Supporting Statement A 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

Contact Person: Tara Rice

February 08, 2017

Contents

A.	Justif	ication	4
	1.	Circumstances Making the Collection of Information Necessary	4
	2.	Purpose and Use of Information Collection	5
	3.	Use of Improved Information Technology and Burden Reduction	7
	4.	Efforts to Identify Duplication and Use of Similar Information	7
	5.	Impact on Small Businesses or Other Small Entities	7
	6.	Consequences of Not Collecting the Information/Collecting Less Frequently	7
	7.	Special Circumstances Relating to the Guidelines of 5 CFR 1320.5	8
	8.	Comments in Response to the Federal Register Notice/Outside Consultation	8
	9.	Explanation of Any Payment/Gifts to Respondents	9
	10.	Assurance of Confidentiality Provided to Respondents	9
	11.	Justification for Sensitive Questions.	9
	12.	Estimates of Annualized Hour and Cost Burden	11
		A.12A Estimated Annualized Burden Hours	11
		A.12B Estimated Annualized Cost to Respondents	12
	13.	Estimate of Other Total Annual Cost Burden to Respondents or Recordkeepers/Capit Costs	
	14.	Annualized Cost to Federal Government	13
	15.	Explanation for Program Changes or Adjustments	13
	16.	Plans for Tabulation and Publication and Project Time Schedule	13
	17.	Display of Expiration Date for OMB Approval	13
	18.	Exceptions to Certification Statement	13

Exhibits

Exhibit	1–PAF Performance Data Requirements Based on Implementation Category6				
Exhibit	2–Outside Consultation8				
Exhibit	3–Estimated Annualized Burden Hours12				
Exhibit	4–Estimated Annualized Cost to Respondents for Information Collection				
	Attachments				
A.	Authorizing Legislation				
B. PAF Performance Measures: Grantee-organization level Elements (All Grantees)					
C.	C. PAF Performance Measures: Category 1 Elements				
D.	PAF Performance Measures: Category 2 Elements				
E.	PAF Performance Measures: Category 3 Elements				
F.	PAF Performance Measures: Category 4 Elements				

G. 60-day Federal Register Notice

H. Performance Data System (PDS) Screenshots

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

The Office of Adolescent Health (OAH) is requesting an extension through March 31, 2018 of the OMB # 0990-0416 "Office of Adolescent Health Annual Pregnancy Assistance Fund Performance Measure Collection," currently approved through March 31, 2017. One addition to the data collection is that three grantees have been added to the program, increasing the number of grantees reporting on the measures from 17 to 20. The only changes to the data that will be collected are the addition of one question (regarding the number of partners that grantees have lost in the past year), and change in how the regarding the number of participants reached question is aggregated, such that it is now aggregated separately for each implementation category, instead of once across the whole grant program. More detailed information is provided below.

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Pregnancy Assistance Fund (PAF) is a competitive grant program authorized by the Affordable Care Act (ACA) (Public Law 111-148) and administered by OAH. The Act appropriates \$25 million for each of fiscal years 2010 through 2019. The performance measure collection is important to OAH because it provides 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 funding requirements 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 July 2013, OAH awarded 4-year PAF grants to 17 states and tribes (Cohort 2), and in July 2015, OAH awarded 5-year grants to three additional states. This request for OMB approval is for (1) a 12-month extension of the PAF performance measures data collection for the Cohort 2 grantees, and (2) the addition of data collection for the three new grantees.

Attachment A to this statement contains a copy of the authorizing legislation that supports the collection of PAF performance data. **Attachments B-F** show the forms with the performance

measures; **Attachment B** shows the grantee-organization level measures (collected by all grantees), **Attachment C** shows the measures for category 1 grantees, **Attachment D** shows the form for category 2 performance measures, **Attachment E** shows the category 3 performance measures, and **Attachment F** shows the category 4 performance measures. **Attachment G** is a copy of the *60–day Federal Register Notice*. **Attachment H shows Performance Data System (PDS) screen shots**.

