#### **Supporting Statement**

# **Request for Grantee Performance Measurement Data**

## A. Justification

1. Circumstances making the collection of information necessary

The information to be collected is information on the performance (outputs and outcomes) of Healthy Marriage Promotion and Responsible Fatherhood grant programs funded by the Office of Family Assistance (OFA). These grants were authorized under Sec.7103 Grants for Healthy Marriage Promotion and Responsible Fatherhood of the Deficit Reduction Act of 2005, Pub. L. No. 109-171, 120 Stat. 4 (Feb. 8, 2006). A copy of the legislative authority is included as Attachment A.

The information collection is necessary for OFA and the Administration for Children and Families (ACF) to ensure the accountability and performance of these grants programs. The grant solicitations issued by the Administration for Children and Families require the grantees to participate in data collection. Specifically, the grant announcements state, "[a]ll grantees will participate fully in quantitative or monitoring activities that capture measurable indicators and outcomes. ACF will require a consistent measuring system across all funded programs."

The Healthy Marriage grant announcement and the Deficit Reduction Act funds grantees in several priority areas to conduct one or more of the following activities:

- Public advertising campaigns on the value of marriage and the skills needed to increase marital stability and health.
- Education in high schools on the value of marriage, relationship skills, and budgeting.
- Marriage education, marriage skills, and relationship skills programs, that may include parenting skills, financial management, and job and career advancement, for nonmarried, pregnant women and nonmarried, expectant fathers.
- Premarital education and marriage skills training for engaged couples and for couples or individuals interested in marriage.
- Marriage enhancement and marriage skills training programs for married couples.
- Divorce reduction programs that teach relationship skills.
- Marriage mentoring programs that use married couples as role models and mentors in at-risk communities.
- Programs to reduce the disincentives to marriage in means-tested aid programs, if offered in conjunction with any activity described above.

The Promoting Responsible Fatherhood grant announcement and the Deficit Reduction Act funds grantees in several priority areas to conduct one or more of the following activities:

- Activities to promote marriage or sustain marriage
- Activities to promote responsible parenting
- Activities to foster economic stability by helping fathers improve their economic status

### 2. Purpose and use of information collection

The purpose of the information collection is to allow OFA and ACF to carry out their responsibilities for program accountability under the Government Performance and Results Act (GPRA), the President's Management Agenda (PMA) and Program Assessment Rating Tool (PART) reporting. The GPRA requires Federal agencies to develop goals and objectives, measure their performance, and communicate information about their performance to Congress and the public. Under the PART, OMB and Federal agencies assess and improve the agencies' program performance to achieve better results. The PART reinforces the results-oriented performance measurement framework developed under the GPRA.

The collected information will be used by OFA to assist Federal Project Officers (FPOs) to monitor and manage the performance of grantees on the outputs and the short- and intermediate-term outcomes of the grant program. The data will also be aggregated to assess the overall performance of the grant program, respond to any request for PART review, and support management and budget decisions regarding the grant program.

### 3. Use of improved information technology and burden reduction

Grantees will report the data twice yearly using the ACF's Online Data Collection (OLDC). Online Data Collection will reduce grantees' reporting burden by providing a convenient and simple method for submitting data electronically. Grantees will only be able to view and report on the allowable activities which they are funded to conduct, reducing the burden for grantees of determining what forms to complete. The questions are broad enough to allow grantees to report on the data requested, despite the extensive variety of activities being conducted by the grantees. Grantees are expected to report data for activities they conduct and collect data on. Hard copies of the data forms, date entry instructions, and glossaries being incorporated into OLDC for the information collection are included in Attachments B-F.

#### 4. Efforts to identify duplication and use of similar information

We examined several potential data sources, both internal and external to the grant program and found none of the data sources to be suitable for providing OFA with performance metrics on the grant program.

Grantees are currently providing some information on program activities in their semiannual reports to OFA. However, the information collected for the performance measurements will obtain information on program performance that is not provided in the semi-annual reports. Specifically, this information request will provide data about the discrete number of people served/participating and the positive changes experienced by individuals attributed to program participation.

We also considered that grantees are conducting individual evaluations of their programs. The methods and instruments grantees are designing to gather data for evaluation purposes are tailored to each program and the methodology and outcome measures vary greatly across grantees. The performance measures were developed to create a consistent set of measures that can be aggregated up to the program level and be broad enough to apply to the variety of activities grantees are conducting. Grantees can use information collected for their evaluations, but the performance measures will not duplicate existing evaluation efforts. Grantees will be encouraged to include the performance measures in their local evaluations.

