

**Supporting Statement A for Justification for the OMB Clearance of the
Office of Adolescent Health
*Pregnancy Assistance Fund (PAF) Performance Data Collection, FY2017-
FY2018***

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

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A. Justification for the Collection of Information

Background

This is a revised request for the Office of Management and Budget (OMB) approval for a new annual collection of performance data from Pregnancy Assistance Fund (PAF) grantees funded from FY 2017-FY2018. PAF is a competitive grant program authorized by the Affordable Care Act (ACA) (Public Law 111-148) and administered by the Office of Adolescent Health (OAH). The Act appropriates \$25 million for each of fiscal years 2010 through 2019.

PAF grants are awarded to States and Tribes so that they may provide expectant and parenting teens, women, and fathers, and their families, 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. PAF grantees may use funds to carry out activities to (1) Support expectant and parenting students at institutions of higher education (IHE); (2) Support expectant and parenting teens and young adults 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 expectant and parenting teens and women.

In September 2010, OAH awarded the first 3-year PAF grants to 17 entities (“cohort 1”). Each grantee in the first PAF cohort was required to identify performance measures for their project and report data in their Progress Reports. Thus, during cohort 1, OAH did not collect uniform performance data from its PAF grantees, limiting OAH’s ability to report on the performance of the grant program as a whole. Based on the experience from the first PAF cohort, OAH developed a uniform set of performance measures and required all PAF grantees in the second cohort to collect and report data annually to OAH using an online database (OMB #0990-0416, expiration 5/31/2018). In August 2013, OAH awarded 4-year grants to the second cohort of 17 state agencies and tribal entities. In August 2015, OAH awarded 5 year grants to 3 states.

The newest PAF Funding Opportunity Announcement (FOA), released in December 2016, emphasized scaling up the PAF strategy to support expectant and parenting teens, young adults, and their families in multiple sites and settings. OAH funded 16 State and Tribes for a 1-year period of performance (start date: July 1, 2017). In the initial submission, OAH had revised the uniform performance measures for the new PAF cohort to reflect the new FOA’s emphasis on scaling up the PAF strategy. In addition, based on the data collection experiences of the past 4 years, OAH removed some questions with poor response rates from the current cohort and rephrased a few questions to improve the quality of data collected.

In July, HHS decided to reduce the funding period for a single year. In light of the HHS's decision in July to truncate the funding period to 1 year instead of 3 years, OAH is further streamlining the uniform measures for PAF grantees. As grantees only have a single year of implementation, scaling up to multiple sites and settings will no longer be feasible for all grantees. Thus, OAH is reducing the required number of measures by eliminating the birth outcomes, educational attainment, and self-sufficiency items.

This supporting statement requests approval for the collection of the new performance measure data from the FY2017-FY2018 cohort of PAF grantees. Please note that a renewal Information Collection Request was submitted on 12/08/2016 to cover the final data collection in October 2017 for cohort 2 PAF grantees (OMB # 0990-0416 Office of Adolescent Health Pregnancy Assistance Fund (PAF) Performance Measure Collection", Expiration May 31, 2018). The request for approval of the new cohort's measures is a separate request, due to the new sample of grantees (new PAF cohort, FY2017-FY2018), revised questions, and updated burden.

1. Circumstances Making the Collection of Information Necessary

The performance measure collection is important to OAH because it will provide 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 performance measures data are a funding requirement for the grants, as stated in the funding opportunity announcement.

The performance measures data collection will fulfill several important functions for OAH. First, OAH expects its grantees to utilize the measures to make continuous quality improvement in their program implementation and inform their partners and stakeholders about implementation and sustainability progress. Second, performance measures provide OAH with metrics for monitoring PAF grantees so that project officers can provide technical assistance when needed. Finally, OAH uses the measures to report to stakeholders on the grantees' progress. Performance Measure data collection is a requirement of all PAF grant awards and is included in the funding announcements.

Exhibit 1 summarizes the performance data required of all grantees. The specific questions that grantees would answer to address these measures may be found in **Appendices B-I**.