2. Purpose and Use of Information Collection

Collection of annual performance data benefits PAF grantees by allowing PAF administrators to monitor programs and conduct continuous quality improvement of their individual projects. Collection of annual data allows PAF administrators to assess whether the eligible institutions funded by the PAF sub-awards are serving expectant and parenting teens, fathers, students, women, and their children as intended. Annual data collection also allows PAF grantees to assess the performance of subawardees in linking program participants to services such as educational supports, health care, and child care.

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, 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=20)	Participant Characteristics (16 measures)
	-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=3):	Participant Characteristics & Outcomes (5 measures)
Implementing activities to support	-Participant by type (e.g., expectant teen [<20 years], parenting woman [>19 years])
expectant and parenting student services at institutions of higher	-Expectant or parenting IHE students by type of IHE in which they are enrolled
education (IHE)	- Expectant or parenting IHE students that graduate
(ii i i i i i i i i i i i i i i i i i i	- 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=18): Implementing activities to support expectant and parenting teens at high schools (HS) and community service centers (CSC)	Participant Characteristics & Outcomes (7 measures) -Participant by type (e.g., expectant teen [<20 years], parenting woman [>19 years]) - 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 (3 measures) -Participant by type (e.g., expectant teen [<20 years], parenting woman [>19 years]) -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=14): Implementing public awareness and education activities	Outputs (1 measure) -Types of public awareness campaigns implemented		

3. <u>Use of Improved Information Technology and Burden Reduction</u>

OAH utilizes electronic technology to reduce the burden of PAF reporting. All PAF grantees report aggregate performance data into a web-based reporting system (*PAF Performance Data System [PDS]*) that conforms to all HHS requirements and guidance for security, accessibility, and usability. The system has several features that reduce the burden for grantees and OAH staff alike. For example, the website uses 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 simplifies reporting and eliminates 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. Additionally, OAH provides user-friendly system documentation, dictionary of terms, training webinars, and e-mail access to a helpdesk.

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. No duplicate data exists in the form needed by OAH to administer and monitor more effectively the PAF program and individual grants. Most of the measures are already being collected by grantees as part of their routine administrative records (e.g., services provided, numbers of participants served, demographics of participants served).

5. <u>Impact on Small Businesses or Other Small Entities</u>

No small businesses will be involved in this study.

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

OAH uses 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 enhances OAH's ability to monitor the PAF program and allows PAF grantees to track their progress toward program goals.

Annually, PAF grantees report performance data to OAH within three months (by October 30) of the end of the reporting period (July 31). GPRA requires that government agencies report on their performance measures annually. In addition, collecting PAF performance data less frequently than annually would 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. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

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

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

Federal Register Notice Comments. A 60-day Federal Register Notice was originally published in the Federal Register on 12/09/2016, in Volume 81, Number 237, pages 89118-89119 (see Attachment G). No public comments were received.

Outside Consultation. OAH originally consulted with staff from the Centers for Disease Control and Prevention and RTI International about the PAF performance measures data collection. RTI was the contractor responsible for assisting OAH with evaluation of the first cohort of PAF grantees. **Exhibit 2** presents the name, affiliation, and contact information for individuals who provided consultation on the proposed collection. There are no new or additional contractors who have been consulted regarding PAF performance measures data collection.

Exhibit 2-Outside Consultation

Year	Name/Title/Affiliation	Contact Information
2012–13	Barri Burrus, PhD, <i>RTI Project Director</i> RTI International	Phone: 919-597-5109 E-mail: <u>burrus@rti.org</u>
2012–13	Christina Fowler, PhD, <i>Task 3/Performance Measures Lead</i> RTI International	Phone: 919-316-3447 E-mail: <u>cfowler@rti.org</u>
2012–13	Lorrie Gavin, PhD, <i>Scientist</i> CDC Division of Reproductive Health	Phone: 770-488-6284 E-mail: lcg6@cdc.gov
2012–13	Kathleen Krieger, MPH, <i>RTI Project Coordinator/Analyst</i> RTI International	Phone: 919-541-6175 E-mail: <u>kkrieger@rti.org</u>
2012–13	Ellen K. Wilson, PhD, <i>RTI Associate Project Director</i> 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, but data will be kept private to the extent allowable by law. PAF grantees (state and tribal entities) will report PAF performance data to OAH as aggregate totals; no individual participant can be identified based on the reported data. No personal identifiers will be used in the reporting of any data.

