**To:** Steph Tatham

 Office of Information and Regulatory Affairs (OIRA)

 Office of Management and Budget (OMB)

**From:** Anna Solmeyer

 Office of Planning, Research, and Evaluation (OPRE)

 Administration for Children and Families (ACF)

**Date:** October 13, 2016

**Subject:** Request for Non-Substantive Changes to Building Bridges and Bonds (B3) Evaluation – Adjustments to Baseline Employment Survey, Mobile Device Survey and Burden Assumptions, and Updated PIA (OMB Control Number 0970-0485)

The Office of Planning, Research and Evaluation (OPRE) in the Administration for Children and Families (ACF) at the U.S Department of Health and Human Services has funded the Building Bridges and Bonds (B3) evaluation. This change request is for minor modifications to 1) the baseline employment survey (9 - Baseline Survey for Sites Testing Employment Intervention), and 2) the mobile device surveys (18 – Mobile Device Employment survey and 19 – Mobile Device Parenting and Coparenting Survey) and burden assumptions. The change request also includes the updated, signed PIA for the nFORM system. Instruments 9, 18, and 19 were previously approved under OMB Control Number 0970-0485, with an expiration date of 09/30/2019.

B3 is a rigorous, multi-site evaluation that includes an implementation study and an impact study. B3 is partnering with six programs that serve low-income fathers to understand the effectiveness of strategies used to enhance fathers’ participation in fatherhood programs, to increase fathers’ stable employment and improve their economic circumstances, to encourage fathers’ consistent and positive engagement with their children, and to improve constructive cooperation with co-parents. The B3 impact study will use a randomized control design, which includes a baseline survey and a 6-month follow up survey, along with other data collection efforts including an in-program mobile device survey.

**Updates to Baseline Employment Survey**

Minor changes to the baseline employment survey were made as a result of the team testing and programming the survey. A summary of these changes is below; more details are available in the tracked changes version of the survey (9 - Baseline Survey for Sites Testing Employment Intervention\_Track Changes\_10.12.16).

* Added instructions for survey programmers (the survey is self-administered using ACASI)
* Added and clarified instructions to respondents
* Fixed errors in wording and skip logic
* Made minor wording changes in a few questions or response categories to improve clarity

**Updates to Mobile Device Surveys and Burden Assumptions**

*Minor changes to survey content*

Minor changes to the mobile device surveys were made as a result of testing and programming the surveys. More details about the specific changes made are available in the tracked changes version of the surveys (18 – Mobile Device Employment Survey\_Tracked Changes\_9.28 and 19 – Mobile Device Parenting and Coparenting Survey\_Tracked Changes\_9.28).

* Simplified wording of the items
* Updated instructions to respondents
* Updated the B3 information that is available via the weblink in the mobile survey
* Revised Module B so it is relevant to fathers who never engaged in the program

*Changes in burden assumptions*

While the ultimate number of burden hours does not increase, we now expect responses from more respondents than initially planned, and have also refined our plan so that each respondent answers fewer questions, on average. These changes are based on the finalization of the mobile device survey methodology since the initial OMB submission. Specifically, there are three changes that affect the burden assumptions:

1. **Increase in number of respondents:** Getting at least one survey response from more respondents than planned is now expected. These changes are noted in Appendix E - Assumptions for Calculation of Burden Estimates\_TrackedChanges\_9.28.16. This is for two reasons:
	1. Fathers with non-smartphones and email addresses will be eligible to receive the mobile device surveys. Initial assumptions were based only on fathers with smartphones because the incentives were going to be delivered via smartphones. Since then, we have adjusted the plan so that incentives are now available via smartphones or email. This expands the eligibility to fathers who do not have smartphones, but who do have active email addresses.
	2. We would like to survey fathers who were randomly assigned but who never participated in services within the first 5 weeks of their random assignment. Questions from Module B already approved by OMB will be sent to these fathers. This group was never factored into initial burden estimates.
2. **Decrease in number of questions to which each father responds:** Originally, we assumed that all fathers would respond to the same number (5) of survey modules. Our revised assumption is that all fathers are not eligible for the same number of modules. Most fathers will be eligible for far fewer than the maximum number. Only the program group fathers in the parenting sites will be eligible to receive up to 5 surveys. Program group fathers in the employment sites will be eligible to receive up to 4 surveys. Finally, control group fathers in both the parenting and employment sites will be eligible to receive up to 2 surveys total. Averaging these together results in the weighted average of 3.28 responses noted in Table A.4 Burden Estimates (changes reflected in Appendix E – Assumptions for Calculation of Burden Estimates\_TrackedChanges\_9.28.16).
3. **Decrease in survey module length:** Originally, we assumed that each survey module would take an average of 7 minutes. The pre-test experience indicated that it will take fewer than 7 minutes, on average, to complete each survey module. The Average Burden Hours Per Response should be adjusted down to 6 minutes. This change is reflected in several places in the OMB package which have been revised and attached here: Table A.3 Incentives for Participation, Table A.4 Burden Estimates in Supporting Statement A, and time estimates in the surveys.

Taken together, the proposed changes result in a slight reduction in overall burden as noted in Table A.4.

**Updated Privacy Impact Assessment for nFORM**

As discussed during the original review and approval of the B3 information collection request, since some data for B3 will be collected through the nFORM Management Information System (approved under OMB #0970-0460), the nFORM PIA was updated, reviewed, and approved by the appropriate officials in HHS.

