Supporting Statement for the
Office of Adolescent Health
Annual Pregnancy Assistance Fund (PAF) Performance
Data Collection

Submitted to

Office of Management and Budget
Office of Information and Regulatory Affairs

Submitted by

Department of Health and Human Services
Office of the Assistant Secretary for Health
Office of Adolescent Health

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A. Justification

1. Circumstances Making the Collection of Information Necessary

This is a request for the Office of Management and Budget (OMB) approval for a new annual collection of performance data from grantees of the Pregnancy Assistance Fund (PAF). The PAF is a competitive grant program authorized by the Affordable Care Act (ACA) (Public Law 111-148) and administered by the Office of Adolescent Health (OAH). The Act appropriates $25 million for each of fiscal years 2010 through 2019. The performance measure collection is important to OAH because it will provide the agency with data to both effectively manage the PAF program, and to comply with accountability and federal performance requirements for the 1993 Government Performance and Results Act (P.L. 103-62). Moreover, collecting and reporting on data for performance measures are a funding requirement for the grants, as stated in the funding opportunity announcement.

PAF provides funding to States and Tribes to provide expectant and parenting teens, women, and fathers with a seamless network of supportive services to help them complete high school or postsecondary degrees and gain access to health care, child care, family housing, and other critical supports. Grantees may use PAF grants to carry out activities in any of the following four implementation categories: (1) Support pregnant and parenting student services at institutions of higher education (IHE); (2) Support pregnant and parenting teens at high schools and community service centers; (3) Improve services for pregnant women who are victims of domestic violence, sexual violence, sexual assault, and stalking; and (4) Increase public awareness and education efforts about services available to pregnant and parenting teens and women. In September 2010, OAH awarded the first 3–year grants to 17 entities ("first cohort"). OAH allowed each grantee in the first PAF cohort to identify and report data, using the Annual Progress Report, for performance measures that they had defined. OAH compiled the diverse and grantee-specific measures and used them to establish and refine a minimum set of required performance measures for all grantees, as well as for all grantees within each implementation category. In July 2013, OAH awarded 4-year grants to 17 entities ("second cohort"). This request for OMB approval is for collection of data for the minimum set of required PAF performance measures for the second cohort of PAF grantees.

Attachment A to this statement contains a copy of the authorizing legislation that supports the collection of PAF performance data. **Attachment B** is a copy of the required and optional performance measures. **Attachment C** is a copy of the *60–day Federal Register Notice.*

2. <u>Purpose and Use of Information Collection</u>

Collection of annual performance data will benefit grantees by assisting PAF administrators with ongoing program monitoring and continuous quality improvement of their individual projects. The collection of annual performance data will assist OAH in gathering uniform demographic information on all funded grantees, assessing progress across all PAF projects and providing timely technical assistance to grantees, as necessary. OAH will use the performance data to inform planning and resource allocation decisions; identify training, technical assistance, and evaluation needs; and provide Congress, OMB, and the general public with information about the individuals who participate in PAF-funded activities and the range and scope of services they receive. **Exhibit 1** summarizes the performance data required of all grantees, and from each grantee according to the types of activities they are implementing ("implementation category").

The performance data required of all grantees will enable OAH to (1) describe the social and demographic characteristics (e.g., age, race, ethnicity, English proficiency, relationship and co-parenting status) of individuals who receive PAF-funded services ("participants"); (2) summarize participants' use of health care or support services (e.g., education, child care, parenting skills development, transportation) received directly from program staff or through referral; (3) describe the number of new and ongoing staff that receive initial and refresher training; and (4) describe the number of formal and informal organizational partners that participate in program implementation and the number of formal partners that remain engaged in program implementation during the entire program year. Performance data specific to each implementation category will provide information for such expected outputs and outcomes as high school graduation or GED completion; continued enrollment in or graduation from an IHE; provision of supportive social, accompaniment, or intervention services to pregnant women who are victims of violence; and the number and types of public awareness campaigns.

Together, the collection of PAF performance data will allow OAH to answer a range of questions about PAF participants, project outputs, and project outcomes, including:

- What are the characteristics of individuals who participate in PAF-funded activities?

- What types of services (e.g., health care, education support, parenting, or other support) do PAF participants receive?

- What percentage of graduation-eligible (high school) pregnant and parenting teens graduates from high school?

- What percentage of participants who graduate from high school or complete a GED enroll in an IHE?

- What percentage of pregnant and parenting IHE students either graduate at the end of the semester/quarter or enroll in the next semester/quarter?

