

Justification for the Collection of Program Implementation Design Information from Personal Responsibility Education Program (PREP) Grantees – Generic Clearance for Formative Data Collections for Policy Research

**OMB Information Collection Request
0970 - 0356**

Supporting Statement

Part A

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Submitted By:
Office of Planning, Research and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor Mary Switzer Building
330 C St, SW
Washington, D.C. 20201

Federal Project Officer:
Seth Chamberlain (COR)

Project Monitor:
Kathleen McCoy, Business Strategy Consultants

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval to request program implementation information from grantees funded through the Personal Responsibility Education Program (PREP) using an “Implementation design template” (Attachment 1). The template summarizes grantees’ planned programming of teen pregnancy prevention programs. This information will be used to strengthen the designs of local evaluations of the programs, will help us to maintain an overall rigorous research agenda, and will inform technical assistance. This information collection request (ICR) is submitted under the generic clearance for Formative Data Collections for Policy Research (0970-0356). Consistent with the goals of this generic clearance, the information collected through the template for which we are seeking clearance will help to: (1) inform the development of OPRE research on PREP programming, (2) maintain a research agenda that is rigorous and relevant, and (3) inform the provision of technical assistance. Grantees are not required to complete these templates, but they will be strongly encouraged to complete them.

Upon approval from the Office of Management and Budget (OMB), ACF will collect information from grantees through the Implementation Plan template that asks grantees to summarize key information about their implementation plans. This information is valuable in order to provide appropriate training and technical assistance. This current request is meant only for planning and development.

Study Background

PREP programs, which are sponsored by the Family and Youth Services Bureau (FYSB) within ACF, seek to reduce teen pregnancy and sexually transmitted infections (STIs) and prepare youth for adulthood. FYSB supports programs that exhibit evidence of effectiveness, innovative adaptations of evidence-based programs, and promising programs. FYSB awards PREP grants under four separate but related programs: (1) State PREP (SPREP), (2) Competitive PREP (CPREP), (3) Personal Responsibility Education Innovative Strategies Program (PREIS), (4) and Tribal PREP (TPREP). They encourage, and in some cases require, grantees to conduct evaluations to inform the field’s current efforts and future programming for youth risk behavior prevention. The Office of Planning, Research, and Evaluation (OPRE) within ACF partners with FYSB and PREP grantees to conduct research and evaluation.

Under this generic ICR, ACF seeks approval for a formative data collection instrument for PREP grantees, which will be employed during early planning activities. The information collected will help individual grantees strengthen their local evaluation design, help to maintain an overall rigorous research agenda, and inform technical assistance

Legal or Administrative Requirements that Necessitate the Collection

Section 215 of the Medicare Access and CHIP Reauthorization Act of 2015 mandates that the Secretary evaluate the programs and activities carried out with funds made available through PREP. To meet these requirements, FYSB and OPRE support many grantees as they conduct

local evaluations, and provide technical assistance. This formative data collection is being done at the discretion of the agency, to gather preliminary formative information.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach

The purpose of the information collection instrument submitted through this request is to strengthen local evaluation design, help us to maintain an overall rigorous research agenda, and inform technical assistance. Specifically, the information collected will help the federal government and contractor staff provide programmatic and evaluation feedback and technical assistance to grantees on their programs' implementation design and progress. For example, we will examine the grantees' implementation plan to identify any challenges, such as with recruitment or staffing, that may occur during implementation prior to programming beginning. This will allow us to identify proposed solutions prior to issues arising to help the grantee prepare to implement programs in a cohesive, strong fashion. This will help to improve program design and, in turn, will improve local evaluation design.

Universe of Data Collection Efforts

The information reported by the program staff will help clarify the implementation design and assist in the planning for the provision of relevant technical assistance, both for programmatic and evaluation related purposes. To achieve this, we propose collecting Implementation design templates from 13 grantees that applied to a FOA that required them to conduct a local evaluation, and from up to seven additional grantees for example, grantees with challenges in designing their programs.

Implementation design template (Attachment 1). This template will provide ACF with a structure to document the essential elements of the implementation design of the grantee's program to support clear documentation of their implementation plans and to reflect any changes or updates to the design since the application. This template will collect information on the following: schedule of program delivery; planned adaptations; research and evaluation plans; implementation site information; staff recruitment, retention and tracking plans; participant recruitment, retention and tracking strategies; fidelity monitoring; service referrals; partnerships; and timeline. The use of the structured template will allow ACF to provide effective programmatic technical assistance prior to the start of programming.

A3. Improved Information Technology to Reduce Burden

ACF will employ information technology as appropriate to reduce the burden of respondents. This data collection effort will make use of electronic templates for completion and electronic submission.