**Table A.3 Incentives for Participation (Updated)**

|  |  |  |  |
| --- | --- | --- | --- |
| **Research Activity** | **Length** | **Incentive Amount** | **When** |
| Baseline surveys (Attachments 8 & 9) | 30 min | $25 | At time of study intake |
| Updating contact information with the survey firm | 10 min | maximum of $7 | 1-4 months after baseline |
| Follow-up surveys (Attachments 10 & 11) | 40 min | $35 | 6 months after baseline |
| Participant focus groups (Attachment 16) | 120 min | $20 | 6 or 18 months after baseline |
| Mobile device surveys (Attachments 18 & 19) | 30 min  | maximum of $25  | 1 – 2 months after baseline |
| Mother focus group (Attachment 17) | 60 min | $20 | 6 or 18 months after baseline |

**Table A.4 Burden Estimates (Updated)**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Instrument | Respondent | Total Number of Respondents | Annual Number of Respondents | Number of Responses Per Respondent | Average Burden Hours Per Response | Annual Burden Hours | Average Hourly Wage | Total Annual Cost |
| 1 - Screening questions for parenting intervention  | Applicant | 4,000 | 1,333 | 1 | 0.083 | 111 | $4.92 | $546.12 |
| Staff[[1]](#footnote-1) | 36 | 12 | 111 | 0.083 | 111 | $27.86 | $3,092.46 |
| 2 - Screening questions for employment intervention | Applicant | 900 | 300 | 1 | 0.250 | 75 | $4.92 | $369.00 |
| Staff[[2]](#footnote-2) | 12 | 4 | 75 | 0.250 | 75 | $27.86 | $2,089.50 |
| 3 - Consent Materials for Parents of Fathers under 18  | Parent of Applicant | 500 | 167 | 1 | 0.167 | 28 | $4.92 | $137.76 |
| Staff[[3]](#footnote-3) | 36 | 12 | 14 | 0.167 | 28 | $27.86 | $780.08 |
| 4 - B3-specific eligibility data | Applicant | 6,400 | 2,133 | 1 | 0.017  | 36 | $4.92 | $177.12 |
| Staff[[4]](#footnote-4) | 72 | 24 | 89 | 0.017 | 36 | $27.86 | $1002.96 |
| 5 - B3-specific enrollment data  | Applicant | 2,700 | 900 | 1 | 0.153 | 138 | $4.92 | $678.96 |
| Staff[[5]](#footnote-5) | 72 | 24 | 38 | 0.151 | 138 | $27.86 | $3,844.68 |
| 6 - B3 tracking of attendance in services for program group members | Staff[[6]](#footnote-6) | 72 | 24 | 363 | 0.008  | 70 | $27.86 | $1,950.20 |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Instrument | Respondent | Total Number of Respondents | Annual Number of Respondents | Number of Responses Per Respondent | Average Burden Hours Per Response | Annual Burden Hours | Average Hourly Wage | Total Annual Cost |
| 7 - Additional nFORM burden for non-Grantee site  | Applicant | 450 | 150 | 1 | 0.250 | 38 | $4.92 | $186.96 |
| Staff[[7]](#footnote-7) | 12 | 4 | 1,969 | 0.0343 | 270 | $27.86 | $7,522.20 |
| 8 & 9 - Baseline surveys  | Applicant | 2,842 | 947 | 1 | 0.642 | 608 | $4.92 | $2,991.36 |
| 10 & 11 - 6 month follow-up surveys | Applicant | 2,430 | 810 | 1 | 0.667  | 540 | $4.92 | $2,656.80 |
| 12 & 13 - Staff and management semi-structured interviews  | Staff[[8]](#footnote-8) | 240 | 80 | 2 | 1.5 | 240 | $27.86 | $6,686.40 |
| 14 & 15 - Staff surveys  | Staff[[9]](#footnote-9) | 240 | 80 | 1 | 0.667 | 53 | $27.86 | $1,476.58 |
| 16 - Participant focus groups  | Applicant | 160 | 53 | 1 | 2.0  | 106 | $4.92 | $521.52 |
| 17 - Mother Focus Groups | Co-parent of Applicant | 80 | 27 | 1 | 1.0  | 27 | $4.92 | $132.84 |
| 18 & 19 - Mobile device surveys | Applicant | 1,728 | 576 | 3.25 | 0.1 | 187 | $4.92 | $920.04 |
| 20 - Post-session debrief for sites testing parenting intervention  | Staff[[10]](#footnote-10) | 36 | 12 | 104 | 0.083 | 104 | $27.86 | $2,897.44 |
| Data Collection Total |  |  |  |  |  | 3,019 |  | $40,660.98 |

1. This burden is categorized as record-keeping burden. [↑](#footnote-ref-1)
2. This burden is categorized as record-keeping burden. [↑](#footnote-ref-2)
3. This burden is categorized as record-keeping burden. [↑](#footnote-ref-3)
4. This burden is categorized as record-keeping burden. [↑](#footnote-ref-4)
5. This burden is categorized as record-keeping burden. [↑](#footnote-ref-5)
6. This burden is categorized as record-keeping burden. [↑](#footnote-ref-6)
7. This burden is categorized as record-keeping burden. [↑](#footnote-ref-7)
8. This burden is categorized as record-keeping burden. [↑](#footnote-ref-8)
9. This burden is categorized as record-keeping burden. [↑](#footnote-ref-9)
10. This burden is categorized as record-keeping burden. [↑](#footnote-ref-10)