- How many pregnant teens or women who are victims of domestic violence, sexual violence, sexual assault, and stalking receive supportive social, accompaniment, or intervention services?

- How many and what types of campaigns have been carried out to increase public awareness and education about services available to expectant and parenting teens, women, fathers, and their families?

Exhibit 1–PAF Performance Data Requirements Based on Implementation Category

Type of Respondent	Performance Data/Measures
All Grantees *(N=17)*	**Participant Characteristics (17 measures)** –Participant by type (e.g., expectant teen [<20 years], parenting woman [>19 years]) –Participant's extended family members (e.g., parents, grandparents, spouses) –Participant's age, race, ethnicity, and English proficiency status –Participant's marital status, living arrangement, and co-parenting status **Receiving and Giving Financial and Social Support** –Financial or social support received from fathers by participating expectant and parenting teens and women –Financial or social support provided by participating fathers **Services Utilization** –Participants' receipt of direct services by type of service –Participants' receipt of a referral for service, by type of service **Staff Development and Agency Partnerships** –New and existing program staff that receive initial or supplemental training –Number and tenure of formal and informal implementation partners
Category 1 Grantees (N=2): Implementing activities to support expectant and parenting student services at institutions of higher education (IHE)	**Participant Characteristics & Outcomes (4 measures)** –Expectant or parenting IHE students by type of IHE in which they are enrolled – Expectant or parenting IHE students that graduate – Expectant or parenting IHE students that enroll in next quarter/semester –Rapid repeat pregnancy (during program year) among parenting teen IHE students
Category 2 Grantees (N=14): Implementing activities to support expectant and parenting teens at high schools (HS) and community service centers (CSC)	**Participant Characteristics & Outcomes (6 measures)** – Expectant or parenting students by HS enrollment status and grade level – Expectant or parenting students' HS dropout rate – Expectant or parenting seniors' HS graduation rate – Expectant or parenting teens who completed a General Education Diploma (GED) –IHE enrollment among expectant or parenting teens who graduate from HS or complete GED –Rapid repeat pregnancy (during program year) among parenting teens
Category 3 Grantees (N=6): Implementing activities to improve services for eligible pregnant women who are victims of domestic violence, sexual violence, sexual assault, and stalking;	**Service Utilization & Training Outputs (2 measures)** –Participants' receipt of intervention or supportive social services –Staff from public, private nonprofit, and other agencies that receive training on violence against pregnant and parenting teens and women
Category 4 Grantees (N=13): Implementing public awareness and education activities	**Outputs (1 measure)** –Types of public awareness campaigns implemented

3. Use of Improved Information Technology and Burden Reduction

OAH will utilize electronic technology to reduce the burden of PAF reporting. All PAF grantees will report aggregate performance data into a web-based reporting system (*PAF Performance Data System [PDS])* that will conform to all HHS requirements and guidance for security, accessibility, and usability. The PDS will produce a fully validated data set (aggregate and grantee-level) that is ready for tabulation and analysis by OAH staff. The system will have several features that reduce the burden for grantees and OAH staff alike. For example, the website will use the grantees' login credentials to generate a list of *required* measures that is tailored to the scope of the grantee's PAF project. This feature will simplify reporting and eliminate the risk of confusing or overwhelming users with a list of all PAF performance measures, including those for which they are not required to submit data. In addition, the reporting tables will have auto-summing rows and columns and the system will perform within and cross table validations during data entry, thereby increasing the accuracy and early detection and correction of reporting errors. Finally, OAH will provide user-friendly system documentation, training webinars, and e-mail and phone access to a helpdesk.

Draft code for the PDS was developed prior to the final selection of performance measures and as a result, the code will require enhancements to ensure that the system is operating properly, collecting the final OMB approved measures, and is user friendly; enhancements will include pre-populating the reporting periods and pre-populating the final measures.

4. Efforts to Identify Duplication and Use of Similar Information

The proposed data collection is the only source of uniform performance data for all PAF grantees. Because PAF is a new HHS program, no duplicate data exists in the form needed by OAH to administer and monitor more effectively the PAF program and individual grants.

5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this study.

6. Consequences of Not Collecting the Information/Collecting Less Frequently

OAH will use the PAF performance data to administer the PAF program and manage PAF awards and projects; measure and monitor project implementation, outputs, and outcomes. Collecting the performance data will enhance OAH's ability to monitor the PAF program and allow grantees to track their progress toward program goals.

