

# Pre-testing of ACF Data Collection Activities

OMB Information Collection Request  
0970 - 0355

## Supporting Statement Part A

2024

**Type of Request:** Revision

Submitted By:  
Office of Planning, Research, and Evaluation  
Administration for Children and Families  
U.S. Department of Health and Human Services

4<sup>th</sup> Floor, Mary E. Switzer Building  
330 C Street, SW  
Washington, D.C. 20201

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

## Part A

### **Executive Summary**

- **Type of Request:** This Information Collection Request is for a revision to an umbrella generic: Pre-testing of Evaluation Data Collection Activities. We are requesting 3 years of approval.
- **Progress to Date:** This umbrella generic clearance (0970-0355) was originally approved for use in October 2008 and has been renewed every three years to continue to support ACF's efforts to pretest instruments and procedures to inform research and evaluation work.
- **Description of Request:** This request is to renew ACF's umbrella generic for Pre-testing of Data Collection Activities, with revisions proposed to broaden the scope of the generic to include pretesting of data elements used on information collections that are not specifically for research and evaluation. This includes updates to the title of the umbrella generic, overarching description, and burden estimates. We are also requesting an extension for information collections that are currently approved under this generic and still ongoing.
  - The goal of this umbrella generic is to develop and test information collection materials and procedures.
  - The intended use of the resulting data is to evaluate and improve the quality of the data gathered through ACF's information collections.
  - These pretesting and piloting efforts will collect data using well established methodologies, such as: (a) cognitive and usability laboratory and field techniques, (b) behavior coding (c) exploratory interviews (d) respondent debriefing questionnaires, (e) split sample experiments, (f) focus groups, and (g) pilot studies/pretests.
  - The populations to be studied include participants in ACF programs being evaluated; participants in ACF demonstrations; recipients of ACF grants and individuals served by ACF grantees; comparison group members; and other relevant populations, such as individuals at risk of needing ACF services.
  - Data will be analyzed using well established methods, such as data tabulations to evaluate the results of testing.

We do not intend for the information collected under this umbrella generic to be used as the principal basis for public policy decisions, but we do expect information to inform updates to ACF information collections, potentially including the adoption of pretested questions consistently to improve data quality.

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

### **A1. Necessity for Collection**

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks renewal of this generic data collection development clearance to allow us to use samples of more than nine participants in applying methods useful for identifying data collection material and procedural problems, and pretesting questions and procedures. This will allow for identification of solutions and measuring the relative effectiveness of alternative solutions and for identification of appropriate questions to meet the intended purposes and uses of data collection efforts.

The ACF Office of Planning, Research, and Evaluation (OPRE) studies ACF programs, and the populations they serve, through rigorous research and evaluation projects. These include evaluations of existing programs, evaluations of innovative approaches to helping low-income children and families, research syntheses and descriptive and exploratory studies. This umbrella generic was originally written and has been used for pretesting research and evaluation data collection efforts primarily by OPRE.

ACF program offices also collect data for a variety of purposes including but not limited to performance reporting and monitoring of funding recipients; understanding of the populations served including who they are, what their needs are, and how we can serve them better; program and service improvement feedback; research and evaluation; etc. For this reason, ACF proposes to broaden the scope of this generic to include pretesting of data elements used on information collections that are not specifically for research and evaluation. This could be used to inform a variety of data collection efforts in ACF to allow for consistent data requests across program offices that are high quality and appropriate for program office needs and for respondents who represent ACF program populations.

This generic clearance will continue to allow us to identify if and when an information collection may be simplified for respondents, respondent burden may be reduced, among other possible improvements. The work completed under this generic is intended to be informative in nature; the studies may be iterative, as variation in questions or procedures are proposed, evaluated, and retested. The pretesting of data collection materials is necessary to improve future ACF information collections, resulting in higher quality data with the best possible utility for the government and its stakeholders, when appropriate. The core methodology and target populations will be consistent and burden caps and token of appreciation structure are proposed in this request.

To reflect the described updates, this request includes updates to the title of the request, overarching description, and burden estimates. We are also requesting an extension for information collections that are currently approved under this generic and still ongoing.

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

**Study Background**

This generic clearance (0970-0355) was originally approved for use in October 2008 and has been renewed every three years since. Table A shows the number of respondents and total burden requested for each approval period.

