DATE: August 10, 2015

TO: Stephanie Tatham

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

FROM: Brendan Kelly

Office of Planning, Research and Evaluation (OPRE)

Administration for Children and Families (ACF)

SUBJECT: Request for Non-Substantive Change to Pathways for Advancing Careers and Education (PACE) Study Data Collection Plan (OMB Control Number 0970-0397)

**Background on the PACE Impact Study**

The Pathways for Advancing Careers and Education (PACE) Study data collection approved under OMB Control Number 0970-0397 includes baseline data collection for study participants at program enrollment and follow-up surveys conducted 15 months and 36 months after random assignment. To help ensure the study team can reach study participants for the follow-up surveys, the participants are contacted periodically to confirm or update the contact information provided at enrollment or through the interim tracking efforts.

**Current Protocol for Communicating With Study Respondents**

A major challenge presented by this study is the ability to retain participants between the baseline and the first and second follow-up surveys. The first follow-up survey occurs 15 months after respondents enroll in the study, and the second survey occurs 36 months after baseline. With a large a span between survey waves, keeping in touch with respondents is absolutely critical to achieve high response rates at each round. Therefore, our protocol includes a series of communication strategies to keep in regular contact with respondents and to request their updated contact information. These currently include interim mailings four, eight, and twelve months after random assignment. These communications are spaced four months apart during each round of the data collection. To ensure that the interviewers can find study participants again at 36 months, these same communications start up again four months after the case is closed for the 15-month follow-up survey.

**Proposed Update to Protocol for Communicating With Study Respondents via Text Messaging**

Text messaging is rapidly becoming a common – and preferred—form of communication. (<http://www.pewinternet.org/2011/09/19/americans-and-text-messaging/>).

In this modification, we are seeking approval to capture explicit ***permission*** to communicate with study participants via text messaging using data the respondent has already provided (cell phone number).

We will request permission to text participants on the contact update form and in the survey instruments. The revised contact update form and survey text are provided as Attachments A and B respectively. Text messages may come from one of two sources—an individual or from an automated service. We only plan to implement direct, interviewer to respondent texts at this time. There are no current plans to administer automated text messaging. However, to comply with federal regulations regarding the use of automated texting, we have included permission for automated texting as well as individual level texting to keep the automated texting option open if it is determined to be cost-efficient in the future.

Interviewer to respondent texts will be used in three instances: 1) to confirm an appointment; 2) to indicate a delayed arrival for an appointment; and 3) to indicate that interviewer has arrived for an interview.

If pursued later, automated text messages would include provisions to allow respondents to opt out of future automated texting. Examples of ways we may use automated texting include:

* Confirm text permission/cell phone belongs to respondent;
* Request updated contact information from respondents;
* Remind respondents of upcoming survey invitations and interviews; and
* Schedule and confirm interview appointments.

This request seeks approval to add two yes/no questions to the tracking form and two questions to the 15- and 36-month follow-up surveys.[[1]](#footnote-1) These questions pose minimal burden on the respondent and will not result in any change to the overall burden estimates. These questions do not capture any PII or other substantive data. However, having the ability to communicate via text is expected to help increase communication with study participants, which will in turn help with the locating efforts during follow-up study data collection. OPRE requests approval to implement these changes as a non-substantive change to the data collection plan approved under OMB Control Number 0970-0397.

**Expected Benefits**

Adding a text message protocol benefits the study by allowing participants to communicate via text messaging, which is increasingly becoming the preferred mode of contact for many people. Offering additional methods for respondents to communicate with the study team could help improve the return rates for the contact information form and reduce no-shows for scheduled interview appointments. Improved contact update return rates ensure that the respondent contact data are as up to date as possible—and updated contact information is essential to maximizing the response rates to the follow-up surveys.

There are costs to conduct automated text messaging. At this time, OPRE and its contractor are not planning to implement automated texting. We seek approval to add these questions at this time to help the team to assess respondent reaction to automated texting and provide data necessary to accurately assess potential costs should we pursue automated texting in the future. If response is favorable, and a cost-efficient method is identified, OPRE may pursue automated texting at that time.

**Proposed Procedures for Text Message Communications**

Study participants who have provided a cell phone number may be contacted via individual text message, which consists of a direct text message between the interviewer and study participant. *Individual text messages* from interviewers will be sent only from study issued cell phones, not from an interviewer’s personal cell phone. No PII will be stored on the cell phone or included in the text message. Text messages will be sent as a secondary or tertiary form of contact. There will be contact by phone or email first.

Interviewer to respondent texts will be used in three instances: 1) to confirm an appointment; 2) to indicate a delayed arrival for an appointment; and 3) to indicate that interviewer has arrived for an interview.

Although no plans are in place to pursue *automated text messaging yet,* an automated text message could be used to: 1) confirm text permission/cell phone belongs to the respondent; 2) remind participants to complete and return a contact update form; 3) to alert participants that it is time for them to participate in the follow-up survey; and 4) schedule and confirm interview appointments. If pursued, participants would be allowed to opt out of future automated texting.

1. The questions would be added to the 36-month follow-up survey as well in case OPRE decides to pursue another follow-up at 60 months post random assignment. [↑](#footnote-ref-1)