Annually, PAF grantees will report PAF performance data within three-months (by October 30) of the end of the reporting period (August 1 to July 31). Collecting PAF performance data less frequently than annually will deprive OAH of timely information about program implementation and performance and severely hamper OAH's to manage the PAF program and grant awards. There are no legal obstacles to reduce the burden.

7. <u>Special Circumstances Relating to the Guidelines of 5 CFR 1320.5</u>

The proposed data collection is consistent with guidelines set forth in 5 CFR 1320.5.

8. <u>Comments in Response to the Federal Register Notice/Outside Consultation</u>

Federal Register Notice Comments. A 60-day Federal Register Notice was published in the Federal Register on Tuesday, September 24, 2013, Volume 78, Issue 185, Page 58539. (see Attachment C). There was one set of public comments received from the State of New York Department of Health. The comments, with response, are summarized below in Exhibit 2.

Exhibit 2: Public Comments and Response

Comment	Response
#0.03- The age categories cut off at 20 even though some grantees are serving students in institutions of higher education (IHE). We recommend extending the age bracket up to at least 24 years of age because the 20-24 age bracket typically has the highest birth rate.	Although the majority of projects are serving high school age students, OAH can add a 20-24 year old age category to this field to specify these numbers.
#0.06- This is measure is unclear and appears to be very subjective. We recommend providing a tool to assess English language proficiency, provide better definitions to measure proficiency, or perhaps use a different measure, such as the language predominantly spoken in home. Our sites have expressed concern that a standardized tool to measure English proficiency would be too burdensome, and recommend identifying the individual's primary language and/or ask individual to self-identify as understanding English.	OAH would like to minimize burden for recipients and does not recommend a standardized tool to measure English proficiency be administered. If additional comments come into OAH, OAH would consider substituting this question with a question regarding the language spoken at home by the participant, which is currently used as a performance measure for the Teen Pregnancy Prevention Program (TPP).
0.08- Several of the options could be interpreted as not mutually exclusive (i.e., b) Lives with spouse/partner and c) Lives with parent(s) could both be true for a participant). We recommend clarifying or simplifying the living arrangement options. Our sites have recommended adding an option for "participant declines to answer" and/or "missing."	This question can be clarified by having respondents select the best answer of the following options. OAH can also add a field for "declines to answer."
More detailed instruction is needed indicating when data is expected to be collected, how often, and whether updated information for clients should be reported or clients should be reported only once over the course of the program.	Demographic data (questions 0.04-0.10) will only be collected at baseline. Other data should be updated annually. All grantee instructions will clearly describe this information.
One focus of our initiative is systems-level work, fostering linkages between the schools/IHEs and community providers to promote sustainability. We recommend adding more comprehensive measures regarding the number and strength of linkages, the number of new partners engaged during the reporting year, or the comprehensiveness of linkage networks.	OAH prefers to be broad in its collection of partnership data across grantees since each PAF grantee works with its partners in different ways. Individual grantees are welcome to develop more specific performance metrics to assess their program sites.

Outside Consultation. OAH has consulted with staff from the Centers for Disease Control and Prevention and RTI International about the PAF performance measures data collection. RTI is the contractor responsible for assisting OAH with evaluation of the first cohort of PAF grantees. **Exhibit 3** presents the name, affiliation, and contact information for individuals who provided consultation on the proposed collection.

Exhibit 3–Outside Consultation

Year	Name/Title/Affiliation	Contact Information

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2012–13	Barri Burrus, PhD, *RTI Project Director* RTI International	Phone: 919-597-5109 E-mail: burrus@rti.org
2012–13	Christina Fowler, PhD, *Task 3/Performance Measures Lead* RTI International	Phone: 919-316-3447 E-mail: cfowler@rti.org
2012–13	Lorrie Gavin, PhD, *Scientist* CDC Division of Reproductive Health	Phone: 770-488-6284 E-mail: lcg6@cdc.gov
2012–13	Kathleen Krieger, MPH, *RTI Project Coordinator/Analyst* RTI International	Phone: 919-541-6175 E-mail: kkrieger@rti.org
2012–13	Ellen K. Wilson, PhD, *RTI Associate Project Director* RTI International	Phone: 919-316-3337 E-mail: ewilson@rti.org

9. Explanation of Any Payment/Gifts to Respondents

OAH will not make payment or provide gifts to respondents.

10. Assurance of Confidentiality Provided to Respondents

OAH provides no assurance of confidentiality of performance data submitted by PAF grantees. Grantees will report PAF performance data as aggregate totals; no individual can be identified based on the reported data.