A4. Efforts to Identify Duplication

Grant applications provide some of this information, but this information is not updated on a regular basis. This template is the only way to get the most current, up-to-date information on the grantee's implementation plan that will allow us to gather the formative information from the ACF-funded PREP programs. No unnecessary information is being requested of program staff. None of the instruments will ask for information that can be reliably obtained through other sources.

A5. Involvement of Small Organizations

The potential exists for data collection activities to affect small entities associated with the grantee. For example, PREP grantees may conduct evaluations led by local evaluators affiliated with small organizations. Grantees may task the local evaluator with the collection of some or all of the data requested. Proposed data collection efforts are designed to minimize the burden on all organizations involved, including small businesses and entities, by collecting only critical information through the use of standardized templates.

A6. Consequences of Less Frequent Data Collection

The purpose of the information collection instrument included in this submission is described in Item A2, above. Not collecting information using this instrument would limit the government's ability to document the planning processes of its grantees and to provide the technical assistance needed.

Specifically, without the information collected through the implementation design template, the government would not be able to determine whether the proposed design will meet the grantee's program and research objectives as well as the standards for programming and evaluations as laid out in Funding Opportunity Announcements (FOAs). We expect grantees will need to complete Template I three times during their planning period (once for initial completion of the template; two more times for revisions to the template). It is common during the planning and early stages of grants that details of the design and implementation change due to unexpected challenges, resulting in revisions being needed to the template.

A7. Special Circumstances

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

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on

September 15, 2014, Volume 79, Number 178, page 54985, and provided a sixty-day period for public comment. During the notice and comment period, no comments were received.

Consultation with Experts Outside of the Study

None. ACF staff consulting internally with staff from FYSB and OPRE to create the template.

A9. Incentives for Respondents

No incentives for respondents are proposed for this information collection.

A10. Privacy of Respondents

Information collected from the template will be kept private to the extent permitted by law. Grantees will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. All federal staff and any contractors involved will comply with all Federal and Departmental regulations for private information. Information will not be maintained in a paper or electronic system from which they are actually or directly retrieved by an individual's personal identifier.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

**A12. Estimation of Information Collection Burden
Newly Requested Information Collections**

The burden table provides the estimated total/annual reporting burden calculations for the one instrument included in this request. The total/annual burden is estimated to be 240 hours.

Respondents are PREP program grantees. It is estimated that each grantee will have approximately four respondents complete various sections of the template. Information collection activity will occur during the first year of the grants, meaning the total number of respondents is the annual number of respondents, as well.

The number of responses represents the total number of times a respondent will complete the implementation plan instrument over a one year period: we expect that respondents will complete it three times (once for initial completion of the template; two more times for revisions to the template). The burden hours are averaged across all respondents. Burden hours are rounded to the nearest hour. Assumptions are as follows:

Implementation design template: Across the planning year, a maximum of 20 grantees will complete the Implementation design template. It is anticipated that approximately four respondents, per grantee, will complete sections of the template. Respondents will

complete/revise the template up to three times. Respondents first will complete the full template, which we estimate will take up to one hour per respondent; later, respondents will make revisions, and each revision will take up to one hour. This yields an estimated total annual burden of 240 hours (20 grantees * 4 respondents per grantee * 3 responses * 4 hours per response).

Table A12.1 Total Burden Requested Under this Information Collection Request

Instrument	Total/Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total/Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Template 1: Implementation design template	80	3	1	240	\$33.38	\$8,011.20
Estimated annual burden				240		\$8,011.28

Total Annual Cost

The total burden cost is estimated to be \$8,011.20. For all cost calculations, we estimate the average hourly wage for program directors and managers to be the average hourly wage for “Social and Community Services Manager” (\$33.38), taken from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, 2015.

A13. Cost Burden to Respondents or Record Keepers

These information collection activities do not place any additional costs on respondents or record keepers other than those described above.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request, including the development of the templates and reviewing the implementation design plans, will be \$12,717.60. Annual costs are estimated as follows:

- Hours to develop template: 40
- Hours to review each template: 240, derived by multiplying the following:
 - Number of templates: 20
 - Hours to review each template: 4
 - Numbers of revisions to each template: 3
- Cost per hour: \$45.42 (CY17 hourly rate for a government employee, GS-13 step 1)

280 hours, multiplied by \$45.42, equals \$12,717.60.

A15. Change in Burden

This is an additional individual information collection request under generic clearance 0970-0356.

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

The schedule for data collection for PREIS grants is shown below in Table A16.1 (schedule for other grants, for example State PREP grantees, may be different). All dates are dependent on OMB approval of this ICR.

Table A16.1 Schedule for PREIS Implementation Planning Data Collection

Activity	Date
Grantee awards	September 30, 2016
Implementation design template	Completed up to three times (initial draft, and two revisions) between March 2017-March 2018

No publications are expected from this data collection.

A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.