

**Supporting Statement A for Justification for the Revision of 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**

Office of Adolescent Health  
Office of the Assistant Secretary for Health  
Department of Health and Human Services  
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revised April 2018

## **Background**

This is a request for a revision of the Office of Management and Budget (OMB) approval of annual collection of performance data from Pregnancy Assistance Fund (PAF) grantees (0990-0460). 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. A new cohort of grants has been awarded in July 2018, and additional measures are requested to be added to the measures approved under OMB 0990-0460.

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). In August 2013, OAH awarded 4-year grants to the second cohort of 17 state agencies and tribal entities. In August 2015, OAH awarded 3 year grants to 3 states.

The newest PAF Funding Opportunity Announcement (FOA), released in the winter 2017. OAH awarded \$21.3 million to 23 State and Tribes for a 2-year period of performance, with a start date of July 1, 2018. The request for revision of the new cohort's measures will update items and 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 the supplementary forms.

**Exhibit 1– updated PAF Uniform Performance Measures, Cohort 5 (FY2018-FY2019)**

<b>Type of Respondent &amp; Form : All Grantees (N=23)<sup>1</sup></b>	<b>(Total: questions)</b>
	<b>Performance Data/Questions</b>
<b>All Grantees (N = 23)</b>	
<b>Training</b>	<b>(1 question)</b> <ul style="list-style-type: none"> <li>• # of grantee or partner staff that received training/professional development</li> </ul>
<b>Partnerships and Sustainability<sup>2</sup></b>	<b>( questions)</b> <ul style="list-style-type: none"> <li>• # of program partners engaged, by sector <ul style="list-style-type: none"> <li>○ Names and addresses of all program partner organizations<sup>3</sup></li> </ul> </li> <li>• # and type of program implementation sites</li> <li>• # of Program Implementation Sites in urban, rural, or suburban settings</li> <li>• # of subawardees planning continued implementation of core PAF services</li> </ul>

1 OAH has revised the grantee number to reflect final awards made in July 2018

2 Partnership questions revised, revisions based on items collected by OAH from Teen Pregnancy Prevention grantees (OMB # 0990-0438, Exp. 10/31/2018)

3 Revised item

<b>Core Services Provided to Participants<sup>4</sup></b>	<b>(4 questions)</b> # of expectant and parenting participants receiving: <ul style="list-style-type: none"> <li>• Support in obtaining student health care that covers costs of maternity and newborn care e</li> <li>• child care</li> <li>• family housing</li> <li>• material needs, such as</li> <li>• Flexible or alternative academic scheduling</li> <li>• Education to improve parenting skills</li> <li>• Education to strengthen marriage</li> <li>• Post-partum counseling</li> </ul> # of expectant and parenting participants receiving: <ul style="list-style-type: none"> <li>• Prenatal care and delivery</li> <li>• Infant or foster care</li> <li>• Adoption</li> </ul>
<b>Educational Level &amp; Attainment<sup>5</sup></b>	<b>( 4 questions)</b> <ul style="list-style-type: none"> <li>• # of expectant and parenting participants that dropped out of HS</li> <li>• # of eligible HS students who graduate from HS</li> <li>• # of expectant and parenting participants preparing for GED</li> <li>• # who receive the GED</li> </ul>
<b>Maternal and Child Outcomes<sup>6</sup></b>	# repeat pregnancies reported among parenting participants # of preterm births # of low birth weight births

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4 Services questions revised to reflect the language included in the newest FOA released in 2017

5 New measure for this ICR; had been collected previously under the cohort 2 PAF data collection #0990-0416

6 New measure for this ICR; had been collected previously under the cohort 2 PAF data collection #0990-0416

<p><b>Services provided by Grantees providing funded by State Attorney General's Office (AGs)<sup>7</sup></b></p>	<p># of eligible expectant female participants experiencing violence who receive<sup>8</sup>:</p> <ul style="list-style-type: none"> <li>• intervention services</li> <li>• accompaniment services, by type</li> <li>• supportive social services, by type</li> </ul> <p># of governments, law enforcement agencies, or courts receiving training/technical assistance on:</p> <ul style="list-style-type: none"> <li>• identification of eligible pregnant participants experiencing violence</li> <li>• assessment of immediate/short term safety of eligible pregnant participants</li> <li>• maintenance of complete records</li> <li>• identification and referral of eligible pregnant participants to intervention, accompaniment, supportive social services</li> </ul> <p># of professionals receiving training/technical assistance on:</p> <ul style="list-style-type: none"> <li>• identification of eligible pregnant participants experiencing violence</li> <li>• assessment of immediate/short term safety of eligible pregnant participants</li> <li>• maintenance of complete records</li> <li>• identification and referral of eligible pregnant participants to intervention, accompaniment, supportive social services</li> </ul>
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## 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 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.

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<sup>7</sup> New category of measures includes a revision of existing

<sup>8</sup> Revised

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).

### **3. 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. The supplemental documents include screenshots from the PDS used by 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 1 months (by July 30) of the end of the reporting period (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. OAH requests a 3 year clearance, as OAH anticipates the possibility of funding a new cohort of PAF grantees in 2020 if the PAF grant program is reauthorized.