**Table A**

| <b>Timeframe</b>          | <b>Respondents</b> | <b>Total Burden</b> |
|---------------------------|--------------------|---------------------|
| October 2008-October 2011 | 3,605              | 1,336               |
| January 2012-January 2015 | 2,584              | 1,701               |
| May 2018-May 2021         | 538                | 1,114               |
| August 2021-present       | 3,293              | 1,827               |

In the past, ACF has received approval for seven types of activities: (a) cognitive and usability laboratory and field techniques, (b) behavior coding (c) exploratory interviews (d) respondent debriefing questionnaires, (e) split sample experiments, (f) focus groups, and (g) pilot studies/pretests. We expect future activities to fall within these or similar categories.

Example ACF projects that have benefited from this GenIC include activities as part of the Head Start Family and Child Experiences Survey (FACES), and the National Survey of Early Care and Education, among others. See Reginfo.gov (<https://www.reginfo.gov/public/do/PRAOMBHistory?ombControlNumber=0970-0355>) for examples of instruments previously approved under this generic clearance. We anticipate future efforts to include pretesting of Sexual Orientation and Gender Identity (SOGI) questions for youth, those focused on improving language access<sup>1</sup>, among others.

**Legal or Administrative Requirements that Necessitate the Collection**

ACF is undertaking the collections at the discretion of the agency.

**A2. Purpose**

*Purpose and Use*

ACF will use the information collected to develop and test data collection materials and procedures to evaluate and improve the quality of the data gathered by ACF. Assessment of and improvements to information collection materials and/or procedures is the main objective of the activities in this clearance. The goal of developing the data collection materials and refining procedures is to improve ACF data collections.

---

<sup>1</sup> This is a priority area as detailed in Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency" and is required for the ACF Administration for Native Americans (ANA) through the Durbin Feeling Native American Languages Act of 2022 (Pub. L. 117-337), which states that ANA must lead the development and implementation of a nationwide survey on Native languages every 5 years. The development of that survey could be informed through pretesting efforts under this generic.

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

ACF program offices could benefit from use of this pretesting generic for similar purposes as used previously described for research and evaluation efforts. This mechanism would be used to inform the development of data collection activities such as grant recipient forms, forms used by programs on ACF's behalf, and other data collection efforts driven by ACF. This would allow ACF to improve data collection efforts in general, including informing the development of consistent data requests across program offices that are high quality and appropriate program office needs and for respondents who represent ACF program populations. For example, ACF envisions using this mechanism to pre-test SOGI questions with youth. This is an area with minimal research and would benefit ACF program offices that serve youth. Program offices are also considering use of this generic for efforts to support language access for data collections, which a priority as detailed in Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency."

ACF will use the results internally to inform subsequent information collection requests. We do expect information to inform updates to ACF information collections, potentially including the adoption of pretested questions consistently to improve data quality. Information about these efforts may be published to explain data collection decisions or other contextualizing materials. For example, results of these efforts may be made public through methodological appendices or footnotes, reports on data collection development, data collection user guides, descriptions of respondent behavior, and other publications or presentations describing findings of methodological interest. The results of these pre-testing activities may be prepared for presentation at professional meetings or publication in professional journals. Results will be described as exploratory in nature and any limitations will be described. ACF will identify in the GenIC request materials submitted to OMB if publication is likely and describe its purpose.

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.

### *Research Questions or Tests*

Individual Generic Information Collection submissions (GenICs) under this umbrella generic will include the guiding questions for the specific proposed activities.

### *Study Design*

All of the methods proposed for these efforts will be used with either purposive or statistically representative samples of participants in ACF programs being evaluated; participants in ACF demonstrations, many of which are supported by ACF program grants; recipients of ACF grants and individuals served by ACF grant recipients; comparison group members; and other relevant populations, such as individuals at risk of needing ACF services. As appropriate, data tabulations will be used to evaluate the results of testing. All information collection activities conducted under this generic are expected to be voluntary and relatively low burden. They may include iterative testing.