Exhibit 1–PAF Uniform Performance Measures, FY2017-FY2018

Type of Respondent: All Grantees (N=19) ¹	(Total: questions)
Performance Data/Questions	
Training	(1 question) <ul style="list-style-type: none"> # of grantee or partner staff that received training/professional development
Partnerships and Sustainability²	(4 questions) <ul style="list-style-type: none"> # of program partners engaged, by sector # and type of program implementation sites # of Program Implementation Sites in urban, rural, or suburban settings # of subawardees planning continued implementation of core PAF services
Participant Reach and Demographics	(7 questions) <ul style="list-style-type: none"> # expectant/parenting participants served, by setting # of dependent children served # of extended family members served # of expectant/parenting participants served, by race # of expectant/parenting participants served, by ethnicity # of expectant/parenting participants served, by age # of expectant/parenting participants engaged with the PAF program at 3,6, or 9 months
Core Services for Participants³	(7 questions) <ul style="list-style-type: none"> # of expectant and parenting participants receiving health care services # of dependent children receiving health care services # of expectant & parenting participants receiving self-sufficiency/education services # of expectant and parenting participants receiving concrete supports # of expectant and parenting participants receiving other services & supports # of professionals serving survivors of intimate partner violence, stalking, or sexual assault who received training on serving expectant women # of expectant females experiencing violence who receive supportive social services, accompaniment, or intervention services

2. Purpose and Use of Information Collection

Collection of annual performance data will benefit grantees by assisting PAF administrators with ongoing program monitoring and continuous quality improvement of their individual projects. The collection of annual performance data will assist OAH in gathering uniform

¹ OAH has revised to reflect final awards are made in July 2017. The 3 PAF grantees funded from 2015-2018 are also included in the total.

² Partnership questions revised & expanded to reflect scale-up approach and capture sustainability, revisions based on items collected by OAH from Teen Pregnancy Prevention grantees (OMB # 0990-0438, Exp. 10/31/2018)

³ Services questions revised & expanded to reflect scale-up approach of the new FOA revisions based on items collected by OAH from TPP grantees

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.

The data collection activities will provide information to OAH leadership and program officers to help them to more effectively manage the PAF program. We anticipate that the aggregate data will be made available to HHS Departmental leadership, Congress, the Office of Management and Budget, and the general public to assess program performance. Use of these data is vital for ensuring on-going improvement of the PAF program and through dissemination efforts, broader understanding and support of programs designed to help expectant and parenting teens, young adults, and their families.

The performance measures data required of all grantees will enable OAH to describe the social and demographic characteristics (e.g., age, race, ethnicity) of PAF participants; summarize support services provided to participants (e.g., education, child care); describe the outputs (e.g., number of program staff that receive training, the number and type of organizational partners). Use of Improved Information Technology and Burden Reduction

OAH will use electronic technology to reduce the burden of PAF reporting. All PAF grantees will report aggregated performance data into a Web-based reporting system (PAF Performance Data System [PDS]) that will conform to all Department of Health and Human Services requirements and guidance for security, accessibility, and usability. Users will log into the PDS using unique usernames and passwords. Data collected from the PDS will be stored in a secure SQL Server 2008 R2 data base server and backed up nightly through automated processes. Access to the data will be limited to staff of OAH, staff from the contractor company managing the PDS, and grantee users. OAH staff and staff from the contractor will be able to access data across grantees; grantee users will only have access to data relevant to their individual grant. The servers hosting the website and database will be actively maintained and patched with the latest relevant security updates as identified by information technology staff. The PDS will produce a fully validated data set (aggregate and grantee-level) that is ready for tabulation and analysis by OAH staff. OAH will provide grantees with user-friendly system documentation, training webinars, and e-mail and phone access to a helpdesk.

Attachment J includes screenshots from the PDS used by current PAF grantees.

4. Efforts to Identify Duplication and Use of Similar Information

The proposed data collection is the only source of uniform data on the performance across the PAF grant program. No other source of data exists in the form needed by OAH to administer and monitor the PAF program and individual PAF grant programs. Most of the measures

include information that would be collected by grantees (and their implementing partners) as part of their routine administrative record-keeping (e.g., services provided to participants, number of participants, demographics of participants, staff trainings).

5. Impact on Small Businesses or Other Small Entities

No small businesses will be involved in this study.

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

OAH will use 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 will enhance OAH's ability to monitor the PAF program and allow grantees to track their progress toward project goals.

