

REQUEST FOR NON SUBSTANTIVE CHANGE TO EVALUATION OF YOUTH CAREERCONNECT, OMB 1291-0003

This non-substantive change request is to update the language in the parent consent form and student assent form for the Evaluation of Youth CareerConnect study, OMB Control Number 1291-0003. The revised language does not affect study design or change burden estimates, but informs participants that student records may be matched with other administrative records in the future. It also informs individuals that we received a Certificate of Confidentiality from the National Institute of Child Health and Human Development (NICHD) which further ensures their information will be kept confidential to the extent allowable by law.

The first requested change makes explicit to study participants that we will collect administrative data and that these records may be matched with other administrative records in the future. The requested changes are:

- On the **parent consent form**, change the first bullet in the list of permissions from “Mathematica can request my student’s school records. This includes information like attendance, test scores, or grades,” to “Mathematica can use my student’s information below and can obtain my student’s school records. This includes information like attendance, test scores, or grades.”
- On the **parent consent form**, add “My student’s information may be linked with federal or state administrative data for future study purposes” to the bulleted list of permissions.
- On the **student assent form**, add the sentence, “Your information may be linked with federal or state administrative data, such as your school grades or attendance record, for future study purposes” to the first paragraph, which describes the information that will be collected during the study.

The second requested change updates information on privacy protections to reflect the Certificate of Confidentiality we received from NICHD. The requested changes are:

- On the **parent consent form**, change the sentence, “I understand that all information provided to the study will remain private as required by the Family Educational Rights and Privacy Act (FERPA).” to “I understand that all information provided to the study will be protected from unauthorized disclosure as required by the Family Educational Rights and Privacy Act (FERPA).”
- On the **parent consent form**, add a Certificate of Confidentiality box that states:

We will do everything we can to keep unaffiliated third parties from learning about your participation in this study. To further help us protect your privacy, we have obtained a Certificate of Confidentiality from the U.S. Department of Health and Human Services (DHHS). With this Certificate, we cannot be forced (for example by court order or subpoena) to disclose information that may identify you in any federal, state, local, civil, criminal, legislative, administrative, or other proceedings. The researchers will use the Certificate to resist any demands for information that would identify you or your child, except to prevent serious harm to you or others, and as explained below.

You should understand that a Certificate of Confidentiality does not prevent you, or a member of your family, from voluntarily releasing information about yourself or your child, or your involvement in this study. If an insurer or employer learns about your participation, and obtains your consent to receive research information, then we may not use the Certificate of Confidentiality to withhold this information. This means that you and your family must also actively protect your own privacy. You should understand that we will in all cases, take the necessary action, including reporting to authorities, to prevent serious harm to yourself, children, or others. For example, we will comply with all child abuse and neglect mandatory reporting laws. A Certificate of Confidentiality does not represent an endorsement of the research study by DHHS or the National Institutes of Health.

- On the **student assent form**, change the sentence in the first paragraph that reads, “All the information you give will be protected from unauthorized disclosure,” to “All the information you give will be protected and used only for research.”
- On the **student assent form**, add a Certificate of Confidentiality box that states:

We will do everything we can to keep others from learning about your participation in this study. To further help us protect your privacy, we have obtained a Certificate of Confidentiality from the U.S. Department of Health and Human Services (DHHS). With this Certificate, we cannot be forced (for example by court order or subpoena) to disclose information that may identify you in any federal, state, local, civil, criminal, legislative, administrative, or other proceedings. The researchers will use the Certificate to resist any demands for information that would identify you or your child, except to prevent serious harm to you or others, and as explained below.

You should understand that a Certificate of Confidentiality does not prevent you, or a member of your family, from voluntarily releasing information about yourself or your child, or your involvement in this study. If an insurer or employer learns about your participation, and obtains your consent to receive research information, then we may not use the Certificate of Confidentiality to withhold this information. This means that you and your family must also actively protect your own privacy. You should understand that we will in all cases, take the necessary action, including reporting to authorities, to prevent serious harm to yourself, children, or others. For example, in the case of child abuse or neglect. A Certificate of Confidentiality does not represent an endorsement of the research study by DHHS or the National Institutes of Health.

This request will not place a reporting burden on parents, students, or Youth CareerConnect grantees as data collection has not yet begun.