ACF will test a variety of data collection materials and procedures under this clearance. The exact nature of the instruments and the samples is dependent on each individual project and details will be provided

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

for each GenIC request. The particular samples included for each GenIC will vary based on the content of the data collection being tested. Example methods for use under this clearance include the following:

- **Cognitive and Usability Laboratory and Field Techniques**: A qualitative methodology that refers to a set of tools employed to study and identify errors that are introduced during the survey process. These techniques are generally conducted one-on-one with respondents. Cognitive techniques are generally used to understand the question-response process, whereas usability is generally used to understand the physical features of a survey, for instance, its display and navigational features. In concurrent interviews, respondents are asked to think aloud as they actually answer the survey. In retrospective interviews, respondents answer the survey as they would normally, then 'think aloud' afterwards. Other techniques, which are described in the literature and which will be employed as appropriate include: follow-up probing, memory cue tasks, paraphrasing, confidence rating, response latency measurements, free and dimensional sort classification tasks, and vignette classifications. The objective of all of these techniques is to aid in the development of surveys that work with respondents' thought processes, thus reducing response error and burden. These techniques are generally very useful for studying and revising a pre-existing questionnaire. ACF broadened the methodology request to include cognitive interviews at OMB's suggestion in 2012.
- **Behavior Coding**: This test serves as the vehicle for conducting standardized behavior coding of the interaction between the respondent and the interviewer. It involves applying a standardized coding scheme at the completion of a field interview, either by a coder using a tape-recording of the interview or by an observer at the time of the interview. The coding scheme is designed to identify situations that occur during the interview that reflect problems with the questionnaire. For example, if respondents frequently interrupt the interviewer before the question is completed, the question may be too long. If respondents frequently give incomplete answers, this suggests there may be some other problems with the question. An objective of standardized field tests is to collect data derived from standardized coding schemes to identify problem areas in a questionnaire in an objective and reliable manner.
- **Exploratory Interviews**: A technique where interviews are conducted with individuals to gather information about a topical area. These may be used in the very early stages of developing a new survey. They may cover discussions related to administrative records, subject matter, definitions, etc. Exploratory interviews may also be used to investigate whether there are sufficient issues related to an existing data collection to consider a redesign.
- **Respondent debriefing questionnaires**: In this method, standardized debriefing questionnaires are administered to respondents who participated in a field test. The debriefing form is administered at the end of the questionnaire being tested and contains questions that probe to determine how respondents interpret the questions and whether they have problems in completing the survey/questionnaire. This structured approach to debriefing enables quantitative analysis of data from a sample of respondents to learn whether respondents can answer the questions and whether they interpret them in the manner intended by the questionnaire designers. Interviewer debriefing enhances a standardized field test since it utilizes the knowledge of the survey staff that have the closest contact with respondents.

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

- **Split sample experiments:** This method involves testing alternative versions of questionnaires, some of which may be designed to address problems identified in draft questionnaires or questionnaires from previous survey waves. The use of multiple questionnaires is a critical component in this type of data collection, which can include mail, telephone, or personal visit interviews or group sessions at which self-administered questionnaires are completed. Comparison of revised questionnaires against a randomly assigned control version facilitates statistical evaluation of the performance of alternative versions of the questionnaire. In any split sample experiments conducted under this clearance, alternative questionnaire versions will be tested. The number of versions tested and the number of cases per version will depend on the objectives of the test. We cannot specify with certainty a minimum panel size, although we would expect that no questionnaire versions would be administered to less than approximately forty persons or more than 100 persons in a split sample test.
- **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 are useful for surfacing and exploring a range of issues that may be relevant to development and administration of a survey.
- **Pilot Studies/Pretests:** These methodologies are used to test a preliminary version of the data collection instrument. Pretests are used to gather data to refine questionnaire items and scales and assess reliability or validity. Pilot studies are also used to test aspects of implementation procedures in addition to testing survey measurement issues. The sample may be purposive in nature, or limited to particular groups for whom the information is most needed. Alternatively, small samples can be selected to statistically represent at least some aspect of the survey population.

### *Procedures for Clearance*

Since the types of instruments included under the umbrella of the clearance are so varied, we cannot specify at this point the exact activities that will be involved in any particular GenIC. With each GenIC, we will provide OMB with a copy of instruments, supplementary materials, and a brief justification package in advance of any testing activity. When split sample experiments are conducted, either in small group sessions or as part of a field test, all the questionnaires to be used will be provided. When iterative testing is conducted, initial instruments will be submitted for review and a clear description of the plan provided. Unless otherwise described and approved, after approval any revised materials will be uploaded to ROCIS as a nonsubstantive change between each round of testing. A memo will detail any changes.