In addition to the individual grantee's evaluations, there are three HHS-sponsored national level evaluations of Healthy Marriage program models being conducted<sup>1</sup>. There is little overlap between grantees participating in any of the national evaluations and those being funded through the Healthy Marriage and Responsible Fatherhood grant programs. The national level evaluations are narrowly focused on specific program models and cannot be used to monitor and determine the performance of these OFA grantees. Collecting performance data from the Healthy Marriage and Promoting Responsible Fatherhood grantees will complement and contribute to knowledge in the field about Healthy Marriage and Responsible Fatherhood programs and will not duplicate information.

We also considered State or national level data on marriage and divorce rates as benchmark performance measures to reflect the intermediate-term goals of the grant program of increasing healthy marriages and decreasing divorce rates, on the way to the long-term goal of increasing family and child well-being. However, due to the small geographic regions that the grants operate in and the multitude of other factors that can affect marriage and divorce rates, these measures were deemed inappropriate benchmarks. Collecting data from grantees is the most reasonable and appropriate way to determine program performance.

#### 5. Impact on small businesses or other small entities

<sup>1</sup> The three evaluations are the Building Strong Families (BSF) project sponsored by the Administration of Children and Families' Office of Planning, Research and Evaluation (OPRE) and conducted by Mathematica Policy Research, Inc., the Community Healthy Marriage Initiative (CHMI), funded through waivers granted by the Office of Child Support Enforcement (OCSE) under authority of Section 1115 of the Social Security Act and the Supporting Healthy Marriages (SHM) evaluation funded by the Office of Planning, Research and Evaluation (OPRE/ACF/HHS) and being conducted by MDRC.

Information being requested has been held to the minimum information necessary to construct performance measures for the Healthy Marriage and Responsible Fatherhood grants. It is anticipated that these requirements will have no impact on small businesses or other entities. The grantees submit all of their reports to OFA electronically, therefore they will not be required to purchase computers or incur other capital costs for providing the required information using the ACF's OLDC. The time required for the average entity to respond is estimated at 1.6 hours per year. This amount of time should not impose substantial burdens on these entities.

6. Consequences of collecting the information less frequently

Grantees are required to provide information semi-annually. This frequency of reporting is needed to obtain information needed for timely grant monitoring and assessment of the development of the grant programs.

7. Special circumstances relating to the guidelines of 5 CFR 1320.5

None. The information collection does not involve any special circumstances relating to the guidelines of 5 CFR 1320.5.

8. Comments in response to the Federal Register notice and efforts to consult outside the agency

One comment was received in response to the Federal Register Notice published on August 25, 2008 (pages 50021 and 50023). The individual requested "a copy of the proposed information collection." OFA will provide a copy when it is submitted to OMB as part of the request package.

Early in the process of developing performance measures, OFA consulted with small groups of Healthy Marriage and Responsible Fatherhood grantees (<10) on the potential measures being developed and the proposed data collection techniques. Grantee input was considered and in some cases, modifications were made based on grantee comments. During the final stages, OFA again requested consultation from 9 Healthy Marriage and 9 Responsible Fatherhood grantees about the proposed performance measures and the feasibility of collecting the proposed information. Responses were received from six of each type of grantee. The pilot version of the reporting form, the instructions, and glossary were sent as Word documents via email along with a comment sheet soliciting feedback on the feasibility of reporting the data, the time involved, and the clarity of the instructions and questions. A copy of the comment form is included in Attachment G.

OFA also consulted with Mr. Seth Chamberlain (202-260-2242) with the Office of Planning, Research and Evaluation regarding his knowledge of the requirements for the performance measurement section of the PART review and of the 3 national evaluations of similar healthy marriage initiatives. He confirmed that standard measures do not yet exist in the healthy marriage field.

OFA has consulted with Dr. Matthew Shepherd with James Bell Associates (703-247-2637). Dr. Shepherd provided input on the proposed performance measures, method of data collection, and feasibility of grantees providing the data. James Bell Associates provides the Healthy Marriage and Responsible Fatherhood grantees with evaluation technical assistance.

### 9. Explanation of any payment or gift to respondents

None. There are no gifts or payments for respondents.

