
**SUPPORTING STATEMENT A FOR INFORMATION
COLLECTION IN THE
ASSETS FOR INDEPENDENCE (AFI)
PROGRAM EVALUATION**

OMB No. 0970-0414

Office of Planning, Research, and Evaluation
Administration for Children and Families
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Washington, DC 20447

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ASSETS FOR INDEPENDENCE (AFI) PROGRAM EVALUATION

SUPPORTING STATEMENT

A. JUSTIFICATION

In this document, we request OMB clearance for follow-up data collection activities for the Assets for Independence (AFI) Program Evaluation (hereafter, AFI Evaluation). This submission seeks OMB approval for one data collection instrument, which will be used to survey the enrolled study sample at 36 months following baseline

OMB previously approved the baseline survey, 12-Month Follow-Up Survey, and Implementation Interviews guide in a prior package (August 2012). All previously approved information collections will be complete prior to review of this request; therefore no burden for those ICs is included in this request.

This section provides supporting statements for each of the eighteen points outlined in Part A of the OMB guidelines for the collection of baseline information in study sites in the AFI Evaluation.

1.) Necessity for the Data Collection

Study Overview

The U.S. Department of Health and Human Services, Administration for Children and Families (ACF) is conducting an experimental evaluation of the Assets for Independence (AFI) Program. Launched in fall 2011, this evaluation—the first experimental evaluation of IDA projects operating under the Assets for Independence Act—will contribute importantly to understanding the effects of Individual Development Account (IDA) projects and IDA project features on participants. IDA programs provide matching funds to participants when the savings are withdrawn to spend on qualified asset purchases, most commonly homeownership, business-related expenses, or education.

This evaluation focuses on the impact of AFI program participation on short-term savings, savings patterns and asset purchases by low-income individuals and families. This experimental study builds on prior quasi-experimental AFI research, as well as various studies of other non-AFI funded IDA projects, and offers the first rigorous, experimental test of the AFI program. While research suggests that IDAs help low-income families save, both experimental research generally and AFI-specific research are limited. This random assignment evaluation will improve understanding of the program's overall impact on early participant outcomes. Baseline data collection for the evaluation, including participant enrollment, occurred from January 2013 through July 2014. The final report with results from the 12-month follow-up data collection will be available in early 2016.

ACF intends to extend and build on the current research on select AFI-funded IDA projects

being undertaken as a part of the AFI evaluation by implementing 36-month follow-up data collection and analysis of the data. Through the design of the AFI-funded IDA projects and the theory of change underlying IDA programs, ACF expects that the program effects will materialize over time. ACF is interested in assessing the longer-term impacts of the AFI-funded IDA projects on participant outcomes (e.g. savings, savings patterns and asset purchase). Follow-up data collection for the AFI experiment will focus on key outcomes of interest to the AFI program, including: savings behavior/patterns, total savings, savings rates, income, home ownership/purchase, additional postsecondary education attained, new business started, employment, and earnings. Other outcomes that may be measured include: total assets, debts, net worth, credit score, mortgage delinquency, and use of means-tested public benefits.

In 2008, ACF contracted with the Urban Institute and its partners (the Center for Social Development at Washington University in St. Louis and the Center for Community Capital at the University of North Carolina at Chapel Hill) to develop and recommend a design for the next-phase AFI evaluation. As part of that design project, the research team conducted an extensive literature review, including the prior AFI evaluation and other IDA research, and convened key stakeholders to discuss key research questions, gaps in existing knowledge, and potential research methods for the next evaluation of the AFI program. The consensus of this work was that rigorous, experimental research on the AFI program is needed for several reasons. First, while the First Phase AFI evaluation laid an important foundation for AFI research, its design features (i.e., use of a comparison group derived from the Survey of Income and Program Participation, use of a national and not site-specific sample, sample size, etc.) left the field and ACF with unanswered questions about the program's impacts on participants. Second, very few experimental studies of IDA programs have been conducted to date, most notably the American Dream Demonstration Experiment in Tulsa and a more recent evaluation of Canada's Learn\$ave program. Lastly, the AFI legislation requires that the program be evaluated using a control group. At the conclusion of the design contract, the research team developed an evaluation design that included an experimental, three-group test that compared a control group with two variations on the treatment.

