# Sexual Risk Avoidance Education National Descriptive Study—Early Implementation Study (NDS-EIS)

# OMB Information Collection Request 0970-New Collection

# **Supporting Statement**

# Part A

**April 2019** 

Submitted by:
The Family and Youth Services Bureau
and
The Office of Planning, Research, and Evaluation

Administration for Children and Families U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building 330 C Street, SW Washington, DC 20201

> Project Officers: Jessica Johnson Seth Chamberlain

## Contents

Introd	luction	3
A1.	Necessity for the Data Collection	4
A2.	Purpose of Survey and Data Collection Procedures	5
A3.	Improved Information Technology to Reduce Burden	8
A4.	Efforts to Identify Duplication	9
A5.	Involvement of Small Organizations	9
A6.	Consequences of Less Frequent Data Collection	9
A7.	Special Circumstances	9
A8.	Federal Register Notice and Consultation	10
A9.	Incentives for Respondents	10
A10.	Privacy of Respondents	10
A11.	Sensitive Questions	12
A12.	Estimation of Information Collection Burden	12
A13.	Cost Burden to Respondents or Record Keepers	13
A14.	Estimate of Cost to the Federal Government	13
A15.	Change in Burden	13
A16.	Plan and Time Schedule for Information Collection, Tabulation and Publication	13
A17.	Reasons Not to Display OMB Expiration Date	13
A18.	Exceptions to Certification for Paperwork Reduction Act Submissions	14
Refer	ences	15
Table	1. Total Burden Requested Under this Information Collection	12

## **INSTRUMENTS**

Instrument #1 - Grantee Web Survey

Instrument #2 - Grantee Telephone Interview Protocol

## **ATTACHMENTS**

Attachment A Research Question-Instrument Crosswalk

Attachment B Web Survey Advance Email

Attachment C FAQ

Attachment D Web Survey Invitation Email

Attachment E Web Survey Reminder Email

Attachment F Telephone Interview Invitation Email

Attachment G 60-Day Federal Register Notice

#### **OVERVIEW**

## • Status of study:

O This is a new information collection as part of the Sexual Risk Avoidance Education National Descriptive Study (NDS). This current request is specific to the Early Implementation Study (EIS). The request is for three years.

## • What is being evaluated (program and context) and measured:

Through the NDS-EIS the contractor will conduct a basic investigation of SRAE program design and implementation during the first year of the grant program.

# • Type of study:

O The EIS is a descriptive study, compiling data from a document review, grantee web survey, and telephone interviews.

# • Utility of the information collection:

O The National Descriptive Study will generate an understanding of program design and implementation features that will inform current and future programs and policy. As part of the NDS, the EIS will enable ACF to better understand decisions grantees make regarding the design of their SRAE-funded programs and why they made those decisions.

## A1. Necessity for the Data Collection

As part of the federal government's ongoing efforts to support youth in making healthy decisions about their relationships and behaviors, in February 2018, Congress updated Title V, Section 510 of the Social Security Act to authorize the Sexual Risk Avoidance Education (SRAE) grant program. Administered by the Family and Youth Services Bureau (FYSB) within the Administration for Children and Families (ACF) of the U.S. Department of Health and Human Services (HHS), SRAE funds programs that teach adolescents to refrain from sexual activity. The programs will also provide education on personal responsibility, self-regulation, goal setting, healthy relationships, a focus on the future, and preventing drug and alcohol use. SRAE replaces the Title V, Section 510 Abstinence Education grant program, which Congress had passed as part of welfare reform in the mid-1990s. The SRAE legislation also calls for a national evaluation of the program.

ACF's funding announcements for the SRAE grant programs specified the program requirements for grantees according to the authorizing legislation. Grantees must use the funding to implement evidence-based or evidence-informed interventions that meet accepted scientific standards for medical accuracy, are age appropriate and culturally relevant for the intended population, and cover an "A–F" list of topics specified in the legislation.<sup>1</sup>

The legislation also calls for a national evaluation and also that ACF report to Congress on the evaluation findings. As part of ACF's SRAE national evaluation activities, ACF is conducting a National Descriptive Study. The study will focus on all SRAE grantees. It will start with a basic descriptive analysis of how SRAE grantees designed and implemented their programs, then will continue with an in-depth nationwide study of program implementation and youth outcomes. Ultimately, the National Descriptive Study will generate an understanding of program design and implementation features that will inform current and future programs and policy.