ACF understands that OMB will make every effort to review materials for individual generic information collection requests expeditiously. If it is determined during OMB review that additional public consideration would be beneficial, ACF will agree to post a 30-day FRN to solicit public comment. All information gathered from these testing activities will be for the purpose of improving data collection materials and procedures, not for the purpose of generating findings on the substantive topic under

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

study. ACF will make separate information collection requests for full, non-developmental data collection efforts.

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. Attachment A provides an overview of ACF's use of this generic information collection between August 2021 and the submission date of this renewal request.

### *Other Data Sources and Uses of Information*

Individual GenICs will include information, as appropriate, about how the information collected may be used in concert with other sources of information (e.g., administrative data sources, prior data collections).

### **A3. Use of Information Technology to Reduce Burden**

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

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

The proposed activities under this umbrella generic will not duplicate any other data collection design work being done by ACF. The purpose of this clearance is to better inform and improve the quality of ACF's data collection requests. Pre-testing of the scale envisioned here would not be done under other circumstances due to the time constraints of seeking clearance for each individual project's pre-testing plan. To the maximum extent possible, we will make use of previous information by reviewing results of previous evaluations of survey data before we attempt to revise questionnaires using additional field work sought under this clearance.

### **A5. Impact on Small Businesses**

The information collection activities proposed under this clearance are not expected to impact small organizations. If an individual collection involves small organizations, the GenIC justification package will include a discussion to address this involvement.

### **A6. Consequences of Less Frequent Collection**

This generic clearance involves data collection and procedure development activities for each study that is connected with the clearance. This may include one-time collections, follow-up requests, or iterative testing, based on the specific situation. In all cases, without the proposed information collection activities, the quality of the data collected for ACF studies would suffer.

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

### **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 activity. This notice was published on June 20, 2024 (89 FR 51888) and provided a sixty-day period for public comment. During the notice and comment period we received requests for information about the umbrella generic but did not receive any comments.

#### *Consultation with Experts Outside of the Study*

Consultation with staff from ACF contractors carrying out the data collections or with other experts may occur in preparation for and in conjunction with the development and fielding of these GenICs. Information about consultation for individual development activities will be provided in GenIC requests.

### **A9. Tokens of Appreciation**

Tokens of appreciation may be provided when appropriate to respondents for activities conducted under this clearance. The type and amount will depend on the types of data collection and the specific population involved. Respondents for activities conducted in the laboratory (that is, cognitive interviews and focus groups) under this clearance are likely to receive a token of appreciation. Respondents for methods that are relatively low in burden may not receive a gift in appreciation unless there are extenuating circumstances that warrant it, in which case this will be discussed in the individual justification package. For example, it is common for any collection over 90 minutes to provide participants with a token of appreciation to account for incidental expenses (transportation, child care, lost wages, etc.).

Not all individual information collections under this generic clearance will provide tokens of appreciation. 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 GenIC request.

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

#### *Personally Identifiable Information*

Individual GenICs under this umbrella generic may request personally identifiable information (PII), as appropriate. This is most commonly used for contacting individuals. If a GenIC proposes to collect PII,

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

the individual justification package will include information about what specific PII will be requested and the proposed uses of the PII.

### *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.

Information specific to each GenIC will be included in the submission, but in general, the project team (ACF or entities collecting information on ACF's behalf, such as a contractor or subcontractor) shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The project team will ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work for each information collection, are trained on data privacy issues and comply with the above requirements. If evaluation staff must sign privacy pledges, these will be referenced in the individual GenIC requests.

### *Data Security and Monitoring*

As necessary, the project team 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 project team shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The project team 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 project team must have 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**<sup>2</sup>

Most of the questions included in these pre-testing activities will not be of a sensitive nature. However, it is possible that some potentially sensitive questions may be included in data collection materials tested 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

---

<sup>2</sup> 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.

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

collections related to Trafficking in Persons. One of the purposes of the testing is to identify such questions, determine sources of sensitivity, and alleviate them as much as possible before the actual request is fielded/made. Information about and justification for any sensitive questions will be included in the justification statement for each GenIC request. Additionally, materials to respondents will be very clear about the purpose of the information collection and how the information will be used specifically for improvement processes.

**A12. Burden**

*Explanation of Burden Estimates*

At the time of this submission, there are two approved GenICs with ongoing information collections. The burden associated with these collections, 963 hours, is detailed in table 12.1.