During the first PAF cohort, uniform performance data was not collected from PAF grantees; as a consequence of not collecting uniform performance data, OAH was unable to describe fully the scope and impact of the PAF grant program. OAH was not able to report to stakeholders how many expectant and parenting participants were served by the PAF program, or to fully describe what types of services were being provided across the program, or to report on the outcomes (educational attainment, birth outcomes) across the grant program. Furthermore, not collecting uniform data limits OAH's ability to use data to drive decision-making, such as provision of technical assistance to grantees.

Annually, PAF grantees will report PAF performance data within 3 months (by September 30) of the end of the reporting period (anticipated June 30). Collecting PAF performance measures 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. As the department has truncated the funding, this cohort will only report data once. OAH requests a 3 year clearance, as OAH anticipates funding a new cohort of PAF grantees in 2018.

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 published in the Federal Register on 02/01/2017, in Volume 82, Number 20, page 8941-8942 (**Attachment K**).

One public comment was received via email from jean publee jean public1@yahoo.com regarding this notice on 2/1/2017.

Public Comment: “ american tax dollars should be used for american citizens. not for green card holderrs and not for illegal immigrant. the money we are spendin gon this program goes up and up and up constantly and it is because obama made every illegal immigrant that sneaks into our country eligible for all kinds of benefits they should not have on american workers wallets.

its time to deport pregnant women who are not citizens of this country. its time to tell them to go to their own country and get help, not take monies from the wallets of america's hard workers. they have their own families to take care of and with the money they have left these days after paying for all these foreign leaches, they have not enough left to take care of their own families.

the situation has grown disgusting. deport all illegal imimgrans and those who are not american citizens should not get any care for pregnancy. they shoujdl go home to their own countries and look for aid. we are sapped out. we have been taken advantage of for too long and in too great amounts. shu tthe goddam door. this comment if ro the pubic record. please receipt. jean publee jean public1@yahoo.com”

Response: In the Federal Register Notice, OS specifically requested comments regarding four specific questions: (1) the necessity and utility of the proposed information collection for the proper performance of the agency's functions, (2) the accuracy of the estimated burden, (3) ways to enhance the quality, utility, and clarity of the information to be collected, and (4) the use of automated collection techniques or other forms of information technology to minimize the information collection burden. The comment received did not address any of the four questions.

Outside Consultation. During 2012-2013, OAH originally consulted with staff from the Centers for Disease Control and Prevention and RTI International about the PAF performance measures data collection. RTI is 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.

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: burrus@rti.org
2012–13	Christina Fowler, PhD, <i>Task 3/Performance Measures Lead</i> RTI International	Phone: 919-316-3447 E-mail: cfowler@rti.org
2012–13	Lorrie Gavin, PhD, <i>Scientist</i> Office of Population Affairs	Phone: 240-453-2826 E-mail: lorrie.gavin@hhs.org
2012–13	Kathleen Krieger, MPH, <i>RTI Project Coordinator/Analyst</i> RTI International	Phone: 919-541-6175 E-mail: kkrieger@rti.org
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. Grantees (state and tribal entities) will report PAF performance data as aggregate totals; no individual participant can be identified based on the reported data.

The Web-based reporting system has been designed to ensure the security of the data obtained. Electronic data are stored in a location within the RTI network that provides the appropriate level of security based on the sensitivity of the data. No personal identifiers will be used in the reporting of any data.

Individual users designated by the 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 statisticians and analysts 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. Justification for Sensitive Questions

The primary goals of the PAF program are to provide supportive services to expectant and parenting students, teens, young adults to improve educational attainment and self-sufficiency,

improve overall health of participants and their families, including dependent children. The programs provide case management and link expectant and parenting participants to a variety of core support services as needed, such as housing, education supports, health care, and child care. During the conduct of PAF program services, PAF grantees and their subawardees would already be collecting intake information of a potentially sensitive nature (such as participant race, ethnicity, educational attainment) in order to provide services and link participants to referrals appropriately. OAH expects that grantees would collect data on race/ethnicity in aggregate as part of their program records and service provision. (See Attachment B, List of Forms, for the specific items that grantees would report to OAH).

Grantees will report only aggregated (across the grant), de-identified data to OAH. Thus, individual program participants cannot be identified in the data received by OAH.