Notably, resource constraints imposed by the AFI legislation – the legislation caps evaluation spending at \$500,000 per year – prohibited ACF from fully implementing the design proposed under the design contract. Similarly, an in-depth review of AFI grantees revealed that none had the capacity to recruit 900 AFI-eligible cases and serve 600 clients. As a result, ACF has implemented an evaluation design that uses the experimental nature of the proposed design, but has been adapted to meet fiscal and programmatic realities.

The evaluation is currently underway in two AFI grantee sites. Each site has randomly assigned approximately 800 sample members to one of two groups: a control group and a treatment group receiving conventional AFI services. The two primary research questions the study seeks to answer are:

- What is the impact of AFI project participation on short-term outcomes such as savings, asset purchases, and avoidance of material hardship?
- How do specific AFI project design features affect short-term participant outcomes?

The study employs a (i.e., two-armed, treatment vs. control) experimental design. This design

will allow the first question above to be addressed using a rigorous randomized approach. The second question will be addressed empirically, but without the benefit of random assignment (due to grantee capacity).

In addition to the impact study, the evaluation includes an implementation study to describe and document how the AFI program is designed, implemented and operated in the participating grantee sites during the time of the study. It will also explore any challenges that the grantees face and their strategies for overcoming them. This information will be used to provide context for interpreting the findings from the impact analysis and the generalizability of findings to other AFI grantees. It is important that this work be conducted while the study participants are participating in the program so that the information gathered accurately reflects the experiences of participants.

Legislative Mandate for Evaluation

The Assets for Independence Act (1998), which authorized the AFI program, requires that the program be rigorously evaluated by an independent research organization, specifying the use of a control group. The legislation also outlines a number of factors to be included in the evaluation, among them:

- **effects of incentives and organizational or institutional support on savings behavior;**
- **savings rates of individuals based on demographic characteristics (e.g., gender, age, family size, race or ethnic background, and income);**
- **economic, civic, psychological, and social effects of asset accumulation; and**
- **effects of individual development accounts on savings rates, homeownership, level of postsecondary education attained, and self-employment;**

Insufficient Data Available

The data collection instrument in this request is necessary to meet the AFI legislation's evaluation requirements around rigor and outcomes to be measured. Annual grantee reports are insufficient to meet the legislation's evaluation requirements. The 36-month follow-up survey instrument in this request is essential to gathering individual-level information on the intermediate outcomes required by legislation. Annual grantee reports do not capture important individual-level data, such as sources of income, material hardship, psychological measures, or civic engagement. Further, AFI grantees only collect data on the participants, meaning that they do not have any data for members of the control group and any members of the treatment group who do not follow through with services. This information is needed for a rigorous experiment.

2. Purpose of Survey and Data Collection Procedures

As discussed above, the purpose of this study is to assess the impact of participation in AFI-funded individual IDA projects on the savings, asset purchases, and economic well-being of low-income individuals and families. This follow-up study will be an impact study to assess the

impacts of program participation on intermediate outcomes of interest. The data collection instrument contained in this request is central to the successful execution of both components of the study. Below, we briefly outline the information we have or are in the process of collecting (as previously approved by OMB) and then describe the new information we intend to gather, how it will be used, how the collection will be executed, and the intended benefits of the collection.

Site Selection and Recruitment (Completed)

The evaluation team identified grantees that met specific criteria in addition to the capacity to recruit sufficient sample and willingness to participate in the random assignment experiment.

Selection Criteria:

- Have received their first grant in 2006 or earlier (meaning that they have completed a full five-year grant period for at least one grant);
- Have a grant that was active during FY 2011;
- Have opened at least 600 IDAs across all of their grants; and
- Show some indication of potential capacity to participate in the evaluation through meeting one of the following three criteria:
 - (1) having a new grant awarded in FY 2011 of at least \$300,000;
 - (2) having a grant expiring in FY 2011-FY 2013 of at least \$300,000 (possibly indicating the capacity to apply for a new grant of that size); or
 - (3) having at least one grant under which 400 or more IDAs were opened.

The evaluation team identified and recruited two sites that are currently participating in the evaluation: one in Albuquerque (NM) and one in Los Angeles (CA). The Albuquerque site is operated by Central New Mexico (CNM) Community College, a subgrantee of Prosperity Works (PW). In presenting the study's findings, we will clearly indicate how the sites were selected and what this implies for the interpretation of the study's findings.

