Date:	May 11, 2016
Request:	The Health Resources and Services Administration's (HRSA) Maternal and Child Health Bureau (MCHB) requests changes to the Preconception, Pregnancy and Parenting (3Ps) Information Form (OMB #: 0915-0338, Expiration Date: 6/30/2017).
Purpose:	The purpose of these changes is to: 1) reduce the burden on Healthy Start grantees and participants; 2) enhance the 3Ps form to ensure collected data is meaningful for monitoring and evaluation, as well as screening and care coordination; and 3) streamline previously separate data systems.
	We are proposing to reformat the questions from one (1) form to six (6) forms called screening tools. This will allow questions to be administered in accordance with the participant's enrollment/service delivery status and perinatal period. The previous 3Ps format did not allow the administration of questions to be tailored in this manner. Healthy Start grantees essentially had to ask all questions of participants annually even if the questions did not apply to the participants at that time (e.g., asking postpartum questions when a woman had not yet delivered a baby). By reformatting the questions into six (6) screening tools, Healthy Start grantees can more easily administer questions that are appropriate for the participant and her stage of enrollment and pregnancy status. This reduces the burden on the Healthy Start grantees collecting and entering the data, and burden on participants because they will no longer need to answer questions not applicable them. In addition to reformatting the 3Ps Form, we have proposed deleting questions that are neither critical for evaluation nor programmatic purposes.
	We are also proposing to add questions to the 3Ps Form. The additional questions will allow the 3Ps Form to be used as an all-inclusive data collection instrument for MCHB and Healthy Start grantees. The additional questions extend and refine previously approved content, allowing for the collection of more granular and/or in-depth information on existing topics. Adding these questions allows Healthy Start grantees to better assess risk, identify needed services, provide appropriate follow-up activities to program participants, and improve overall service delivery and quality.
	Finally, the addition of screening and care coordination questions aligns the 3Ps Form with the grantees' local data collection systems. The intent of the 3Ps Form was to create a uniform data collection instrument to standardize key program data elements and support assessments of program performance and evaluation. The reformatted 3Ps Form increases uniformity and standardization across the program because Healthy Start grantees will no longer have to collect data separately for their own administrative systems and Federal program reporting/evaluation functions, unless they choose to. The reformatted 3Ps Form allows for more streamlined data collection systems at the local and Federal levels, decreases redundancies in data collection efforts, improves the

quality of information collected, and ensures sustainability of a long-term, standardized data collection system.

Time Sensitivity:Data collection for the Healthy Start program is scheduled to begin on October1, 2016 in conjunction with the launch of the Healthy Start Monitoring and
Evaluation Database (HSMED). If approved, the DHSPS must notify Healthy Start
grantees of data collection changes in August 2016.

PROPOSED CHANGES TO THE PRECONCEPTION, PREGNANCY AND PARENTING (3PS) INFORMATION FORM

As noted above, the 3Ps Form was reformatted to allow questions to be administered in accordance with the participant's enrollment/service delivery status and perinatal period. We are also proposing to add questions to better monitor referrals, services, and follow-up activities provided to program participants and align the 3Ps Form with the Healthy Start grantees' local data collection systems; as well as proposing to remove questions because they are not critical for evaluation or programmatic purposes.

In the attached Excel file, *Reformatted 3Ps Crosswalk*, you will find the following:

- A list of questions from the original 3Ps form that were kept and their new location in the reformatted 3Ps screening tools;
- A list of new questions added to the reformatted forms and the specific justification for adding the questions;
- A list of questions that were removed from the original 3Ps form and the specific justification for removing the questions; and
- A list of questions revised in the reformatted 3Ps screening tools and the specific justification for the revisions.

In summary:

- 48 3Ps questions were kept without change;
- 50 new questions were added to the reformatted 3Ps/screening tools (these are questions that were not previously on the 3Ps);
- 44 3Ps questions were removed and are not reflected in the reformatted 3Ps/screening tools; and
- 64 3Ps questions were revised for inclusion in the reformatted 3Ps/screening tools.

For your reference, we are also attaching the original approved 3Ps form and the reformatted 3Ps form/six (6) screening tools.

ESTIMATES OF RESPONDENTS AND ANNUALIZED HOUR BURDEN

The overall number of respondents and annualized hour burden for OMB Clearance #: 0915-0338 was estimated to be 41,183 and 20,953, respectively (please see Table 1 below). Of that burden, the original 3Ps form number of respondents and estimate of annualized hour burden was 40,675 and 20,338, respectively (please see highlighted row in Table 1 below). The revised overall number of respondents and estimate of annualized hour burden for OMB Clearance #: 0915-0338 is 163,206 and 177,007

respectively (please see Table 2 below). Of that burden, the reformatted 3Ps form number of respondents and estimate of annualized hour burden is 162,698 and 176,392 (please see highlighted rows in Table 2 below). While this represents an increase in number of respondents and annualized hour burden because of the increase in the number of forms, it reduces the burden to individual participants that will not need to respond to all the questions. Four of the six reformatted forms are only for participants that become pregnant while in the program. It is estimated that approximately half of all Healthy Start participants are/will be pregnant women.

Form Name	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Preconception, Pregnancy, and Parenting Information (3P's) Form	40,675	1	0.50	20,338
National Healthy Start Program Web Survey	88	1	2.00	176
CAN member Web Survey	225	1	0.75	169
Healthy Start Site Visit Protocol	15	1	6.00	90
Healthy Start Participant Focus Group Protocol	180	1	1.00	180
Total	41,183			20,953

Table 2: Estimates of Annualized Hour Burden for the Reformatted 3Ps Form/Screening Tools

Form Name	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Demographic Intake Form	40,675	1	15/60 (0.25)	10,169
Pregnancy Status/History	40,675	1	25/60 (0.42)	17,084
Preconception	20,337	1	90/60 (1.5)	30,506
Prenatal	20,337	1	120/60 (2.00)	40,674
Postpartum	20,337	1	110/60 (1.8)	37,285
Interconception/ Parenting	20,337	1	120/60 (2.00)	40,674
National Healthy Start Program	88	1	2.00	176

Web Survey				
CAN member	225	1	0.75	169
Web Survey	223	L 1	0.75	107
Healthy Start Site	15	1	6.00	00
Visit Protocol	15	L 1	0.00	90
Healthy Start				
Participant Focus	180	1	1.00	180
Group Protocol				
Total	163,206			177,007

Attachments:

- Reformatted 3Ps Crosswalk
- Original 3Ps Form
- Reformatted 3Ps Form/6 Screening Tools
 - 1. Demographic Intake Form
 - 2. Pregnancy Status/History
 - 3. Preconception
 - 4. Prenatal
 - 5. Postpartum
 - 6. Interconception/Parenting