(ACF is also conducting other separate, distinct projects, as part of SRAE National Evaluation activities.)

This information collection request (ICR) focuses on the *National Descriptive Study's Early Implementation Study (NDS-EIS)*, described below. This is a new ICR. The *National Descriptive Study (NDS)* consists of three substudies:

- Early Implementation Study (NDS-EIS): The evaluation team will conduct a basic

.

<sup>&</sup>lt;sup>1</sup> Programs should address each of the following: (A) The holistic individual and societal benefits associated with personal responsibility, self-regulation, goal setting, healthy decision making, and a focus on the future; (B) The advantage of refraining from nonmarital sexual activity in order to improve the future prospects and physical and emotional health of youth; (C) The increased likelihood of avoiding poverty when youth attain self-sufficiency and emotional maturity before engaging in sexual activity; (D) The foundational components of healthy relationships and their impact on the formation of healthy marriages and safe and stable families; (E) How other youth risk behaviors, such as drug and alcohol usage, increase the risk for teen sex; (F) How to resist and avoid—and receive help regarding—sexual coercion and dating violence, recognizing that even with consent teen sex remains a youth risk behavior.

- investigation of SRAE program design and implementation during the first year of the grant program. **The EIS data collection activities are the subject of this ICR**.
- Nationwide Study (NDS-NWS): The evaluation team will conduct a more detailed, mixed-methods study of program implementation and youth outcomes, using grantees' reported performance measures. The team will also perform analyses to identify promising approaches to program implementation. We plan to submit a second package (under the same anticipated ICR number for the current request) in a couple years, related to the NDS-NWS.
- In-depth case studies (NDS-ICS): This potential study would involve a subset of
  grantees and program providers, allowing for an in-depth analysis of program
  implementation. If we move forward with this study, we plan to submit a third
  package (under the same anticipated ICR number for the current request) in a few
  years, related to the NDS-ICS.

Information obtained through the NDS-EIS will inform the development of the NDS-NWS. Furthermore, should ACF move forward with the NDS-ICS, the information collected from the NDS-EIS will inform the selection of the subset of grantees for data collection under that components.

Under the NDS-EIS, ACF currently seeks approval for a Grantee Web Survey (Instrument 1) and a Grantee Telephone Interview Protocol (Instrument 2). The data collected from these instruments will enable ACF to better understand decisions grantees make regarding the design of their SRAE-funded programs and why they made those decisions.

#### Study Background

The consequences of adolescent sexual activity remain a critical social and economic issue in the United States, shaping the lives of thousands of teens and their families every year. Although births to teen mothers have dropped sharply over the past 25 years, the teen birthrate remains higher in the United States than in other industrialized countries and varies widely across geographic regions and racial/ethnic groups (Martin et al. 2017). Adolescents and young adults account for half of all sexually transmitted infection (STI) cases each year (Centers for Disease Control and Prevention 2017). It is also frequently linked to risk behaviors such as alcohol and substance use, teen dating violence, and sexual assault. Interviews with adolescents and young adults show a desire for more guidance on the social and emotional aspects of romantic relationships, and on how to navigate decisions such as knowing when you are ready for a relationship and finding the right partner.

As part of the federal government's ongoing efforts to support youth in making healthy decisions about their relationships and behaviors, in February 2018, Congress updated Title V, Section 510 of the Social Security Act to authorize the SRAE grant program. Administered by FYSB within ACF of HHS, SRAE funds programs that teach adolescents to refrain from sexual activity. The programs will also provide education on personal responsibility, self-regulation, goal setting,

healthy relationships, a focus on the future, and preventing drug and alcohol use. SRAE replaces the Title V, Section 510 Abstinence Education grant program, which Congress had passed as part of welfare reform in the mid-1990s. The SRAE legislation also calls for a national evaluation of the program.

SRAE provides \$60 million in annual formula grant funding to U.S. states and territories for sexual risk avoidance education. Funding levels are determined in proportion to the number of low-income children in each state, ranging from less than \$100,000 to more than \$3 million per year. In states that do not request formula funding, local program providers can apply directly to the federal government for funding through a newly created competitive SRAE grant program. The resulting mix of State SRAE grants and Competitive SRAE grants will extend the program's reach to all geographic areas of the United States. ACF also funds a third group of SRAE grants through annual appropriations, called Departmental SRAE grants.

