

DEPARTMENT OF HEALTH AND HUMAN SERVICES

Secretary

Office of the

Assistant Secretary for Health Office of the Assistant Secretary for Health Washington, DC 20201

TO: Brenda Aguilar and Jennifer Park, OMB

FROM: Amy Feldman Farb, Office of Adolescent Health
CC: Evelyn Kappeler, Office of Adolescent Health;
Marc Clark, Family Youth Services Bureau, ACYF

DATE: October 17, 2012

SUBJECT: Non-Substantive Change Request to 0990-0392

On October 18, 2011 OMB approved The Office of Adolescent Health/ACYF's TPP Program performance measures information collections package (0990-0392). Part of this data collection proposal included measures we called "Perceived Impact of the Program". These questions included:

Perceived Impact of Program

For the next few questions, please think about [NAME OF PROGRAM] and how it may have influenced you. You may not have thought about these situations before, but please still answer the questions. Think about what you would do and answer as best you can.

- 1. Would you say that being in (NAME OF PROGRAM) has made you more likely or less likely to have sexual intercourse in the next year?
- 2. If you were to have sexual intercourse in the next year, would you say that being in (NAME OF PROGRAM) has made you more likely or less likely to use (or ask your partner to use) any of these methods of birth control?
- 3. If you were to have sexual intercourse in the next year, would you say that being in (NAME OF PROGRAM) has made you more likely or less likely to use (or ask your partner to use) a <u>condom</u>?
- 4. Would you say that being in (NAME OF PROGRAM) has made you more likely or less likely to abstain from sexual intercourse in the next year (abstaining means choosing not to have sex)?

The intent of collecting these measures was to have some outcome-like data on our Tier 1 A/B grants as part of our performance measures. These grants are funded to replicate evidence-based programs, not evaluate them, and therefore have no associated rigorous evaluation component. OAH did not have time to formally pilot test these measures prior to our information collections request.

At this time we have collected and analyzed the first round of data and we note some concerns, in particular on the perception questions. The data show that approximately 16% of the participants answered the sex and abstinence questions in the same way, when they should have produced opposite responses if the questions were being answered reliably. At this time, we've been unable to isolate the source of this noise.

Because we know collecting this data is burdensome to the participants and the benefit to the collection of the information is now lower, OAH plans to halt collection of the perception questions. The perception measures are not primary to the research questions we are going to answer with these TPP grants. The A/B grants are replication grants and therefore the most important data to collect from them are program monitoring and program fidelity measures, not impact data (which we do not get with the perceived impact questions either). The Tier 1 C/D and Tier 2/PREIS have evaluation components to

their grant and will be reporting on the rigorous participant-level measures as approved in our collections package.

OAH consulted with ACYF to let them know about our decision to discontinue collection of this Page 2- Non-Substantive Change Request to 0990-0392

information for our TPP grantees. ACYF has indicated that they will likely retain this data collection for their 12 projects. Therefore, we're asking for a non-substantive change and change in burden from 50,654 respondents to 5,770 respondents and 7,197 total burden hours to 3,428 total burden hours, which retains only ACYF's burden associated with the perception questions.

Table 1: Summary of TPP and PREIS grants

	Agency	Description	Independen t rigorous evaluation	# of grants
TPP grants				
Tier 1 A/B	ОАН	Replication grants funded at <\$1 million/year, no evaluation	No	59
Tier 1 C/D	ОАН	Replication grants funded at >\$1 million/year	Yes	16
Tier 2	ОАН	Research and demonstration grants	Yes	19
PREIS grants	ACYF	Research and demonstration grants	Yes	12
TOTAL				106

Table 2. Approved Estimated Annualized Burden Hours

Forms (If necessary)	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Perceived impact questions	Youth participating in programs	50,547	1	5/60	4,212
Reporting form for reach	Grantee program staff	107	2	4	856
Tier 1 A/B performance measure reporting form	Grantee program staff—Tier 1 A/B	59 ¹	1	19	1121
Tier 1 C/D and Tier 2/PREIS performance measure reporting form	Grantee program staff—Tier 1 C/D and Tier 2/PREIS	48²	1	21	1008
Total		50,654			7,197

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There were originally 13 PREIS grantees but one was not able to implement, resulting in 12 grantees. The revised burden in Table 3 reflects removal of the perceived impact questions for OAH grantees and leaves the burden associated with collection of these data for PREIS grantees (minus the one terminated). Table 3 also removes the burden associated with the 1 terminated PREIS grantee. All burden changes are highlighted in yellow.

¹ These respondents are already represented in the 107 respondents in the line above

² These respondents are already represented in the 107 respondents 2 lines above

Table 3. Revised Estimated Annualized Burden Hours

Forms (If necessary)	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Response	Total Burden Hours
Perceived impact questions	Youth participating in programs	<mark>5,664</mark>	1	5/60	<mark>472</mark>
Reporting form for reach	Grantee program staff	<mark>106</mark>	2	4	848
Tier 1 A/B performance measure reporting form	Grantee program staff—Tier 1 A/B	59³	1	19	1121
Tier 1 C/D and Tier 2/PREIS performance measure reporting form	Grantee program staff—Tier 1 C/D and Tier 2/PREIS	<mark>47</mark> 4	1	21	<mark>987</mark>
Total		<mark>5,770</mark>			3,428

³ These respondents are already represented in the 106 respondents in the line above 4 These respondents are already represented in the 106 respondents 2 lines above