Current or Completed Information Collection (Previously Approved)

- 1.) **Informed Consent:** A baseline consent form was administered when participants enrolled in the study. This baseline consent included a statement informing participants about completing annual follow-up surveys for the next three years allowing for the possibility that the evaluation will be extended beyond the 12-month follow-up interval. Including this statement prevents having to obtain additional consent for an extended evaluation. The follow-up survey for later survey waves is the same as the instrument to be used at the 12th month, thus the multi-year consent is an informed consent. Further, gathering consent for an extended period of time is preferable to re-consenting annually. Annual re-consent would likely result in unacceptably high sample attrition among control cases, as these cases would have little reason to re-consent. (Prior to random assignment, the incentive to provide consent comes through one's understanding that the only way to enter the AFI project is via random assignment, accepting a 50 percent chance of becoming a control case.)

- 2.) **Baseline and 12 Month Follow-Up Questionnaires:** These questionnaires were administered to members of both treatment groups and the control group at study intake (baseline) and 12 months following random assignment. As of August 2015, baseline data collection is complete and the 12 month follow up data collection will be completed by September 7, 2015. For more information about these instruments, see the previously approved justification package for this evaluation.
- 3.) **Implementation Interview Instrument:** The implementation interviews were conducted during site visits prior to the start of 12-month survey data collection. The approved instrument is a semi-structured questionnaire, consisting of four parts: basic information on the grantee/subgrantee organization and the AFI project; project operations during sample recruitment and project enrollment; program services to cases assigned to the control group; and challenges faced regarding the AFI program evaluation. For more information about this instrument, see the previously approved justification package for this evaluation.
- 4.) **Locating Materials:** The locating materials provide the evaluators with the participants' updated contact information. This information has been and will continue to be very important for locating study participants for the follow-up surveys. This information will be gathered voluntarily, via US Postal Service, with respondents being given the opportunity to submit their updated contact information via a postage-paid envelope. The contact information gathered will only be used for location purposes and will not be contained in any publication. AFI program participants are lower-income individuals who often experience high mobility. As such, collecting these data on contact information is critical to successfully locating and then administering the follow-up survey to the study participants. We will continue to collect contact update information for the 36-month follow up survey. The locating materials are included as Attachment G.

New Information Collection Request

- 1.) **AFI 36-Month Follow-Up Questionnaire:** The evaluation intends to collect survey data from all study participants (i.e., members of both treatment groups and the control group) at 36 months following random assignment. **The 36-month questionnaire has been updated to reflect the change in time period, but otherwise remains the same as the previously approved 12-month follow-up survey.**

The questionnaires are divided into sections based on demographics, financial experiences and other main topics. These questions allow estimation of the incidence, prevalence, and patterns of savings, debt, and asset accumulation. The proposed questionnaire content is shown in AFI Follow-Up Questionnaire (See Instrument 1). While the actual administration will be electronic, the document shown is a paper representation of the content that is to be programmed. Programmed screen shots of the site management system can be found in Attachment D.

- The follow-up survey will be administered using computer-assisted telephone interviewing (CATI) and will also be offered online. It will be a 60-minute telephone survey undertaken approximately 36 months after random assignment for all sample members.

The information gathered in this survey is critical to estimating the impacts of AFI program participation and will be the principal source of data for the impact analysis. Even with random assignment, there will be some treatment-control differences in baseline characteristics, as a result of sampling variation. Improved estimates of the treatment effect on measured outcomes will be obtained through multivariate models that include baseline survey items as explanatory variables, in addition to a dummy variable indicating the treatment-control status of each case. The administrative datasets maintained typically by AFI grantees will provide too few baseline characteristics on a consistently measured basis (for both treatment and control cases) to adequately control for such sampling variation.

3. Improved Information Technology to Reduce Burden

The follow-up survey will be administered using computer-assisted telephone interviewing (CATI) and via online survey. The CASI/CATI technology affords a number of advantages in the collection of survey data. The CASI/CATI questionnaire will be programmed to implement complex skip patterns and fill specific wordings based on answers previously provided by the respondent, assuring that only relevant and applicable questions are asked of each respondent. A second feature relates to the consistency of data. The computer can be programmed to identify inconsistent responses and can automatically resolve them through carefully worded respondent prompts. Respondent-resolved inconsistencies will result in data that are more accurate than when inconsistencies are resolved using editing rules. CASI/CATI technology also provides the respondent with a methodology that improves privacy and enhances response validity and response rates. For example, for key questions that determine net worth, we will ask respondents for the specific amount of an asset. If a specific amount cannot be given, we will display a range of values. Only if the respondent still cannot provide an estimate or range will they then be able to select “don’t know” or “refused” for that item. The web based system will also have help buttons on each screen. When applicable, additional information (e.g., definition of a word) will be accessible by selecting the <Help> button.