Burden estimates for future collections (see table 12.2) reflect the broadened scope from primarily used by OPRE for research and evaluation to include ACF program office pretesting of data elements used on information collections that are not specifically for research and evaluation. Estimates have been informed by program office input and are consistent with estimates for other ACF-wide umbrella generics (for example, OMB #s 0970-0531 and 0970-0630).

**Table 12.1: Burden Approved for Ongoing GenICs**

| GenIC Title   | Instruments  | No. of Respondents | No. of Responses per Respondent | Avg. Burden per Response (in hours) | Total Burden (in hours) |
|---|--|--------------------|---------------------------------|-------------------------------------|-------------------------|
| <b>Measuring Self- and Co-Regulation in Sexual Risk Avoidance Education Programs Phase 1</b>  | Instrument 1. Youth Self-Assessment Pre- and Post-Program Survey Version A | 150                | 2                               | .17                                 | 51                      |
|   | Instrument 2. Youth Self-Assessment Pre- and Post-Program Survey Version B | 150                | 2                               | .17                                 | 51                      |
|   | Instrument 3. Youth Self-Assessment Pre- and Post-Program Survey Version C | 150                | 2                               | .17                                 | 51                      |
| GenIC Respondents and Burden Hours:   |  | <b>450</b>         |                                 |                                     | <b>153</b>              |
| <b>Supporting and Strengthening the Home Visiting Workforce (SAS-HV): Testing and Validation of a Draft Measure of Reflective Supervision for Home Visiting</b> | Participant and Contextual Characteristics Questionnaire                   | 120                | 1                               | 0.08                                | 9.6                     |
|   | Focus groups for exploring relevance among racial and ethnic subgroups     | 45                 | 1                               | 1                                   | 45                      |
|   | Web-based pilot testing of reflective supervision measure                  | 500                | 1                               | 1                                   | 500                     |
|   | Repeated measures supervisor subsample                                     | 40                 | 9                               | 0.5                                 | 180                     |

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

|   |   |              |     |      |                |
|---|---|--------------|-----|------|----------------|
|   | Home visitor survey (for supervisees of repeated measures supervisors)  | 120          | 1   | 0.5  | 60             |
|   | Focus groups with qualitative subsample   | 15           | 1   | 1    | 15             |
| <b>GenIC Respondents and Burden Hours:</b>  |   | <b>785</b>   |     |      | <b>809.6</b>   |
| <b>Measuring Self- and Co-Regulation in Sexual Risk Avoidance Education Programs - Part 2</b> | Instrument 1. Youth Screener for Cognitive Interviews and Pilot Survey  | 450          | 1   | 0.08 | 36             |
|   | Phase 1. Instrument 2. Cognitive Interview Protocol and Instrument 3, version A. Youth Self-Assessment Survey | 32           | 1   | 1.5  | 48             |
|   | Phase 2. Instrument 3, version B. Youth Self-Assessment Survey  | 350          | 1   | 0.17 | 59.5           |
|   | Phase 3. Instrument 3, version C. Youth Self-Assessment Survey  | 250          | 1.8 | 0.17 | 76.5           |
| <b>GenIC Respondents and Burden Hours:</b>  |   | <b>700</b>   |     |      | <b>220</b>     |
| <b>Total Respondents and Burden Hours:</b>  |   | <b>1,935</b> |     |      | <b>1,182.6</b> |

**Table 12.2: Burden Estimates for Future GenICs**

| <b>Instrument or Activity Type</b>                    | <b>No. of Respondents (total over request period)</b> | <b>No. of Responses per Respondent (total over request period)</b> | <b>Avg. Burden per Response (in hours)</b> | <b>Total Burden (in hours)</b> |
|---|---|--|--|--------------------------------|
| Interviews/Focus Groups/Cognitive Testing/Debriefings | 10,000  | 1.5  | 1.5  | 22,500                         |
| Questionnaires/Surveys                                | 6,500   | 1.5  | .5   | 4,875                          |
| Iterative Testing                                     | 1,500   | 5  | .75  | 5,625                          |
| Usability Tests                                       | 5,000   | 5  | .25  | 6,250                          |
| <b>Totals</b>   | <b>23,000</b>   |  |  | <b>39,250</b>                  |

*Estimated Annualized Cost to Respondents*

To calculate the annualized cost to respondents for the hour burden, we assume the majority of respondents will be from relatively low-income populations served by ACF. Some efforts are also likely to engage those who serve these individuals, and some may engage youth with no income. As such, the annualized cost is estimated based on the following:

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

- For low-income populations, we used the average household income of \$48,480, or 200 percent of the poverty threshold of \$24,240 for a family of three<sup>3</sup>. This figure translates to an hourly rate of \$24.04.
- For other respondents, we used the mean hourly wage for Community and Social Service Occupations, or \$28.36<sup>4</sup>. To account for overhead and fringe benefits, we multiplied this by two, which is \$56.72.
- For youth with no income, we have adjusted the estimates downward slightly.

