



Supporting Statement for Request for Clearance:

OFFICE ON WOMEN'S HEALTH  
CAMPUS SEXUAL ASSAULT POLICY AND PREVENTION INITIATIVE  
CROSS-SITE EVALUATION

Contact Information:

Brittany Perrotte, MPH

Public Health Analyst

Office on Women's Health

U.S. Department of Health and Human Services

200 Independence Avenue, S.W., Room 732F.9

Washington, DC 20201

202-401-1170

Fax: 202-260-7184

[Brittany.Perrotte@hhs.gov](mailto:Brittany.Perrotte@hhs.gov)

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**SUPPORTING STATEMENT**  
**CROSS-SITE EVALUATION OF THE OFFICE ON WOMEN'S HEALTH COLLEGE**  
**SEXUAL ASSAULT POLICY AND PREVENTION INITIATIVE**

**Section A: JUSTIFICATION**

**A.1 Circumstances Making the Collection of Information Necessary**

There are approximately 3,000 four-year and 2,000 two-year colleges and universities in the U.S., and many post-secondary schools have no or limited policies and procedures in place to prevent sexual assault. The College Sexual Assault Policy and Prevention Initiative (CSAPP) of the Department of Health and Human Services, Office on Women's Health is a 3-year cooperative agreement awarding 9 grants of \$100,000 - \$250,000 per budget period to grantee organizations working to facilitate sexual assault policy and prevention programming at post-secondary institutions. The purpose of this data collection is to gather qualitative information from grantees to determine success and progress in achieving the three main goals of the initiative.

The three main goals of the CSAPP Initiative are the following: 1) Disseminate sexual assault policy and prevention information to organizations in position to influence and implement policies and practices at post-secondary schools; 2) provide technical assistance to post-secondary schools to establish policies and practices that prevent sexual assault; and 3) assess the success of policy establishment and sustained prevention strategies for the partnering organizations and the post-secondary schools. This data collection is authorized by Section 301 of the Public Health Service Act (42 U.S.C.241).

**A.2 Purpose and Use of Information**

The College Sexual Assault Policy and Prevention Initiative (CSAPP) of the Department of Health and Human Services, Office on Women's Health is a 3-year cooperative agreement with the aim of improving sexual assault policy and prevention programming at post-secondary institutions. Each of the nine CSAPP grantees is required under the terms of its cooperative agreement with OWH to establish Memoranda of Understanding with a) two to five national, regional or state organizations in a position to influence policy and practices at post-secondary schools and b) eight or more post-secondary schools to improve policies and practices related to sexual assault prevention. To date, National Opinion Research Center, a contractor for the Office on Women's Health, has collected primarily quantitative data in the form of quarterly grantee progress reports to assess the types of technical assistance grantees received from OWH, grantee progress and success to date in establishing partnerships and communicating with partners; formation of sexual assault task forces and response teams; establishment and/or strengthening of policies and programs to prevent campus sexual assault; and barriers and facilitators to establishing and implementing evidence-based campus sexual assault-related policies and procedures.

This is a new data collection and OWH is requesting OMB approval. The purpose of this data collection is to gather qualitative data across the nine grantee organizations and their partners to gain a full understanding of grantee and partner perceived success over the course of the three year project; grantee and partner experiences with the initiative; barriers and facilitators to project implementation; sustainability of grantee efforts; and anecdotal or other evidence of reductions in sexual violence on campus. The overall research questions for this project are:

1. How successful were the Grantees at establishing partnerships with campus and organizational partners? What barriers, solutions, and facilitators related to successful partnerships?
2. How successful were the Grantees at establishing a Technical Advisory Group (TAG) for their project? With the establishment of the TAGs, what forms and levels of technical assistance (TA) are Grantees and their TAGs providing to participating campuses? What are the target populations for interactive TA activities and are goals accomplished?
3. How successful were the Grantees at establishing partnerships with campus and organizational partners? What were some barriers, solutions, and facilitators related to successful partnerships?
4. How successful were the Grantees at establishing functional Task Forces and Sexual Assault Response Teams on each campus for their project? To what extent was there successful collaboration between the Grantees and the respective Task Forces and SARTs? What were some barriers, solutions, and facilitators related to successful Task Forces and SARTs?
5. What communication strategies are Grantees using to disseminate information about and encourage implementation of evidence-based college sexual assault prevention policies and programs? Are they disseminating resources provided to them by the Office on Women's Health? What are the target populations for communication activities and are goals achieved? What communication strategies seemed to get the most traction across the campuses?
6. What approach or strategies did grantees take to implement gender-based approaches? What gender-based activities or strategies did they implement?
7. How successful were grantees at implementing sexual violence prevention programming and sexual misconduct policy and protocol changes at post-secondary institutions? What were some barriers, solutions, and facilitators related to success? What were grantees' major achievements?

This data collection will be conducted by NORC at the University of Chicago who will obtain primary qualitative data from two main sources. The first data source (Attachment A) will be key informant interviews with CSAPP Initiative grantee-project implementation staff. The second data source will be key informant interviews with staff from a sample of partner campuses (Attachment B). NORC plans to conduct one interview per grantee and two to four partner interviews per grantee. NORC will conduct one-on-one interviews with both the lead point of contact from the grantee organization

and partner campus staff. If the point of contact wishes to invite colleagues to the interview, NORC will conduct a group interview, depending on the approach the grantee feels is best to understand their program fully.

OWH hopes to gather information about campus sexual assault prevention strategies employed during the period of performance for this initiative, and to share this information with post-secondary institutions across the country. OWH will also use relevant lessons learned to inform the development of future funding opportunities for new violence prevention programs and initiatives. One of the purposes of this evaluation is to gain more information about project successes, barriers and facilitators to project implementation and sexual assault-related policy and practice change, project sustainability, and overall project outcomes.

### **A.3 Use of Improved Information Technology and Burden Reduction**

All respondents will receive an email (Attachments C and D) explaining the purpose of the interviews and asking them to participate, along with a Doodle poll where they can indicate one-hour time slots when they are available for an interview. An email reminder will be sent to any non-respondents after the initial email, highlighting the importance of the interviews and encouraging potential respondents to participate.

In order to reduce burden on interviewees and make the most of their time, NORC will review all past relevant quarterly progress reports and will only ask questions required to gather the remaining information needed to answer the research questions. Where indicated using brackets in the instruments, NORC will tailor the general grantee and campus interview protocols by inserting information already known about the specific grantee program so that grantees do not need to return to their records in order to answer the questions. Once an interview time is scheduled, NORC will send the interviewee a list of interview topics at least one week in advance of the interview, so that the respondent can review if time permits. Each interview will be approximately one hour to minimize burden.

### **A.4 Efforts to Identify Duplication and Use of Similar Information**

No effort to collect similar data is being conducted within the agency. Additionally, no data collection efforts outside the agency have been made to collect this information. The respondents are participants in a relatively new OWH project and the information is specific to the assessment of each grantee's program.

### **A.5 Impact on Small Businesses or Other Small Entities**

Some of the campus partners are small community colleges, but the burden of the interviews will be low, and thus the impact will be minimal. This study should not unduly affect small businesses or small entities.

### **A.6 Consequences of Collecting the Information Less Frequently**

The design of this study only requires one data collection activity per respondent. We plan to conduct all interviews in April – June 2019, with one interview per respondent. Approval is sought for January 1, 2019 to December 31, 2019 to allow time for interview preparation, conducting of interviews, data analysis, and reporting.

Without this data, OWH will not be able to fully understand the degree to which, over the course of the entire project period, grantees and campus partners were successful in establishing partnerships, and campus-based entities were able to address sexual assault; barriers and facilitators to program implementation and establishment of policies; sustainability of project activities; and project challenges and achievements. There are no legal obstacles to reduce the burden of collection.

#### **A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

The proposed program assessment fully complies with all guidelines of 5 CFR 1320.5 (d) (2).