4. Efforts to Identify Duplication

While existing evaluations offer clues about AFI impacts and varying program features, there has been no randomized evaluation of AFI or its distinctive program components. Although AFI grantees are required to maintain information on the characteristics and program outcomes of their IDA participants, such administrative data systems are not sufficient to support this evaluation, as outcome measures must be consistently measured between treatment and control cases. With respect to outcome measures, the only such opportunity that may present itself will be with respect to the IDA balances held by AFI participants. For all other outcome measures, AFI administrative data systems will not provide comparable data for control cases, who (by design) do not participate in the AFI program. Even for IDA balances, however, the account-level data may not be available administratively, as the financial institutions that administer the IDA accounts may not have obtained the necessary authorization from accountholders to disclose such information.

5. Involvement of Small Business Organizations

The 36-month follow-up survey will not involve small business organizations.

6. Consequences of Less Frequent Data Collection

The evaluation design calls for follow-up data to be collected. If no follow-up survey was to be conducted, impact estimates could not be obtained for the relevant outcome measures, as the necessary data would not be available for control cases. Such data would be limited to items such as covered earnings or benefit receipt (e.g., TANF and SNAP). The impact analysis would thus not include the basic outcomes relating to savings and asset purchases.

Not collecting the qualitative and quantitative information described throughout this statement would substantially diminish the evaluation's ability to meet the legislative evaluation requirements. Specifically, it would prohibit measurement of the impact of AFI participation on key outcomes, such as savings and asset purchases. Accordingly, the information the study produces would be less relevant to the policy and program decisions that must be made to support asset building and the economic self-sufficiency of low-income families.

7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

8. Federal Register Notice and Consultation

In accordance with the Paperwork Reduction Act of 1995, the Administration for Children and Families (ACF) at the Department of Health and Human Services published a notice in the *Federal Register* on June 10, 2015, page 32957. The document number is FR Doc. 2015-14117. The notice provided a 60-day period for public comments, and comments were due by August 11, 2015. A copy of the notice is shown in Attachment J. ACF did not receive any substantive comments on the instruments or the proposed data collection.

The 36-month follow-up survey instrument is the same as the 12-month follow-up survey, which was developed under contract to the ACF/HHS by the Urban Institute and its subcontractor, RTI International. The 36-month follow-up survey has been updated to reflect the change in time period, but otherwise the survey remains the same. Both organizations have been instrumental in the major previous IDA evaluation efforts. Under prior contract with ACF/HHS in 2009-2010, the Urban Institute was responsible for the development of design options for this ongoing phase of AFI evaluation research. During 2008-2009 under the foundation-supported American Dream Demonstration (ADD), RTI International implemented the 10th-year follow-up survey at the experimental IDA site in Tulsa, Oklahoma. While at Abt Associates, the Urban Institute's current project director (Gregory Mills) led the four-year impact study of the ADD Tulsa site, as well as the first-phase non-experimental AFI evaluation.

The following list of consultants advised the Urban Institute on its development of design options for the current AFI evaluation: Kameri Christy-McMullin, William Gale, David Greenberg, David Kaufmann, Edmund Khashadourian, Kilolo Kijakazi, Alana Landey, Gretchen Lehman, Benita Melton, Gregory Mills, Zach Oberfield, Robert Plotnick, Ida Rademacher, Thomas Shapiro, Trina Williams Shanks, John Tambornino, and Beadsie Woo.

There are no unresolved issues resulting from these consultations.

