

Formative Data Collection (OMB Number 0970-0356)

Supporting Statement Part A for OMB Approval

ACF Youth Demonstration Development Project

January 2012

Updated April 2012

A. JUSTIFICATION

The Office of Planning, Research and Evaluation (OPRE) at the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), requests permission to conduct semi-structured discussions with practitioners working in youth-serving programs. This activity is planned as part of ACF's Youth Demonstration Development (YDD) project, which is developing a conceptual framework for program models that can be implemented and evaluated in a potential future demonstration evaluation. This is the only information collection associated with this project.

The information collected will be used to refine the draft conceptual framework and fine-tune recommendations for future evaluation. The framework currently includes a focus on developing the self-sufficiency and resilience of at-risk youth, by integrating both of these elements and by conducting a comprehensive assessment of their needs. The discussions for which we seek clearance will be conducted with staff at programs already incorporating at least some elements of the draft framework into their programs, to assess feasibility of the approach.

Permission to collect information for this limited purpose is requested under ACF's generic clearance for Formative Data Collection for Informing Policy Research (OMB Number 0970-0356). The information collected will be used for internal purposes only and will not be released to the public.

1. Circumstances Making the Collection of Information Necessary

The YDD project team developed the draft conceptual framework based on research and guidance from the project's technical working group. Although these resources are crucial to the development of such a framework, it is important to examine whether implementation of programs based on the framework is feasible and makes sense from the perspective of youth program providers. Practitioners and program managers can provide information on the challenges they have experienced implementing specific elements of the framework, how they have addressed them, and provide opinion on what practical considerations would be necessary to implement a model that includes all elements of the framework.

2. Purpose and Use of the Information Collection

We plan to visit programs serving at-risk youth to hold discussions with administrators and front-line staff focused on their reactions to the framework and their experiences working with at risk youth. These discussions will help OPRE identify any needed modifications to the draft conceptual framework, and potentially help shape future program and research efforts.

To refine the YDD conceptual framework, it will be important to engage practitioners at programs implementing at least some of the key elements of the draft conceptual framework (as identified in the research literature and by experts) to determine if it represents a feasible program approach. We will focus on organizations implementing programs designed to build resilience and human capital. OPRE will select organizations/programs for field visits through two primary mechanisms: (1) referral by experts (the project's technical working group), and (2) a review of existing research literature and organization/program websites. Programs recommended by members of the technical work group will be given the most consideration. Additionally, programs highlighted by ACF program offices such as the Office of Child Support Enforcement will be examined. Field visits will be conducted by a two-person research team.

Appendix A presents the *Youth Development Demonstration Discussion Guide* which will guide the semi-structured conversations.

3. Use of Improved Technology and Burden Reduction

The semi-structured discussions will require sharing and discussing the draft framework with program staff; due to the nature of the interviews and the small sample sizes, it is not appropriate to use information technology such as computerized interviewing.

To minimize burden, we will hold semi-structured group discussions, rather than individual conversations, whenever possible. Each group discussion will include staff at the same or similar level within the organization. For example, one group discussion may be held with multiple front-line workers, such as case workers or outreach specialists. A separate group discussion may be held with supervisors of the front-line staff. A third discussion group may include staff at the management or administrative level, such as the program manager or executive director. If a program has only a single staff member in a particular level, however, an individual discussion will be held. We anticipate that staff at each of these levels will have different perspectives and thus may have different reactions to our proposed framework. Group discussions will allow us to reduce the length of time spent at the program while still obtaining valuable feedback on our conceptual framework from staff with a range of experiences.

4. Efforts to Identify Duplication and Use of Similar Information

Because this information collection is designed to gather feedback specific to the conceptual framework being refined, no other information could serve as an adequate substitute. Publicly available documents, as well as documents provided by the organizations, will be reviewed by the team to help guide the discussions and potentially shorten them by enabling information to be filled in pre- or post-discussion.