## 10. Assurance of confidentiality provided to respondents

Respondents are grantees; they are reporting on grant outputs and outcomes during the reporting period. Information on the performance of individual grantees will be used by FPOs in monitoring and managing the grants. Grantee information will be aggregated to the program level (or other intermediate level, such as program grantees working in particular grant areas) to provide information on the performance of the grant program.

Respondents are told that the information they provide will be available to their FPO and to OFA, and that for public reporting, the information will be presented in aggregate form rather than for individual grantees.

## 11. Justification for sensitive questions

No sensitive questions are asked. Grantees are only asked to provide information on changes in participants' knowledge and skills for marriage and parenting (e.g., conflict resolution, communication), attitudes about the importance of marriage and fatherhood, or similar changes.

#### 12. Estimates of annualized burden hours and costs

Data will be collected from all 118 Healthy Marriage and 96 Responsible Fatherhood grantees in the OFA program. Based on feedback from 6 Healthy Marriage and 6 Responsible Fatherhood grantees who have piloted the reporting form, we estimate it will take on average approximately 1.6 hours per year per grantee to respond to this information request. Based on an estimated average hourly salary of \$40 per hour (including fringe benefits, overhead, etc), the total annual cost for the 214 grantees is estimated to be \$13,696. The Information Collection Request has been divided into two information collections because grantees are both private entities and State, local and tribal governments. There are approximately 190 private entities grantees resulting in 304 burden hours for these respondents at a cost of \$12,160. The remaining 24 grantees are State, local, or tribal governments that will incur 38.4 annual burden hours at a cost of \$1,536.

The following table shows the burden estimate.

### Annual Burden Estimates

Instrument	Number of respondents	Number of responses per respondent	Average burden hours per response	Total annual burden hours
Performance measure reporting form (for private sector affected public)	190	2	0.8	304
Performance measure reporting form (for State, local, and tribal government affected public)	24	2	0.8	38.4
Estimated Total Annual Burden Hours				342

## 13. Estimates of other total annual cost burden to respondents and record keepers

For this information collection the respondents will not have to invest in any new technologies or data collection resources for the purpose of producing and providing this information. Therefore, no additional cost burden applies.

### 14. Annualized cost to the federal government

We estimate total annual Federal burden to be 223 hours for an estimated annual cost of \$19,409

	Development		Travel		Monitoring		
		Avg.				Avg.	Total
	Hours	Salary	Trips	Cost	Hours	Salary	Cost
Total - All							
Federal							
staff	130	83	6	600	762	83	77,636
						Average	
						Annual	
						Cost	19,409

Note: Federal burden estimate includes costs for development and monitoring for years 2 though 5 of the grants. Average salary is calculated as a weighted average of the loaded

hourly rates of GS-15 Step 2 managers and GS-12 Step 2 Federal Project Officers. Travel costs are estimated for 2 Federal Staff to travel to three on-site data collection trainings for grantees.

15. Explanation of program changes or adjustments

This is a new program.

16. Plans for tabulations and publication and project time schedule

Performance measurement data will be tabulated (descriptive statistics such as frequencies and percentages) twice a year. The information will be used by FPOs to provide feedback to and monitor the performance of individual grantees. The aggregate data will be used by OFA for program monitoring and management and to create efficiency measures for the grant program. Aggregate data can also be used to respond to any request for PART review or other Federal program accountability request. Aggregate data may also be used as part of a Congressional report or briefing or other products to report on the Healthy Marriage Promotion and Responsible Fatherhood grant programs.

## **Project Time Frame**

Grantees are in year three of a five year grant program. OFA will collect data on a semiannual basis for years 3 through 5 and any additional years of funding the grant program receives. The following table maps out the timeline for the first round of data collection and analysis.

Activity	Approximate Time Frame
Training sessions on reporting	2-7 weeks post OMB approval
First round of data reporting	7-10 weeks post OMB approval
Data approvals	10 weeks plus 10 days post OMB approval
Data analysis preliminary	16 weeks plus 10 days post OMB approval
Data analysis final and report	22 weeks plus 10 days post OMB approval

17. Reason(s) display of OMB expiration date is inappropriate

Not applicable. OMB expiration date will be displayed.

18. Exceptions to certification for Paperwork Reduction Act Submission

None. No exceptions to certification.

## B. Collection of Information Employing Statistical Methods

Data will be reported by all grantees thus no statistical sampling or other statistical methods will be used.