9. **Tokens of Appreciation for Respondents**

Our study plan includes a token of thanks for completing the follow-up survey. Upon completion of the 12-month follow up survey, respondents were provided with \$40 as a token of appreciation (as approved by OMB). For the 36-month follow-up survey, study participants may be less interested in responding to a telephone survey. The survey collects a significant amount of detailed financial information. Respondents provided this information as part of entering the AFI program; however, three years later, they may view doing so as burdensome. This may be especially true of control subjects who are not vested in the program. Thus, to prevent differential nonresponse between treatment and control groups, ACF recommends initially offering respondents \$50 as a token of appreciation in order to improve cooperation at follow-up. After two weeks, ACF will reduce this amount to \$40 for those who complete the survey within one month. For those who still have not responded to the survey one month after their anniversary date, ACF will offer an increased amount of \$50 to a subsample of non-respondents. This differential payment structure has proven effective at increasing response rates for long-term follow-up studies. Estimates of program impacts may be biased if the respondents in each group are not comparable due to differential group nonresponse.

Many surveys are designed to offer incentives of varying types with the goal of increasing survey response. Monetary incentives at one or more phases of data collection have become fairly common, including some federally-sponsored surveys. Examples include the National Survey on Drug Use and Health (NSDUH, *Substance Abuse and Mental Health Services Administration*), the National Survey of Family Growth (NSFG, *National Center for Health Statistics*), the National Health and Nutrition Examination Survey (NHANES, *National Center for Health Statistics*), the National Survey of Child and Adolescent Well-Being (NSCAW, *Administration for Children and Families*), and the Early Childhood Longitudinal Study-Birth Cohort (ECLS-B, *U.S. Department of Education*).

Incentives of the type described above (i.e., with a higher amount paid to those who meet an early response deadline) have been used in many federally funded longitudinal studies; they encourage early survey responses and reduce contact attempts. These incentives will be offered to all AFI participants. Prior research has shown early bird incentives to be effective in getting respondents to complete sooner and at a higher rate. Ward et al. (2014) found that early bird incentives markedly increased the rate of completions within the first two weeks of survey administration ($p < 0.05$). Increasing the response rate in the early weeks of the AFI follow-up survey will result in respondents completing closer to their anniversary date, a higher proportion of online interviews, and fewer resource-intensive interviewer administered telephone or field interviews. A higher rate of completes in the early weeks of survey administration will enable the survey research staff to focus resources on respondents who are the most difficult to convert. The research team has successfully used the early bird incentive strategy in an effort to reduce nonresponse and cost for several studies, including the Beginning Postsecondary Students Longitudinal Study (BPS), the National Postsecondary Student Aid Study, and the Baccalaureate and Beyond Longitudinal Study field tests.

In addition to the incentive for completing the survey, the study team plans to use tokens of appreciation to encourage study participants to send in updated contact information. Respondents can update their contact information by calling a toll-free number or by completing and returning an enclosed contact information update sheet. In order to encourage response to this mailing, the study team will include a \$5 cash incentive in the mailing. Studies show that prepaid tokens of appreciation are effective, and that they work better than promised tokens (National Youth in Transition Database 2010; Singer 2012). Even small prepaid tokens can have a meaningful influence on response rates. For example, one study found that a \$1 prepaid token of appreciation yielded a response rate of 71 percent while a \$50 promised token yielded a response rate of 57 percent (James 1992). More recent studies show that prepaid tokens have been demonstrated to increase response rates by 8 to 31 percent compared with no tokens (Dillman 2009), and that a \$5 prepaid token increased the response rate by 14 percent overall, and by 42 percent within the first week of survey administration (LeClere 2012). Nominal panel maintenance tokens of appreciation have been approved on many federally funded longitudinal studies to reduce attrition and minimize the number of contact attempts. Given the length of time between random assignment and the 36-month follow-up, it is critical that the research team have as up-to-date contact information for sample members as is possible.

10. Privacy of Respondents

Concern for the privacy and protection of respondents' rights is a central part in the implementation of the AFI Evaluation and will be given the utmost emphasis. The information requested under this collection will be private in a manner consistent with 42 U.S.C. 1306, 20 CFR 401 and 402, 5 U.S.C.552 (Freedom of Information Act), 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130. (Attachment A: Notice of approval of Federal-Wide Assurance, submitted by RTI to the Office for Human Research Protections (OHRP), DHHS in compliance with the requirements for the protection of human subjects (45 CFR 46)).

As with the previously approved information collections for this evaluation, the follow-up questionnaire uses techniques to afford privacy for the respondent during the interview process. The computer-assisted self-interviewing (CASI) portion of the instrument will maximize privacy by giving control of the sensitive questionnaire sections directly to the respondent. The CASI methodology allows the respondent to key his or her own responses into the computer via the keyboard.