## **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 10/02/2018, in Volume 81, Number 191 page 49560 (**Attachment**). No public comments were received.

**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 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.

**Exhibit 2 –Outside Consultation**

<b>Year</b>	<b>Name/Title/Affiliation</b>	<b>Contact Information</b>
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 will be stored in a location within the contractor 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 the contractor's headquarters, 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 a total of 657 hours, or an average of 29 hours 30 minutes per respondent; the respondent is the individual PAF grantee. OAH awarded 23 new PAF grants for a two-year project period beginning July 2018 (see Exhibit 3). The hour-burden estimates include the time spent by grantee staff to retrieve, compile, and verify the performance data reported 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 the 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. However, grantees would have to summarize data from across all implementation sites to report in aggregate to OAH.

**Exhibit 3: Annualized Burden Table**

<b>Forms</b>	<b>Type of Respondent</b>	<b>Number of Respondents</b>	<b>Number of Responses per Respondent</b>	<b>Average Burden Hours per Respondent</b>	<b>Total Burden Hours</b>
PAF Grantee (Training Form)	All PAF Grant Recipients	23	1	15/60	6
PAF Grantee (Partners Sustainability Form)	All PAF Grant Recipients	23	1	210/60	81
PAF Grantee (Reach and Demographics Form)	All PAF Grant Recipients	23	1	637/60	244
PAF Grantee (Core Services Form)	All PAF Grant Recipients	23	1	9	207
PAF Grantee (Education and Maternal Health Form)	All PAF Grant Recipients	23	1	5	115
Form for PAF Grantees funding State AG offices	PAF Grantees who fund state Attorney General (AG) offices only	2	1	2	4
<b>Total</b>	All Grantees: Grantee Staff	23	1		657

All PAF grantees will report data on training, partners and sustainability, reach and demographics, core services, educational outcomes, and maternal and child outcomes. We estimate it would take a total of approximately 29 hours 30 min. per year per grantee to aggregate and report this data to OAH, or 657 hours total for all grantees per year.

**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. There are no changes proposed.

**Partners and Sustainability.** Grantees or sub-awardees will report on measures of number and retention of partners. A new measure was added where grantees as part of their reporting would report the organization names and addresses from each program partner. We estimate that it will take each respondent approximately 4 hours per year to summarize and report all of the partners and sustainability information.

**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 hours 36 minutes per year to summarize and report these data. There are no changes proposed within this group of measures.

**Core Services:** Grantees will report on the number of program participants who received referrals to supportive services (such as education or housing assistance) made by program staff. This category of measures has been revised such that items on intimate partner violence have been moved to the separate form for Grantees funding State Attorney General (AG) Offices. The specific services tracked have been revised to reflect the most recent FOA; specifically, 2 new items have been added to this category to replace the previous 5 items: the number of PAF participants referred to any of 8 different services (including child care and educational services) and the number of participants referred to adoption services or foster care. We estimate that it will take each grantee 9 hours per year to summarize and report all of the Core Services data.

**Educational Outcomes:** Grantees funded in 2018 will report on educational status of expectant and parenting students at the end of year (graduation, drop out status). We estimate that it will take grantees 3 hours to summarize and report these data. These items represent a change in burden as they were not included in the previous request.

**Maternal and Child Outcomes:** Grantees will report on maternal outcomes of expectant students and young women served by the program. We estimate that it will take each grantee 2 hours per year to summarize and report these data. These items represent a change from the previous request.

**Services and Trainings for Grantees funding State Attorney General Offices (AGs):**

Only those grantees who are funding a state AG office will have to report these items. The items are revised versions of 2 of the core services items in the original approved form related to intimate violence prevention, plus one additional item. We estimate it will take each of the 2 grantees who are working with AG offices 2 hours per year to summarize and report these data.

**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 **\$26,720** or an average of **\$1162** per grantee respondent; there will be a total of **23** grantee respondents (see **Exhibit 4**).

**Exhibit 4–Estimated Annualized Cost to Respondents for Information Collection**

<b>Type of Respondent</b>	<b>Total Burden Hours</b>	<b>Average (Weighted) Hourly Wage Rate</b>	<b>Total Respondent Cost</b>
Grantees	657	\$40	\$26,280

*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 previous cohorts 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 revised data collection for the PAF cohort (FY2018-FY2019). Changes have been made to reflect the increased number of grant awards (23 grants were issued in 2018 for a 2 year period of performance; the original ICR had 19 grantee respondents). In addition, new items, as described previously in the annualized burden section, have been added to the menu of performance measures specifically for the fifth PAF cohort funded in 2018. New forms related to educational and maternal and child health outcomes were added. The partnership form was revised. The core services items were also revised.

## **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 July 30 of each year). The first data collection for the PAF recipients would be anticipated to occur on July 30, 2019. OAH would publish aggregated data reports annually (summarizing annual trends in the data across all of the PAF grantees) on its webpage.

PAF cohort 5 is funded for 2 years, the legislation authorizes the PAF program through 2019; OAH anticipates funding a new cohort in 2020, subject to reauthorization of the program.

## **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:**

Authorizing Legislation  
Forms  
Screenshots