Individual users designated by the PAF grantees will be assigned user names and passwords that will grant them access to the project website. There, users will have the opportunity to provide data that will be stored in a secure Microsoft SQL Server database utilizing a relational table structure, facilitating expedient data retrieval and analysis. The database server, located at RTI, will be accessible only to the staff assigned to this project. Electronic communications will occur via a secure Internet connection. All transmissions will be encrypted through secure socket layers (SSL) and verified by an SSL Certificate authority.

11. <u>Justification for Sensitive Questions</u>

The primary objectives of the Pregnancy Assistance Fund grant program are to provide supportive services to expectant and parenting teens, students, women, fathers, and their families at eligible institutions of higher education, high schools or community service centers, and to provide supportive services, including case management and referrals, to pregnant women who experience intimate partner violence, sexual assault, or stalking. Thus, the data collection includes some potentially sensitive questions related to the pregnancy status of participants, living arrangement of participants, and co-parenting status. In addition, the data collection includes race and ethnicity of participants. It is anticipated that all of these measures would be tracked by PAF-funded sites as part of their administrative client records. Grantees may also inform individual participants that they may refuse to answer any question during intake.

The specific questions that are potentially sensitive from the Grantee-level form:

- 3. What is the ethnicity of expectant and parenting participants? Indicate the total number in each category below.
 - a) Hispanic or Latino
 - b) Not Hispanic or Latino
 - c) Unknown or not reported
- 4. What is the race of expectant and parenting participants? Indicate the total number in each category below. (*Grantees are instructed to allow participants to specify which race*(*s*) *they identify with; grantees would report more than one race to OAH*).
 - a) Asian
 - b) Black or African American
 - c) American Indian or Alaska Native

- d) Native Hawaiian or Other Pacific Islander
- e) White
- f) More than one race
- g) Unknown or not reported
- 5. What is the current relationship status of expectant and parenting participants?
 - a) Married
 - b) Not married (never married, divorced, separated, or widowed) but living with a boyfriend/girlfriend/partner (cohabiting)
 - c) Neither married nor cohabiting
 - d) Missing/not reported

- 6. What is the current living arrangement of expectant and parenting participant? Indicate the total number in each category below.
 - a) Lives alone or with child/children
 - b) Lives with spouse/partner
 - c) Lives with parent(s)
 - d) Lives with spouse's/partner's parent(s) or other related adult(s)
 - e) Lives with other unrelated adult(s)
 - f) Lives in foster or group home
 - g) Homeless/no permanent residence
 - h) Other
 - i) Missing/not reported
- 7. How many expectant or parenting female participants received any financial or social support for themselves or their (youngest) child from the child's father in the last 4 weeks? Indicate the total number in each category below.
 - a) Financial support (examples include giving the teen or woman money, child support payments, buying clothes, diapers or other supplies for the baby, paying for doctors' visits?)
 - b) Social support (examples include assisting with child care, going to doctor's visits, helping with chores, assisting with transportation)
- 8. How many expectant and parenting male participants provided financial or social support for their (youngest) child or the child's mother in the last 4 weeks? Indicate the total number in each category below.

- a) Financial support (examples include giving the teen or woman money, child support payments, buying clothes, diapers or other supplies for the baby, paying for doctors' visits?)
- b) Social support (examples include assisting with child care, going to doctor's visits, helping with chores, assisting with transportation)

Potentially Sensitive Item From the Category 1 and Category 2 forms:

How many parenting IHE student participants 19 years and younger reported a new pregnancy during the program year?

Although the PAF performance data contains data items as listed above of a potentially sensitive nature (e.g., participant race/ethnicity, incidence of repeat pregnancy, relationship status, living arrangement), individual respondents cannot be identified in the data because grantees will report only aggregate data to OAH. No personal identifiers will be collected as part of this information collection request. Participants are also informed of the measures taken to protect the privacy of their responses.