#### **A.8 Comments in Response to the Federal Register Notice/Consultation**

The data collection notice for the evaluation of the *College Sexual Assault Policy and Prevention Initiative* was published in the *Federal Register*, volume 83 number 167 page 43882 on August 28, 2018. A copy of the 60-day Federal Register notice is included as Attachment E. There were no comments received from the public regarding this data collection.

The DHHS/OWH Project Officer for this data collection is Brittany Perrotte. Additionally, OWH engaged NORC at the University of Chicago to conduct the cross-site evaluation, including development of all key informant interview protocols for this data collection.

#### **A.9 Explanation of Any Payment or Gift to Respondents**

There will be no payment, gift, or reimbursement to respondents for time spent.

#### **A.10 Assurance of Confidentiality Provided to Respondents**

The contractor, NORC at the University of Chicago, will not collect any identifying, personal data from participants, and names will not be mentioned anywhere in the final report. While the final report may include a list of roles and/or titles of the individuals NORC interviewed, these roles and titles will not be mentioned anywhere else in the report, and titles will not be affiliated with institutional names. Furthermore, NORC will ensure that all qualitative data gathered will not be linked with contact information and that it will not be possible to determine the source of the data. Data will be treated in a secure manner and will not be disclosed, unless otherwise compelled by law, and NORC will use the data for analytic and evaluation purposes only.

NORC received a Determination of Not Human Subjects Research for this study on the NORC IRB on June 26, 2018. NORC will ensure that all qualitative data gathered from interviews will not be linked with contact information and that it will not be possible to determine the source of the data.

### A.11 Justification of Sensitive Questions

The items and questions asked in this evaluation are not of a sensitive nature. Furthermore, all protocols used will be reviewed by the NORC Institutional Review Board to ensure that respondents' rights are protected.

### A.12 Estimates of Annualized Hour and Cost Burden

This evaluation is a one-time effort conducted for one year with an estimated maximum of 45 burden hours. Exhibit A-1 presents the hourly burden breakdown that was used to derive the total burden time. NORC expects each key informant interview to be completed in approximately 60 minutes. Exhibit A-2 presents the annualized hourly costs for respondents.

**Exhibit A-1 Estimated Annualized Burden Hours**

Form Name	Number of Respondents	No. Responses per Respondent	Average Burden per Response (in hours)	Total Burden Hours
Grantee Key Informant Interviews	9	1	1	9
Partner Campus Key Informant Interviews	36	1	1	36
<b>Total</b>				<b>45</b>

**Exhibit A-2 Estimated Cost Burden**

Type of Respondent	Total Burden Hours	Hourly Wage Rate	Total Respondent Costs
Grantee Project Directors/ Points of Contact <sup>1</sup>	9	\$50.34	\$453.06
Campus Points of Contact <sup>2</sup>	36	\$44.41	\$1,598.76
<b>Total</b>			<b>\$2,051.82</b>

<sup>1</sup> Based on hourly wage for post-secondary administrators. Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, 2016-17, Top Executives, on the Internet at <https://www.bls.gov/ooh/management/top-executives.htm> (visited June 11, 2018).

<sup>2</sup> Based on hourly wage for post-secondary administrators. Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Outlook Handbook*, 2016-17, Post-Secondary Administrators, on the Internet at <https://www.bls.gov/ooh/management/postsecondary-education-administrators.htm>. (visited June 11, 2018).

### **A.13 Estimates of other Total Annual Cost Burden to Respondents or Record-keepers/Capital Costs**

There are no additional respondent costs associated with start-up or capital investments. Additionally, there is no operational, maintenance, or equipment respondent costs associated with continued participation in the assessment. The total annual cost burden to respondents or record-keepers is \$2,501.82 as presented in Exhibit A.2.

### **A.14 Annualized Cost to the Federal Government**

All costs for conducting this study are included in the contract between NORC at the University of Chicago and the Office on Women's Health under contract number HHSP2332015000481. The total estimated cost for the cross-site evaluation of the College Sexual Assault Policy and Prevention Initiative over a three-year period is \$593,595 to collect and analyze quarterly progress report and interview data, present findings, and write reports (inclusive of components not requiring OMB oversight). This is an annualized cost of approximately \$197,865. Exhibit A-3 presents the cost breakdown by major budget category.