ACF's funding announcements for the SRAE grant programs specified the program requirements for grantees according to the authorizing legislation. Grantees must use the funding to implement evidence-based or evidence-informed interventions that meet accepted scientific standards for medical accuracy, are age appropriate and culturally relevant for the intended population, and cover an "A–F" list of topics specified in the legislation.

# Legal or Administrative Requirements that Necessitate the Collection

As described above, when Congress updated Title V, Section 510 of the Social Security Act to authorize the SRAE grant program in February 2018, it also required a national evaluation of the program.

#### A2. Purpose of Survey and Data Collection Procedures

## **Overview of Purpose and Approach**

The SRAE National Descriptive Study will yield important information on the design and implementation of SRAE programs. Through this study, ACF aims to answer a range of descriptive questions. How did states respond to the SRAE legislation? How did grantees design and implement their programs? How did the grantees support high quality implementation, and what successes and challenges did they face? What types of youth participated in the programs? What did youth learn from the programming and what outcomes did they achieve? Answers to these questions will help ACF tell the story of the SRAE grant program to the general public, Congress, the SRAE grantees, state and local agency staff, and youth program providers around the country.

The National Descriptive Study's Early Implementation Study (NDS-EIS) will answer an initial set of high-level research questions. It will collect data through a document review, the grantee web survey, and telephone interviews. Together, these data will begin to help ACF tell the story of SRAE grantees, specifically, what key decisions grantees made regarding the design of their SRAE-funded programs and why they made those decisions. Data collected through the document review and grantee web survey will provide a broad picture, whereas information

collected through the telephone interviews will enable grantees to provide more in-depth information. ACF will determine the primary focus of the telephone interviews after completing preliminary analyses of web survey data.

#### **Research Questions**

ACF proposes to examine the following high-level research questions through the EIS data collection:

- 1. What are the components of each funded program?
- 2. What structure(s) do grantees use to organize their programs?
- 3. What are the primary goals, objectives, and messages of each funded program?
- 4. What populations do they focus on with SRAE programming?
- 5. What are the program implementation plans?
- 6. Where (in which geographic locations) will they provide programming, and what is the context for adolescent health programming in these areas?
- 7. How do grantees plan to meet the SRAE legislative requirements and program expectations?
- 8. How do grantees' plans align with the SRAE program requirements, as laid out in the legislation and in the funding opportunity announcements? And, are there any systematic differences?

Attachment A provides a crosswalk of the research questions to the data collection instruments.

#### Study Design

ACF is interested in learning about the key decisions grantees made in designing their SRAE programs and the factors involved in making those decisions. To understand and address these research questions, ACF proposes reviewing extant grantee documents and administering a web survey to all SRAE funded grantees, and conducting telephone interviews with grantees.

The contractor, Mathematica Policy Research, will first review grant applications, post-award plans, and the first semiannual reports (if available) of all SRAE grantees to extract information on grant structure, target populations, geographic location and context, and program components. Following the document review, grantees will be asked to complete a web survey. The web survey will allow grantees an opportunity to provide information that might not be available in the documents, such as implementation plans and plans to ensure compliance with the SRAE legislative and program requirements. After grantees have completed the web survey, the contractor will follow up with grantees through telephone interviews to obtain elaborated responses on key topics, such as how they integrate the legislative requirements into program plans.

Additional details regarding the study design are in Section B2 of Supporting Statement B.

# **Universe of Data Collection Efforts**

The current request for approval includes a *Grantee Web Survey* (Instrument 1) and *Grantee Telephone Interview Protocol* (Instrument 2).<sup>2</sup> The purpose of the Grantee Web Survey (Instrument 1) is to verify or update the information available in grant applications and postaward plans, gather information not available in the grant applications and postaward plans, and collect supplementary information about implementation. Grantees might be inconsistent in the information they include in documents that the contractor will review, and program changes might occur during the early implementation period. The contractor will administer the survey to grantee administrators or directors via the web. Questions will focus on what key decisions grantees made regarding the design of their SRAE-funded programs and why they made those decisions.

The contractor will interview grantees,<sup>3</sup> building on the survey responses to collect more qualitative, in-depth information.

Future ICRs (discussed in A1) for the NDS will include web surveys for program providers, protocols for case studies, and surveys for youth.