12. Estimated Annualized Burden Hours

The estimated annualized hour burden of responding to this information collection has been revised to be 437 hours is **hours**, or an average of **23 hours per respondent; the respondent is the individual grantee. OAH awarded 16 grants for a one-year project period beginning July 2017; in addition, the 3 PAF grantees funded from 2015 and 2018 will be included** (see **Exhibit 3**). The hour-burden estimates include the time spent by grantee staff to retrieve, compile, and verify the performance data from all implementation sites, and enter data into the online performance measures database. The estimates exclude any hour burden associated with customary and usual practices that the grantee would carry out in the absence of the PAF reporting requirement.

The annualized average burden estimate assumes that grantees and their program sites would already collect the required measures for administrative purposes, such as the participant reach and demographics (e.g., number of participants by age, race, gender, etc.), the number of partnerships, the number of staff trainings, and the number of participants that received core services (. In addition, grantees are expected have their own systems in place to track the data.

Grantee- Level Measures

These are measures that are to be completed at the grantee or sub-awardee level, which concern features of the project as a whole, rather than specific to the implementation of services to participants.

Training. Grantees will report on the number of project staff that receive training or professional development through the grant. We estimate that this will take each respondent approximately 0.25 hours to summarize and report this information.

Partners and Sustainability. Grantees or sub-awardees will report on measures of number and retention of partners. We estimate that it will take each respondent approximately 2.4 hours to summarize and report this information.

Program-Level Measures

These are measures that summarize facets of the delivery of the program services.

Reach and Demographics. These data indicate the number of participants, by different background factors, of the PAF program participants. We anticipate that it will take each respondent a total of 10.6 hours per year to summarize and report these data.

Core Services: Grantees will report on the number of referrals to services (such as healthcare, social supports, education) made by program staff on behalf of program participants. We estimate that it will take each grantee 9.72 hours per year to summarize and report these data.

Exhibit 3 – Estimated Annualized Burden Hours, Revised 8/2017

Forms	Type of Respondent	Number of Respondents (Anticipated)	Number of Responses per Respondent	Average Burden Hours per Respondent	Total Burden Hours
Training	All Grantees: Grantee Staff	19	1	15/60	5
Partnerships and Sustainability	All Grantees: Grantee Staff	19	1	144/60	45.6
Reach and Demographics	All Grantees: Grantee Staff	19	1	637/60	202
Core Services	All Grantees: Grantee Staff	19	1	583/60	184.6
Total	All Grantees: Grantee Staff	19	1	23	437

13. Estimated Annualized Cost to Respondents

Salaries of the grantee staff summarizing and reporting data will vary widely across grant projects. Based on an assumed average wage rate of \$40 per hour, the estimated annualized labor cost to report the PAF performance data is \$17,480 or an average of **\$920** per grantee respondent; there will be a total of no more than **19** grantee respondents (see **Exhibit 5**).

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	437	\$40	\$17,480

Estimate of Other Total Annual Cost Burden to Respondents or Record-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 update and maintain the PDS and provide training and technical assistance to grantee staff and approximately \$2000 per year for federal staff. These figures take into account OAH’s experience collecting and processing similar performance measures data for the Teen Pregnancy Prevention (TPP) grantees and the previous cohort of PAF grantees. The costs include the federal staff time associated with developing the performance measures, reviewing the annual data reports by PAF project officers and administrators and overseeing the work of the Performance Data System Contractor, the cost of refining and operating the Performance Data System and training the PAF grantees in its use.

15. Program Changes or Adjustments

This is a new data collection for the PAF cohort (FY2017-FY2018).

16. Plans for Tabulation and Publication and Project Time Schedule

OAH requests the maximum 3-year clearance for the PAF performance data collection to allow grantees to collect and report performance data for three annual reporting periods (July 1 to June 30). Grantees would be expected to report data to OAH within 1 month of the end of the reporting period (thus data anticipated to be submitted by September 30 of each year). The first data collection for the PAF cohort (FY2017-FY2018) would be anticipated to occur on September 30, 2018. OAH would publish aggregated data reports annually (summarizing data across all of the PAF grantees) on its webpage.

Although this cohort is only funded for 1 year, the legislation authorizes the PAF program through 2019; OAH anticipates funding a new cohort in 2018.

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.

List of Attachments:

Forms, Training
Forms, Partnerships and Sustainability
Forms, Reach and Demographics
Forms, Core Services