ATTACHMENT B:

JUSTIFICATION FOR EMERGENCY CLEARANCE

MEMORANDUM

To: Marissa Gordon-Nguyen, OMB/OIRA

From: Seth Chamberlain, HHS/ACF/Office of Planning, Research, and Evaluation

Subject: Justification for Requesting Emergency Clearance for Site-Specific Variants of the Evaluation of Adolescent Pregnancy Prevention Approaches (PPA) Baseline Instrument (OMB Control No. 0970-0360)

Date: April 19, 2011

This memo provides background information about the Evaluation of Adolescent Pregnancy Prevention Approaches (PPA) and outlines our justification for requesting emergency review for site-specific variants for the OMB-approved PPA baseline instrument. We request emergency review and approval of the instruments within one month after they have been submitted to OMB, which should be in June 2011. We would also initiate a full clearance request process at that time, to ensure that the process can be completed by the time emergency approval expires, six months after the request for approval is submitted.

1. Background

PPA. The Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS) is overseeing, through funding by HHS' Office of Adolescent Health (OAH), the Evaluation of Adolescent Pregnancy Prevention Approaches (PPA), an eight-year demonstration designed to study the effectiveness of promising policy-relevant strategies to reduce teen pregnancy.

Baseline data collection approval, and current PPA sites. Approval for the baseline survey data collection and the collection of youth participant records was received on July 26, 2010 (OMB Control No. 0970-0360), when PPA site recruitment was just beginning. Upon approval, OMB requested update reports when sites were brought into the evaluation. The first such report was provided on the Chicago site; that site used the OMB-approved baseline questionnaire. Additional PPA sites are being recruited, but have not yet begun participation in the evaluation. Besides Chicago, another prospective site has signed an agreement, and would, under current plans, enroll samples and conduct BL data collection in fall 2011. Meanwhile, intensive discussions are under way with seven organizations that have Teen Pregnancy Prevention (TPP) or Personal Responsibility Education Innovative Strategies (PREIS) grants, and that could be folded into the PPA evaluation.

TPP and PREIS grant programs, and grantee evaluations. The TPP and PREIS programs are key parts of the President's Teen Pregnancy Prevention Initiative, and evaluation of these programs are expected to lead to confirmation of the effectiveness of existing evidence-based programs, and discovery of new effective programming. A subset of grantees applied to implement new, innovative programs, or replications of existing evidence-based programs with major adaptations. This subset is sometimes, in shorthand, referred to as "Tier II" (Tier I are

those grantees replicating evidence-based programs with fidelity). All of these Tier II grantees were required, as part of their grant applications, to propose plans to conduct their own "local" evaluations, which would be rigorous (RCT or high-quality QED). Thus, as part of their grant application, these grantees had to propose activities in which more participants were recruited than could be served, so that program and control groups could be created.

Although all of this subset of grantees was required to propose plans to conduct their own "local" evaluations, they were also required, if selected, to participate in one of several Federal evaluation studies currently being planned or implemented that examine the impact of teen pregnancy prevention programs. One of these evaluations is PPA. PPA is focusing its evaluation sites on those grantees that are implementing Tier II-type programs, i.e. new, innovative programs and replications of existing evidence-based programs with major adaptations. PPA is now in conversations with seven of these Tier II-type programs.

Enrollment of participants in fall 2011. The enrollment of participants in the programs and the enrollment of sample in the evaluation (whether that evaluation is "local" or part of PPA) are in and the same. Most of these grantees, under the conditions of their grants, would begin to enroll participants – and thus evaluation sample – in fall 2011. **This fall 2011 enrollment is critical for these evaluation sites due to sample size: if sample is not collected in fall 2011, the grantees will not enroll enough sample over subsequent years to have sufficient sample size to have enough power to detect impacts.** Regardless of whether the grantee carries out a local evaluation or is selected to be part of the PPA evaluation, the grantee still intends to recruit a sufficient number of participants to create programs and control groups – and this will mean recruitment in fall 2011. Grantees do not need OMB clearance for data collection activities that are not directed by a government agency; however, since PPA is a government contract, if a grantee is selected to be part of PPA, the grantee and PPA will need to get OMB clearance on the baseline data collection instrument.

Collaboration between PPA contractor and grantee on baseline data collection instrument. If a "Tier II" grantee is selected for a federal evaluation (e.g. PPA), the local and federal evaluators will collaborate to carry out evaluation activities, including the development of suitable site-specific data collection instruments. The collaboration between the grantees and PPA will be mutually beneficial. Most survey items used will be the same across evaluation sites, thus enabling cross-site comparison and consistent interpretation of important measures. However, survey questions important to analysis of each site's program impacts may vary depending on the population served or the nature of the program. For example, in sites with programs for foster care youth, or for pregnant and parenting youth, some questions in the approved baseline instrument would be inappropriate, and some additional questions pertinent to the population or the specific outcomes the program seeks to affect might be needed. Such additions and deletions need to be integrated into the site-specific version of the data collection instrument to make it most effective.

Timeline. At this point, we are discussing baseline data collection instruments with grantees, but we do not expect to have agreement on site-specific baseline data collection instruments until June, 2011.

2. Problem: Timeline

As we begin collaborating with the sites, we are unlikely to have time to:

a. reach agreement with federally-funded TPP or PREP grantees on questions that should be asked at baseline;

b. publish 60- and 30-Day FRNs; and

c. receive OMB approval

in time for baseline instruments to be administered on schedule beginning in September 2011. The normal clearance process would thus prevent information collection and evaluation sample enrollment for the first, and critical, program cohorts. In most cases, grantees would not be able to "make up" for that loss of sample within the period of their grant. As a result, the evaluation would be seriously degraded: most sites would not have enough sample to have sufficient power to detect impact. We would risk <u>not</u> finding impacts and erroneously concluding, because sample is too small, that programs associated with the President's Teen Pregnancy Prevention Initiative are not effective.

3. Justification for Requesting Emergency Clearance

The regulations for implementing the Paperwork Reduction Act specify the requirements for requesting emergency processing:

§ 1320.13 Emergency processing:

An agency head or the Senior Official, or their designee, may request OMB to authorize emergency processing of submissions of collections of information.

(a) Any such request shall be accompanied by a written determination that:
(1) The collection of information:
(i) Is needed prior to the expiration of time periods established under this Part; and
(ii) Is essential to the mission of the agency; and

(2) The agency cannot reasonably comply with the normal clearance procedures under this part because:
(i) Public harm is reasonably likely to result if normal clearance procedures are followed; or
(ii) An unanticipated event has occurred; or
(iii) The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court ordered deadline to be missed.

(b) The agency shall state the time period within which OMB should approve or disapprove the collection of information.

(c) The agency shall submit information indicating that it has taken all practicable steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information.

(d) The agency shall set forth in the **Federal Register** notice prescribed by § 1320.5(a)(1)(iv), unless waived or modified under this section, a statement that it is requesting emergency processing, and the time period stated under paragraph (b) of this section.

(e) OMB shall approve or disapprove each such submission within the time period stated under paragraph (b) of this section, provided that such time period is consistent with the purposes of this Act.

(f) If OMB approves the collection of information, it shall assign a control number valid for a maximum of 90 days after receipt of the agency submission.

Emergency review for the site-specific variants of the PPA baseline instrument appears justified because the collection of the information is essential to the agency and the use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information.

We request emergency review and approval of the instruments within one month after they have been submitted to OMB, which should be in June 2011. We would also initiate a full clearance request process at that time, to ensure that the process can be completed by the time emergency approval expires, six months after the request for approval is submitted.