



November 26, 2024

Mary C. Jones
ACF/OPRE Certifying Officer
Department of Health and Human Services
Via email: infocollection@acf.hhs.gov

RE: Submission for OCS Review; DDDRP Beneficiary Enrollment Survey (OMB No. 0970-0531) (FR Doc 2024-22132)

Dear Ms. Jones:

Thank you for the opportunity to offer public comment in response to the updates and revisions proposed by the Office of Community Services (OCS) to the Beneficiary Enrollment Survey (BES) information collection procedure for the Diaper Distribution Demonstration and Research Pilot (DDDRP), as outlined in the Federal Register notice referenced above.

While the BES is a useful tool for gaining key data points that show the intersectional nature of systems of poverty, as is evident in the depth of the questions, we have concerns regarding the burden of this data collection on participant families and distribution partners, the accessibility of the data collection methods, and the sensitivity of the data being requested.

We offer the following feedback to the survey instruments which were provided.

1. Overall impact on agency and family time.

1. Family bandwidth: Most agencies have found that asking families to complete the BES, as it already is designed, on their own time results in non-response. To address this, Agency staff provide support to families when they can to fill out the BES on the spot. Even with agency staff support, completing the BES survey can be challenging due to language and translation needs, lack of understanding of the questions being asked, and varying literacy rates of participants all as examples, but not the only barriers, that contribute to difficulty quickly completing the BES. Lack of internet access also is a significant barrier for many families. While the estimated survey completion time is 5 minutes, families with multiple children in a region with poor internet connection can take upwards of 15-20 minutes to complete the survey.
2. Agency bandwidth: Some agencies are run by small teams, some are in rural areas, and some require speed and discreteness of delivery of diapers as one of the key draws of the program. In areas with limited access, agency staff collect information on paper and then enter it into Survey Monkey themselves. The inconsistency in agency capacity leads to an inconsistency in agency participation in the survey. This will result in skewed data where the data of participants from larger, more sophisticated

families will be collected on a regular basis and the data from participants of smaller programs or those programs whose participants need more support will be missing.

2. Sensitive nature of data – trust of data collection.

1. The questions being asked to determine diaper need collect sensitive data regarding times when a caregiver has been able to meet their caregiving duties. Being asked to recall and share that information can be very trying for many families. It can either be seen as a roadblock to receiving support and/or a potential method for gaining information to prove the caregiver is unable to care for their children. Even though the evaluators only receive the Diaper ID number, not all participants are comfortable with the understanding that this will not link them personally to their data. For families from traditionally marginalized communities (immigrants, LGBTQIA+, persons of color, etc.), the fear that this survey information will be used against them results in their unwillingness to participate. As mentioned previously, this results in incomplete data reflecting only subsets of the population.
2. Additionally, due to the sensitive nature of the data being collected, we recommend adding back in the “prefer not to answer” option for each question. This will allow families to opt out of questions where they are uncomfortable with responding.

3. The utility of the information gathered as returned to the agencies and families is unclear.

1. It is easier to encourage families to participate in data collection when programs can explain how sharing the data will benefit them and their peers. For most families this is most relatable at the local level. However, because data from the BES is not reported back to grantees in a comprehensive manner, this connection is difficult to make. Most programs end up collecting similar data through their own tools – thus duplicating data collection efforts. To make the BES and Outcome Survey more useful for grantees, it should be made clear how the data will be used and to determine a method within which the resulting data can be shared with grantees.

Recommendations to OCS to improve the survey to be more useful, clear and produce better quality data, we recommend the following:

1. Clearly express the use of data: OCS should articulate to the agencies how the data will be used and guarantee the provision of timely reporting on program changes which will be informed by the collected data.
2. Create a standardized approach for agencies to communicate the need for the survey to families. Families should be able to complete the survey and understand how each question informs the program’s trajectory. This will more clearly provide reason for the respondents’ time spent on survey completion and provide a guideline for how to grade data as quality. Providing guidelines for agencies to use uniformly and then tailoring them to each respective community would be exceptionally beneficial and reduce the administrative burden.
3. We would also recommend creating a video explanation and infographic, with translated versions into, at the very least, Spanish and Haitian Creole, to provide greater access to families. The families our agencies see have much linguistic and cultural diversity, so these two languages are not the only ones to consider but should be anticipated at the bare minimum.
4. Lastly, we would recommend allowing access to the survey data to agencies and our association to provide transparency as well as data validation. At the association level, we can interpret and provide instruction to the agencies, relieving some of the administrative burden on their organizations.



To minimize the burden of this data collection on respondents, we would recommend making it simpler and easier to get through quickly. This could be achieved by:

1. Testing to make the survey less than 3-5 minutes (and factoring in translation or other barriers to answering) and then sharing the survey results with DDDRP participants, requesting a small group of agencies, and providing additional compensation/incentives to provide an initial test of the updated version of the survey.
2. Creating a designated printed paper version - 1 page, double sided. This would resolve formatting challenges that come from printing directly from SurveyMonkey and would standardize the surveys. Right now, the agencies all use different approaches to the survey when printing, then must manually enter the data into SurveyMonkey.
3. We recommend making each data point in the survey optional by adding back in a “prefer not to answer” option. We also recommend making it very clear that any participation in the survey is optional and not a requirement of program participation.

We strongly believe that the DDDRP is an effective program for connecting families in need to a critical and often overlooked resource that is endemic to the economic conditions of our time, and we are thankful to OCS for the opportunity to partner on it.

Thank you for considering our feedback, suggested course of action, and the commitment to our mutual cause for a more just world.

Sincerely,



Georgia L. Del Freo
Chief Strategy Officer