11. Justification for Sensitive Questions

Although the PAF performance data contains several data items of a sensitive nature (e.g., participant race, or status as a victim of domestic violence, sexual violence, sexual assault, and stalking), individuals cannot be identified in the data because grantees will report only aggregate data. These sensitive data items will help the program office monitor granteewith program regulations and guidelines, performance reporting, and ongoing program management.

12. Estimates of Annualized Hour and Cost Burden

A.12A Estimated Annualized Burden Hours

The estimated annualized hour burden of responding to this information collection is **492 hours,** or an average of **29 hours per respondent;** the respondent is the individual grantee and OAH awarded 17 grants for a four year project period beginning July, 2013 (see **Exhibit 3**). The hour-burden estimates include the time spent by grantee staff to retrieve, compile, record, and verify the performance data, and exclude any hour burden associated with customary and usual practices that the grantee would carry out in the absence of the PAF reporting requirement.

Exhibit 4–Estimated Annualized Burden Hours

Form	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Respondent	Total Burden Hours
Participant & Partner Characteristics *(16 measures)*	All Grantees	17	1	19	323
Category 1 Measures *(4 measures)*	*Category 1 Grantees:* Implementing activities to support pregnant and parenting student services at institutions of higher education	2	1	6	12
Category 2 Measures *(6 measures)*	*Category 2 Grantees:* Implementing activities to support pregnant and parenting teens at high schools and community service centers	14	1	9	126
Category 3 Measures *(2 measures)*	*Category 3 Grantees:* Implementing activities to improve services for pregnant women who are victims of domestic violence, sexual violence, sexual assault, and stalking;	6	1	3	18
Category 4 Measures *(1 measures)*	*Category 4 Grantees:* Implementing public awareness and education activities	13	1	1	13
	Total	17	–	–	492

The annualized average burden estimate assumes that grantees would already collect some of the required measures for administrative purposes, such as the number of participants by age, race, gender, etc., and the number of participants that received different services. The annualized average burden estimate accounts for differences in the number of required measures across grantees. As shown in **Exhibit 4**, all grantees will be required to report data for 17 measures. In addition, grantees will be required to report data for measures that are specific to their implementation category. For example, a grantee implementing activities in Categories 1 and 4 will report data for 22 required measures, while another grantee that is implementing activities in Category 2 alone will report data for 23 required measures. Furthermore, based on experience, OAH assumes that the annualized average burden estimate will (i) decrease over the 3-year approval period as grantees implement and refine systems and procedures for compiling, reviewing, and reporting the PAF performance data (Year 1=42 hours, Year 2=26 hours, and Year 3=20 hours) and (ii) that the hour burden is inversely related to the information technology capacity of individual grantees.

A.12B Estimated Annualized Cost to Respondents

The estimated annualized labor cost to report the PAF performance data is **$26,280** or an average of **$1,546** per grantee respondent; there will be a total of no more than 22 grantee respondents (see **Exhibit 5**). The hourly wage rate is a weighted average based on the percentage distribution of the

hour burden across four different categories of grantee labor (i.e., clerical/unskilled, skilled/technical, managerial or professional, and executive). The average wage rate for each labor category is from the May 2011 U.S. Bureau of Labor Statistics wage estimates for the health care and social assistance sector.[1]

Exhibit 5–Estimated Annualized Cost to Respondents for Information Collection

Type of Respondent	Total Burden Hours	Average (Weighted) Hourly Wage Rate	Total Respondent Cost
Grantees	492	$40	$19,680

13. Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers/Capital Costs

There are no nonlabor costs–capital and startup or operation, maintenance, and purchased services–associated with this information collection.

14. Annualized Cost to Federal Government

The estimated annualized cost to the federal government for collecting PAF performance data is $52,000; this includes approximately $50,000 per year for a contractor to finalize and maintain the PDS and provide training and technical assistance to grantee staff and approximately $2000 per year for federal staff. These figures take into account OAH's experience collecting and processing similar performance measures data for the first cohort of Teen Pregnancy Prevention (TPP) grantees. The costs include the federal staff time associated with developing the performance measures, reviewing the annual data reports by PAF project officers and administrators and overseeing the work of the Performance Data System Contractor, the cost of refining and operating the Performance Data System and training the PAF grantees in its use.

15. Program Changes or Adjustments

This is a new data collection.

16. Plans for Tabulation and Publication and Project Time Schedule

OAH is requesting the maximum 3-year clearance for the PAF performance data collection to allow grantees to collect and report performance data for three reporting periods (August 1 to July 31) and that accounts for the 3-month period between the end of each reporting period and the annual report due date (October 30). The data collection requirements should be approved by October 15, 2013.