5. Impact on Small Businesses or Other Small Entities

It is possible that some of the organizations selected for fieldwork will be small; however, we expect the impact on these programs to be limited. The field visit and interviews will be scheduled in collaboration with the program staff to minimize disruption on daily activities. The field visit team will conduct group discussions to the extent that it is feasible to do so. An individual discussion may be necessary if the program does not have more than one staff at a particular level in the organization (e.g., a single supervisor of front-line staff would have an individual interview rather than be a member of the front-line staff group interview or a member of an interview with staff who supervise them).

6. Consequences of Collecting the Information Less Frequently

This is a one-time collection effort.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances requiring deviation from these guidelines.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The first Federal Register notice for ACF's generic clearance for information gathering was published in the Federal Register, Volume 76, page 34078 on June 10, 2011.

The second Federal Register notice was published in the Federal Register, Volume 76, page 53682 on August 29, 2011.

9. Explanation of Any Payment or Gift to Respondents

No payments to respondents are proposed for this information collection.

10. Assurance of Privacy Provided to Respondents

Participants will be told that their conversations will not be shared with anyone outside the research team or federal staff and will not be publicly released in a form that identifies them.

11. Justification for Sensitive Questions

There are no sensitive questions.

12. Estimates of Annualized Burden Hours and Costs

The proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses other than the time spent in conversation with ACF.

The estimated annual burden is listed in Table A.1. The total annual burden for this information gathering activity is expected to be 42 hours.

Respondents may include administrative staff from local or private, non-profit programs, direct service staff, organizational partners, and funders. Field visits will be conducted to six organizations. The specific number of respondents may vary by organization depending on the number of staff who have administrative or direct service duties and the number of organizational partners. However, there will be no more than 7 interviews in each site, for a total of 42 interviews. This may include interviews with staff at the organization and its partners. To minimize burden, discussions will be held in a group format whenever possible, with staff at the same level in each discussion.

To compute the total estimated annual cost, the total burden hours were multiplied by \$33.90, the mean hourly earnings for management, professional and related workers in the civilian workforce as reported by BLS NCS (2010).¹ The total estimated annual cost is \$1,627.20.

However, there will be no more than 7 interviews in each site, for a total of 42 interviews. This includes interviews with up to 4 staff at the organization and up to 3 partners a. The specific nature of the discussions, whether they will be an individual or group format, will be determined by the program and its organizational structure.

¹ U. S. Department of Labor, Bureau of Labor Statistics "National Compensation Survey: Table 1: Summary Mean hourly earnings and weekly hours for selected workers and establishment characteristics." 2010. <http://www.bls.gov/ncs/ocs/sp/nctb1344.pdf>.

Table A.1. Estimated Annual Response Burden and Annual Cost

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Semi-structured interview with staff, partners, and funders	42	1	1	42	\$33.90	\$1,423.80
Conference call for purpose of recruiting sites	12	1	.5	6	\$33.90	\$203.40
Total	54	1	.75	48		\$1,627.20

13. Estimates of Other Total Annual Cost Burden to Respondents and

Record Keepers

The information collection does not place any other cost burden on respondents.

14. Annualized Cost to Federal Government

The annual cost to the federal government for this data collection and analysis will be approximately \$190,000. This is also the total cost because this is a one-time collection that will take place in a single year.

15. Explanations for Program Changes or Adjustments

This is a new project.

16. Plans for Tabulation and Publication and Project Time Schedule

All discussions with staff of local programs will occur between April 15, 2012 and July 15, 2012, assuming clearance is received by April 9, 2012. Notes will be taken during each discussion and a brief summary of each discussion will be written for internal purposes. This information will not be published. It will be used internally for refinement of a conceptual framework and for research planning purposes. The project will conclude by December 2012, with the final conceptual framework and recommendations for future research.

17. Display of Expiration Date for OMB Approval

The OMB number and expiration date will be displayed at the top of any handouts given in conjunction with the discussions (see Appendix B for materials to be shared with respondents including materials used in the recruitment process as well as the data collection process). We will offer to read the OMB number and expiration date at the start of any conversation.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.