## A3. Improved Information Technology to Reduce Burden

The data collection plan is sensitive to issues of efficiency, accuracy, and respondent burden. The contractor will program and administer the web survey with Confirmit, a state-of-the-art survey software platform that the contractor uses to build and launch multimode, Section 508-compliant surveys. Confirmit offers several advantages for respondents. For example, Confirmit enables them to respond to the survey on their own time and using their preferred electronic device (smartphone, tablet, laptop, or desktop computers). The software has built-in mobile formatting to ensure that respondents taking a survey on a handheld device have the same experience as those taking the survey on a laptop or desktop. If needed, respondents can pause and restart the survey, with their responses saved. They can also go back and change responses, if needed.

After grantees have completed the web survey, the contractor will follow up with grantees by telephone to obtain additional information on items that are more suitable for phone follow-up than for web-based data collection.

<sup>&</sup>lt;sup>2</sup> The contractor will complete the document review described in this ICR. No burden to the public is associated with this activity.

<sup>&</sup>lt;sup>3</sup> We hope to follow-up with all grantees. Given contract resources at the time, we may purposefully select a sample of a minimum of 24 grantees. See B1 for detail on how we will select grantees, if needed.

# A4. Efforts to Identify Duplication

ACF has carefully reviewed the information collection requirements for this evaluation to determine information that is already available from existing studies and program documents and information it will have to collect for the first time. Although the information from existing sources provides value to our understanding of SRAE programs, ACF does not believe that it provides sufficient information on SRAE program design and initial implementation. This proposed data collection effort is essential to providing this information, as it is the first national evaluation of the newly legislated SRAE program.

Prior to data collection, the contractor will review two sets of documents: grantees' applications and post-award plans submitted to ACF. The contractor will also review grantees' first semiannual reports if those are available. The contractor will then customize surveys and interview protocols for each grantee to focus on information that is relevant for that grantee and that the documents reviewed did not provide. When applicable, the contractor will customize grantee web survey questions to verify information found in these documents, rather than to ask grantees who have already provided the information through other sources to respond a second time. The interviews will offer long-answer qualitative responses to key questions that are better suited to an interview format and are not available from other resources.

#### A5. Involvement of Small Organizations

About 45 of the 85 grantees (53 percent) are considered small entities. These grantees deliver the same services and must meet the same grant program requirements as other grantees. The contractor will minimize burden for all respondents, including small entities, by prefilling information in the web survey and scheduling interviews at times that are convenient to participants.

#### A6. Consequences of Less Frequent Data Collection

ACF intends to collect information only once, so it has planned no repetition of effort. Not collecting the information at all would substantially limit our understanding of the SRAE program and the value of the investment ACF will make in this study and in the SRAE program itself. In the absence of such data, the decisions made by grantees regarding the design and initial implementation of SRAE programs will be unclear, and future funding and operational decisions about sexual risk avoidance education programs will be based on insufficient information.

#### 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 November 16, 2018, Volume 83, Number 222, pages 57728–57729 and provided a 60-day period for public comment. A copy of this notice is attached as Attachment G. During the notice and comment period, no comments were received.

#### **A9.** Incentives for Respondents

No incentives for respondents are proposed for this information collection.

## A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. The contractor will inform respondents of all planned uses of data and that their information will be kept private to the extent permitted by law. The contractor will also notify respondents that while participation in SRAE evaluation efforts is a condition of their grant, they may choose not to respond to specific questions. This language will be included in the emails that will be sent to grantees inviting them to participate in the data collection as well as a frequently asked questions document (Attachments B through F).

With respondents' permission, the contractor will record each telephone interview. Following each interview, the interviewer will review his or her notes and refer to the recording as needed to fill in unclear or missing details.

As specified in the contract, the contractor shall protect respondents' privacy to the extent permitted by law and will comply with all federal and departmental regulations for private information. The contractor has developed a Data Safety and Monitoring Plan that assesses all protections of respondents' personally identifiable information. The contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor who perform work under this contract/subcontract are trained on data privacy issues and comply with the above requirements.

As specified in the evaluator's contract, the contractor shall use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Information Processing Standard. The contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable federal and departmental regulations. In addition, the contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information that ensures

secure storage and limits on access.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

The contractor will report data collected through the NDS-EIS in two ways, and assurances of privacy will reflect those two ways.

First, the contractor will create a summary profile for each grantee that will contain SRAE program design decision facts—for example, the selected program models, populations to be served, and number of total youth to be served. The contractor will report this information, much of which will be publicly available through other sources, for each state or organization receiving SRAE funding. Therefore, although such factual information will not be attributed to a specific respondent, it will be attributed to a specific grantee. Respondents will be made aware of how this factual information will be reported.