Overall, the estimated average hourly wage as \$17.72. More accurate estimates will be provided for specific GenICs based on the population engaged.

**Table 12.2: Burden Request for New Generic Information Collections**

| Instrument or Activity Type                           | 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) | Average Hourly Wage Rate | Total Respondent Cost |
|---|--|---|-------------------------------------|-------------------------|--------------------------|-----------------------|
| Interviews/Focus Groups/Cognitive Testing/Debriefings | 10,000   | 1.5   | 1.5                                 | 22,500                  | \$17.72                  | \$398,700             |
| Questionnaires/Surveys                                | 6,500  | 1.5   | .5                                  | 4,875                   | \$17.72                  | \$86,385              |
| Iterative Testing                                     | 1,500  | 5   | .75                                 | 5,625                   | \$17.72                  | \$99,675              |
| Usability Tests                                       | 5,000  | 5   | .25                                 | 6,250                   | \$17.72                  | \$110,750             |
| <b>Totals</b>   | <b>23,000</b>                                  | <b>75,000</b>   |                                     | <b>39,250</b>           |                          | <b>\$695,510</b>      |

**Table 12.3: Burden Request for New and Ongoing Generic Information Collections**

| GenICs                          | No. of Respondents (total over request period) | No. of Responses per Respondent (total over request period) | Total Burden (in hours) |
|---------------------------------|--|---|-------------------------|
| Ongoing Information Collections | 1,935  | 3,380   | 1,183                   |
| Potential New GenICs            | 23,000   | 75,000  | 39,250                  |
| <b>Totals</b>                   | <b>24,935</b>                                  | <b>78,380</b>   | <b>40,433</b>           |

**A13. Costs**

One benefit of this generic mechanism is for ACF to actively engage the communities served through ACF-funded or similar programs to gather input on data collection materials and processes. Including these individuals with experience with ACF or similar programs in ACF research is in line with the following priorities of the current Administration and HHS:

<sup>3</sup> As estimated by the US Census Bureau in “Preliminary Estimate of Weighted Average Poverty Thresholds for 2023” <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-poverty-thresholds.html>

<sup>4</sup> Occupational Employment and Wages, May 2023 <https://www.bls.gov/oes/current/oes210000.htm>

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

- *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO 13985)*<sup>5</sup>
- *Presidential Memorandum on Restoring Trust in Government through Scientific Integrity and Evidence-Based Policy Making*<sup>6</sup>
- *ACF Evaluation Policy*<sup>7</sup>
- *Office of the Assistant Secretary for Planning and Evaluation's Methods and Emerging Strategies to Engage People with Lived Experience*<sup>8</sup>

Consistent with these guidance documents, and 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. Estimated Annualized Costs to the Federal Government**

Although we cannot anticipate the actual number of participants, length of responses, and/or mode of data collection for the surveys to be conducted under this clearance, we estimate cost to the Federal Government based on costs incurred on previously approved GenICs.

Based on previous costs, we estimate the annual costs to the Federal Government to be around \$400,000. Costs will be covered by the individual effort and office funds. These costs will be described in GenIC requests.

### **A15. Reasons for changes in burden**

This request is to renew the use of the ACF generic clearance for another three years with revisions to broaden scope. The overarching description and the burden estimates have been updated to reflect this change.

### **A16. Timeline**

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. ACF will develop individual timelines for projects involving generic clearances and inform OMB/OIRA when requesting expedited review due to these individual timelines.

---

<sup>5</sup> <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

<sup>6</sup> <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/27/memorandum-on-restoring-trust-in-government-through-scientific-integrity-and-evidence-based-policy-making/>

<sup>7</sup> <https://www.acf.hhs.gov/opre/report/acf-evaluation-policy>

<sup>8</sup> <https://aspe.hhs.gov/reports/lived-experience-brief>

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

**A17. Exceptions**

No exceptions are necessary for this information collection.