All topics covered in this ICR align with the PAF grant program's goals of providing case management and supportive social services to expectant and parenting teens, women, fathers, and their families, as stated in the funding announcement. These data items will help individual grantees monitor the performance of their individual PAF programs for continuous quality improvement. The PAF legislation specifies that grantees who are implementing services at Institutions of Higher Education, High Schools or Community Service Organizations should annually assess whether each institution meets the needs of the expectant and parenting students enrolled at the institution related to maternity coverage, family housing, child care, flexible academic scheduling, parenting skills, post-partum counseling. In addition, the collection will help the OAH monitor individual grantee performance and provide overall program management and technical assistance to grantees.

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 **584** hours, or an average of **29.2** hours per respondent; the respondent is the individual grantee. OAH originally awarded 17 grants for a four-year project period beginning July, 2013. Three new grantees were funded beginning in July 2015 for a total of 20 grantees going who will need to report data in October 2017 (see Exhibit 2). The burden estimates include the time spent by grantee staff to retrieve, compile, record, and verify the performance data.

Grantees will be collecting all of the data required for the performance measures as part of their administrative record-keeping, so the only additional burden to grantees for reporting the performance measures is the time it takes them to assemble the necessary data and enter it into the reporting forms. Grantees can either enter the data directly into the system using a point and click method, or submit spreadsheets.

The annualized average burden estimate accounts for differences in the number of required measures across grantees. As shown in **Exhibit 3**, 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.

Exhibit 3-Total Estimated Annualized Burden Hours

Form	Type of Respondent	Number of Respondents	Number of Responses per Respondent	Average Burden Hours per Respondent	Total Burden Hours
Measures for all grantees (17 measures)	All Grantees (Program Staff)	20	1	19	380
Category 1 Measures (5 measures)	Category 1 Grantees: Implementing activities to support pregnant and parenting student services at institutions of higher education	3	1	6	18
Category 2 Measures (6 measures)	Category 2 Grantees: Implementing activities to support pregnant and parenting teens at high schools and community service centers	18	1	9	162
Category 3 Measures (3 measures)	Category 3 Grantees: Implementing activities to improve services for pregnant women who are victims of domestic violence, sexual violence, sexual assault, and stalking;	5	1	3	15
Category 4 Measures (1 measure)	Category 4 Grantees: Implementing public awareness and education activities	9	1	1	9
	Total	55	_	_	584

A.12B Estimated Annualized Cost to Respondents

Based on an average wage rate of \$40 per hour, the estimated annualized labor cost to report the PAF performance data is **\$23,360**, or an average of **\$1,168** per grantee respondent (see **Exhibit 4**).

Exhibit 4-Estimated Annualized Cost to Respondents for Information Collection

Type of Respondent	Total Burden Hours	Average (Weighted) Hourly Wage Rate	Total Respondent Cost	
Grantees	584	\$40	\$23,360	

13. <u>Estimate of Other Total Annual Cost Burden to Respondents or Record</u> keepers/Capital Costs

There are no non-labor 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 maintain the PDS and provide training and technical assistance to grantee staff and approximately \$2000 per year for federal staff. .

15. Explanation for Program Changes or Adjustments

This is a 12-month extension to the data collection for the PAF Cohort 2. The one program change is that three new grantees have been funded, bringing the total number of grantees to 20.

16. Plans for Tabulation and Publication and Project Time Schedule

PAF grantees will continue to collect performance measures data during FY 2017 and report to OAH by October 30, 2017. RTI, the contractor for the OAH performance measures, will then analyze the data and prepare a written report, summarizing findings across all grantees. Data will be broken down by implementation category (i.e., Category 1, Category 2, etc.). Participant characteristics will also be analyzed according to key characteristics (e.g., race/ethnicity, age). All data will be compiled into a final summary report to be published on the OAH website.

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.

Attachments

- A. Authorizing Legislation
- B. PAF Performance Measures: Grantee-organization level
- C. PAF Performance Measures: Category 1 Elements

- D. PAF Performance Measures: Category 2 Elements
- E. PAF Performance Measures: Category 3 Elements
- F. PAF Performance Measures: Category 4 Elements
- G. 60-day Federal Register Notice
- H. Performance Data System (PDS) Screenshots