With the CASI methodology, all data are entered privately by the respondent and completed interview data are electronically stored automatically on the Contractor's secured servers. Respondents or interviewers are unable to review or to edit questionnaire data as the completed interview files are locked. On the data file, respondents are identified only by a link number assigned to data files and questionnaires/interviews. Although the link number is associated with respondent information, this location information is deleted by the Contractor before the delivery of data to ACF. The contact information, which is maintained in a separate file for Contractor use in sampling and analysis, is purged at the completion of data processing.

Although the respondent's first name, address, and phone number will be collected within the follow-up interview, it will be used only for re-contact purposes and retrieved in group batches based on date. Once the CASI data are stored on the contractor's server, the respondent's contact

information will be split off into a separate database with only the random number ID for linkage. The rest of the CASI data will be converted into a SAS data file format and merged onto the master data file.

The follow-up survey will be conducted over the telephone by telephone interviewers, in-person via field interviewers, and will be available as an online survey. All interviewers will receive training on the importance of keeping all information learned from respondents private. A confidentiality pledge will be read and signed by all interviewers during the project training process (Attachment B).

There will be no Privacy Act System of Records established for this effort.

11. Sensitive Questions

As with the previously approved baseline and 12-month follow up surveys, the Social Engagement and Outlook Section of the AFI 36 month follow up questionnaire includes questions about physical and emotional health that some respondents may consider sensitive. The follow-up interview will be conducted by telephone interviewers and field interviewers trained in administering the AFI survey, as well as through an online platform. Telephone interviewers will administer the questionnaire over the telephone from a secure call center facility. When calling to conduct the AFI survey, the interviewer will ask the respondent to go to a private location for the duration of the interview. The interviewer will repeat the privacy assurances and note the respondent's answers into the computer.

12. Estimation of Information Collection Burden

Approximately 800 AFI-eligible study participants will complete a 60-minute telephone-administered or web-based follow-up survey approximately 36 months after random assignment.

The estimated annual burden (based on a three-year study duration) is 271 hours. See the table below for estimated annual burden for the 36-month follow-up survey. All previously approved information collections will be complete prior to review of this request; therefore no burden for those ICs is included in this request

The annualized cost burden to respondents is based on the estimated burden hours and the assumed hourly wage rate for respondents. The assumed wage rate is the average hourly earnings for those in private, non-farm positions: \$ 23.24 (<http://www.dol.gov/dol/topic/statistics/index.htm>). The estimated annualized cost (based on a three-year study duration) is \$6,298.04.

Annualized Estimated Burden for AFI Evaluation

Instrument	Total Number of Respondents	Annual Number of Respondents	Number of Responses per Respondent	Average Burden Hours Per Response	Estimated Burden Hours	Hourly Wage Rate	Annualized Cost
AFI 36-Month Follow-up Questionnaire: AFI-eligible participants	814	271	1	1	271	\$23.24	\$6,298
Total					271		\$6,298

13. Additional Cost Burden to Respondents and Record Keepers

There are no additional costs beyond those outlined in A.12 above.

14. Estimate of Cost to the Federal Government

ACF is funding the costs of the study. The annualized costs to the Federal Government of 36-month follow up data collection is \$393,442. This includes direct and indirect costs of information collection.

15. Change in Burden

This is an additional information collection request under OMB # 0970-0414.

16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Plans for the AFI Evaluation involve a final report deliverable and several dissemination activities. The final report will include details on the design of the experiment, evaluation methodology, and 36-month impact findings from data analyses. Dissemination activities will include producing one or several policy briefs or one-page fact sheets could highlight some of the findings in the final report to reach policymakers, practitioners, advocates, and researchers.

AFI Program Evaluation Schedule

Informed consent and baseline data collection:	Completed
Implementation study data collection:	Completed
Locating materials mailed:	Ongoing
12-month follow-up data collection:	Will be completed September 2015
36-month follow-up data collection:	Winter 2016 – Summer 2017 (Pending OMB approval)
Data analysis:	Fall 2017 – Spring 2019
Final report issued:	Spring 2019

17. Reasons Not to Display OMB Expiration Date

The OMB expiration date will be displayed on all AFI evaluation data collection materials.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

This submission describing data collection requests no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9).