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1 Bureau of Labor Statistics. *May 2011 National Industry-Specific Occupational Employment and Wage Estimates, Sector 62–Health Care and Social Assistance.* Accessed February 21, 2013 from http://www.bls.gov/oes/current/naics2_62.htm#11-0000.

Exhibit 6–Project Time Schedule in Months from OMB Approval

Task/Activity	Months from OMB Approval		
	Year 1	Year 2	Year 3
PAF performance data collection (August 1 to July 31)	0–9	10–21	22–33
PAF performance data submission (October 30)	12	24	36
PAF performance data tabulation and analysis	13–14	25–26	37–38

17. Display of Expiration Date for OMB Approval

The expiration date for OMB will be displayed on all data collection instruments.

18. Exceptions to Certification Statement.

There are no exceptions to the certification.

B. Data Collection Procedures

PAF grantees will report the annual performance data for required and optional measures using the web-based *PAF Performance Data System* (PDS). The PDS will be dedicated solely to the collection and management of PAF performance data. An OAH contractor designed and built draft code for the PDS website according to industry and Department of Health and Human Services (HHS) best practices and standards for security (e.g., privacy and access controls, data transmission, and data storage and backup), accessibility, and look-and-feel. The OAH contractor will ensure that the website interface will be user-friendly, intuitive, and easily understood.

1. Reporting Period and Submission Deadline

The 12-month reporting period for the annual report is **August 1** to **July 31**, and the due date for submitting PAF performance data is **October 30**.

2. Data Security and Access

The OAH contractor will ensure that the system's security features are appropriate for the system's security categorization (i.e., Federal Information Processing Standard [FIPS] 199). The PDS is likely to be classified as negligible risk system because PAF grantees will report only aggregate data that excludes personal identifiers and personal health information.

Users of the PDS website must be registered and authorized ("enabled") by OAH to access the private (secure) pages of the website. A user's role in submitting and managing PAF performance data will determine their website access privileges. The website will accommodate two roles: End User (grantee) and Administrator (OAH staff). The user's role determines the website pages, features, and performance reports that are available for viewing or other actions. Each OAH staff and grantee user will be assigned a unique username and

password (8 or more characters long and comprised of letters and numerals only); the username and password will be associated with the users' authorized role in the system. The PDS will accept multiple users from a single grantee. Multiple users from a single grantee will be able to view the data entered by other users from their agency. However, grantees will not be able to view the performance data of other grantees. Role-specific views and features include:

- End User (Grantee):
  - *Data Submission:* Upload aggregate performance data into the online system for each required and optional measure.
  - *Data Review:* View/edit performance data, as required.
- Administrator (OAH staff):
  - *User account administration:* Create new or disable existing user accounts (grantee and OAH staff accounts) and reset passwords.
  - *Grantee creation:* Add or edit the list of grantees that are required to submit performance data.
  - *Edit performance measures:* Edit performance measures, as appropriate.
  - *Report review:* View performance measure data across grantees for individual performance measures and for all performance measures.
  - *Data export:* Export performance data in CSV format for further analysis in Excel or other software. Data can be exported by grantee, by type of PAF implementation category, or for all grantees.

Electronic data submission will occur via a secure Internet connection. All transmissions will be encrypted with 128-bit encryption through secure socket layers (SSL) and verified by a VeriSign®, the leading SSL Certificate authority.

3. **Data Submission and Validation: Required, Optional, and Grantee-Defined Measures**

Based on the grantees' login credentials (user name and password), the PDS website will display a list of the measures for which grantees are required to submit data. The PDS website will display the valid OMB control number and expiration date for the PAF performance measures, as well as the Paperwork Reduction Act (PRA) Public Burden Statement. Each required measure will include link that users can click on to enter data into a measure-specific reporting table. In addition to the required performance measures, grantees may **voluntarily** submit performance data for one or more of 38 optional performance measures. The PDS will allow the grantee to choose optional measures using radio buttons that, when selected, will add the measure and a link to the list of measures for which the grantee will submit data. In addition, the system will incorporate an "other specify" option under the optional measures feature that grantees may select if they want to define and track

performance on measures that they define. The reporting tables for the required and optional measures will have auto-summing rows and columns, where appropriate, and the system will perform within and cross table validations during data entry to allow early detection and correction of reporting errors.

4. User Support

To ease grantee reporting, OAH will provide user-friendly system documentation, training webinars, and e-mail and phone access to a helpdesk.

5. Software Environment

The OAH contractor has built the draft PDS using .NET. The database will be SQL Server 2008.