Second, the EIS report will discuss themes emerging from responses regarding how and why grantees made SRAE program decisions. These responses will not contain confidential information. The contractor will notify respondents that it will not attribute responses to these questions to themselves or their state or organization.

Beyond these two ways of reporting data, information will be kept private to the fullest extent of the law.

#### **A11. Sensitive Questions**

There are no sensitive questions in this data collection.

#### A12. Estimation of Information Collection Burden

Table 1 shows the estimated respondent burden for the data collection instruments under the NDS-EIS. ACF has funded 40 State SRAE grantees, 15 Competitive SRAE grantees, and 30 Departmental SRAE grantees, for a total of 85 grantees. We estimate all 85 administrators or program directors will respond to the grantee survey. Respondent burden is estimated at 1.5 hours for the web survey, and 1.5 hours for the telephone interview. The total estimated annual burden is 84 hours.

**Table 1. Total Burden Requested Under this Information Collection** 

			Number of	Average			
	Total	Annual	Responses	Burden	Annual	Average	Total
	Number of	Number of	Per	Hours Per	Burden	Hourly	Annual
Instrument	Respondents	Respondents	Respondent	Response	Hours	Wage	Cost

<sup>&</sup>lt;sup>4</sup> We hope to follow-up with all grantees. Given contract resources at the time, we may purposefully select a sample of a minimum of 24 grantees. See B1 for detail on how we will select grantees, if needed.

Survey for SRAE Grantees	85	28	1	1.5	42	\$40.01	\$1,680
Interview Guide for SRAE Grantees	85	28	1	1.5	42	\$40.01	\$1,680
	Estimated Annual Burden Total						\$3,361

#### **Total Annual Cost**

The estimated annual cost for the proposed data collection is \$3,361 (84 hours \* \$40.01). The estimated average hourly wage is based on the mean wage for "Social Scientists and Related Workers" according to the Bureau of Labor Statistics' May 2017 National Occupation Employment and Wage Estimate.

## A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

## A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$702,900. This includes 20 hours for a GS-12, 20 hours for a GS-14, and \$700,738 for contractor labor to administer the data collection. Annual costs to the federal government will be \$234,300 for the proposed data collection. Table 2 shows the total estimated costs by category for the EIS.

**Table 2. Total Estimated Costs by Category for this Information Collection** 

Cost Category	<b>Estimated Costs</b>
Design and Analysis Plan	\$19,356
OMB Clearance, IRB and CoC approvals	\$90,199
Development of Data Collection Instruments	\$52,011
and Protocols	
Technology Support (sample management	\$33,988
system and instrument programming and	
maintenance)	
Data Collection	\$170,712
Data Analysis	\$141,364
Reporting (detailed outline and final report),	\$193,108

Total \$700,738

# A15. Change in Burden

This is a new data collection.

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

For the quantitative web survey data, the contractor will calculate mean values across grantees for continuous variables (such as the planned number of youth to serve) and percentages for categorical and dichotomous variables (such as the percentage of grantees offering a particular curriculum on avoiding sexual risks). The contractor will also break down these means and percentages for relevant subgroups of interest—for example, State, Competitive, and Departmental grantees. The contractor will use qualitative coding software, either ATLAS.ti or NVivo, to organize and code the qualitative data from open-ended web survey questions and qualitative interviews. The contractor will also look for opportunities to construct quantitative variables from qualitative open-ended responses. Such opportunities include counts of grantees taking specific approaches for implementing the A–F requirements similarly.

#### Time Schedule and Publications

A schedule of the data collection and reporting efforts for the EIS follows:

- *Over two months, immediately following OMB approval*, data will be collected from all 85 grantees through the web survey.
- *Over two months following the web survey,* telephone interviews will be conducted with grantees.
- Once data collection is complete, a summary profile will be created for each grantee.
- About 6 months after the start of data collection, an EIS draft report delivered to ACF will summarize findings from the document review, web survey, and telephone interviews.

## 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 data collection.

# **REFERENCES**

Centers for Disease Control and Prevention. "Sexually Transmitted Disease Surveillance 2016." Atlanta, GA: U.S. Department of Health and Human Services, 2017.

Martin, J.A., B.E. Hamilton, M.J.K. Osterman, A.K. Driscoll, and T.J. Matthews. "Births: Final Data for 2015." *National Vital Statistics Report*, vol. 66, no. 1. Hyattsville, MD: National Center for Health Statistics, 2017.