#### **Exhibit A-3 Cost of the Proposed Study**

<b>Type of Cost</b>	<b>Cost</b>
Personnel Costs	\$566,877
Other Costs	\$26,718
<b>Total</b>	<b>\$593,595</b>

### **A.15 Explanation for Program Changes or Adjustments**

There are no changes in burden. This is a new project.

### **A.16 Plans for Tabulation and Publication and Project Time Schedule**

#### **Exhibit A-4 Project Time Schedule**

<b>Activity</b>	<b>Time Period</b>
Federal Register Notice and OMB Clearance	July 2018
Recruitment and Scheduling	Once OMB approval is received
Key informant interviews	Begin within a month of receiving OMB approval
Analysis & Reporting	Within two months of completion of the final interview

## **Publication**

Program findings will be summarized in a comprehensive Report and Executive Summary developed by NORC for OWH. The findings from this assessment will be shared with OWH staff and potentially staff from grantee organizations and additional staff at the HHS Office of the Assistant Secretary for Health.

## **Analysis Plan**

This data collection includes qualitative data only. Data analysis will be supervised by Elizabeth Mumford, Ph.D., Project Director. The key research questions pertaining to this data collection are:

Sample Size. Each of the nine OWH grantees has established Memoranda of Understanding with 8 to 11 post-secondary schools. While some partnerships have dissolved over the course of the project and new partnerships have formed, the average total has remained about 80 campus partner entities associated with the 9 grantees. We plan to interview one staff member from each grantee organization and two to four partner campus staff per grantee project, resulting in a maximum total of 45 interviews.

Qualitative Data Analysis: Qualitative data will be collected via semi-structured interview protocols tailored to each grantee project based on the information we already have on that project from quarterly progress reports and grantee calls. Interviews are designed to gain more in-depth information regarding grantee and partner perceived success over the course of the three year project; grantee and partner experiences with the initiative; barriers and facilitators to project implementation; sustainability of grantee efforts; and anecdotal or other evidence of reductions in sexual violence on campus.

NORC will analyze the data by identifying recurring themes relating to project outcomes and factors that served as facilitators and barriers to achieving campus-level changes, as well as lessons learned. We will utilize a case- and theme-based approach to analyzing qualitative data from both grantee and campus progress reports, guided by the evaluation research questions. To organize interview content, we will utilize either NVivo software (QSR International Pty Ltd., Melbourne, Australia) or Microsoft Excel. Regardless of the software used, our approach to coding will be both inductive and deductive. We will develop and define analytic categories based on research questions and salient analytic dimensions and operationalize the cross-site evaluation research questions and model-based analytic dimensions in a codebook, which will provide clear and concise guidelines for categorizing all qualitative data collected.

NORC will create an initial list of categories based on research questions and domains and draft a codebook—including codes, definitions, inclusion/exclusion criteria, an example of how the code is applied, and source—to guide subsequent coding of data from interviews. We anticipate additional categories and codes will arise out of discussions with CSAPP grantee staff and partners. We will use matrices to analyze



relationships and patterns in the data across communities for each research question (e.g., commuter colleges vs. large private universities vs. large public universities).<sup>3</sup>

Reporting: NORC will analyze the qualitative data by identifying recurring themes relating to factors that served as barriers and facilitators to achieving campus-level change and lessons learned. Findings will be summarized in a written report focusing on interview findings. Reports to OWH will include analysis of findings by theme as well as abbreviated case studies of specific grantee projects that exemplify key themes.

#### **A.17 Reason(s) Display of OMB Expiration Date is Inappropriate**

OMB expiration dates will be displayed on all materials.

#### **A.18 Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification statement identified in item 19 “Certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I.

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<sup>3</sup> Miles, Matthew B., and A. M. Huberman. (1994). *Qualitative data analysis: an expanded sourcebook*. Thousand Oaks: Sage Publications.