. However, ACF/OPRE will submit individual generic IC requests under this clearance, which will include a short justification for the collection and all instruments, protocols, and other supplementary materials..

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

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

ACF/OPRE 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. Attachment B provides an overview of ACF/OPRE's use of this generic information collection between January 2012 and the submission date of this renewal request.

Study Design and Universe of Data Collection Efforts

Under this clearance, ACF/OPRE will use a variety of approaches. The exact nature of the questionnaires and the samples is undetermined for each individual collection, but we expect that they will include a variety activities, dependent on the research project. The particular samples will vary based on the content of the discussion and the programs or policies of interest.

- **Semi-structured discussions or conference calls:** Semi-structured discussions or conference calls with multiple participants are conversations between researchers and one or more informants around a series of topics, potentially including probing questions and follow-up questions. 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.

Since a primary goal of the information collections conducted under this clearance is to improve the evaluations of ACF programs and demonstrations, respondents could include key stakeholder groups involved in ACF projects, state or local government officials, service providers, experts in fields pertaining to ACF research, or others involved in conducting ACF research or evaluation projects. In general, we expect that information collections conducted under this clearance will involve a minimum of ten respondents and a maximum of no more than 100 respondents, annualized over the 3 year clearance period.

Attachment A provides examples of previously approved instruments under this generic clearance.

A3. Improved Information Technology to Reduce Burden

ACF/OPRE 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 generic information collection request.

A4. Efforts to Identify Duplication

This research does not duplicate any other work being done by ACF. The purpose of this clearance is to better inform and improve the quality of ACF's research and evaluation, and 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 field work sought under this clearance.

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/OPRE anticipates that all of the information collected under this generic clearance will involve a one-time data collection. If this project were not carried out, the quality of the research and its relevance to public policy and practitioner concerns among a variety of projects would likely suffer.

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 activity. This notice was published on September 15, 2014, Volume 79, Number 178, page 54985, and provided a sixty-day period for public comment. A copy of this notice is attached as Attachment C. During the notice and comment period, no comment(s) were received.

Consultation with Experts Outside of the Study

Consultation with staff from ACF contractors carrying out research and evaluation surveys will occur in preparation for and in conjunction with the fielding of these data collections under this request.

A9. Incentives for Respondents

Gifts of appreciation are unlikely to be provided to respondents for activities conducted under this clearance, unless participants are requested to participate in focus groups or to complete an unusually long interview. For participation in a focus group, a project may offer up to \$75, unless otherwise specifically justified. If an incentive 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.

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 generic information collection request submitted under this clearance, but in general, the contractor performing the data collection shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor shall ensure 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. Any specific pledges evaluation staff must sign, as required by the contractor, will be described in individual information collection requests.

As necessary, the Contractor 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 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 National Institute of Standards and Technology (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 personally identifiable information that ensures secure storage and limits on access.

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 interviews that include questions of a sensitive nature, ACF will provide a full explanation when submitting an individual generic information collection request.

A12. Estimation of Information Collection Burden Previously Approved Information Collections

The last revision of the generic clearance was approved for 1600 burden hours.

Newly Requested Information Collections

The estimated burden for this renewal is based on previous experience, consultation with research contractors with whom we have partnered and also on advice from the OMB Office of Information and Regulatory Affairs. 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. Based on the use between 2012-2015, we request approval of the same level of burden (1600 burden hours), total over the three year period.

Total Burden Requested Under this Information Collection

Instrument	Total Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Semi-Structured Discussion and Information- Gathering Protocol	1,600	1	1	1,600	533	26.99	\$14,386

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 or service providers. Based on data on our expected respondents from the Bureau of Labor Statistics, we use a mean hourly wage of \$26.99¹.

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

Although we cannot anticipate the actual number of participants, length of interview, and/or mode of data collection conducted under this clearance, we estimate cost to the Federal Government based on costs incurred between January 2012 and submission of this current request.

Based on previous costs, we estimate the annual costs to the Federal Government to be around \$150,000. Costs will be covered by the individual research and evaluation projects, from their data collection budgets. These costs will be described in individual information collection requests.

¹ This is an average of the mean hourly wages for social scientists (\$38.68), state government officials (\$24.68), local government officials (\$23.10), and social service occupation (\$21.50).

A15. Change in Burden

This request is to renew the use of the ACF/OPRE formative generic clearance for another three years. There is no change in the level of burden requested.

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 generic information collection 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.

The data collected under this clearance may be published if it is of methodological interest.

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.