

DATE: July 29, 2019

TO: Josh Brammer
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

FROM: Tia Brown
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Administration for Children and Families (ACF)

SUBJECT: Request for Non-Substantive Change to the Personal Responsibility Education Program Studies of Performance Measures and Adult Preparation Subjects (PREP PMAPS) (0970-0497).

This memo requests a nonsubstantive change to the information collection for the PREP Studies of Performance Measures and Adult Preparation Subjects (PMAPS) (0970-0497). In April 2017, OMB approved the collection of performance measures from State PREP (SPREP), Tribal PREP (TPREP), Competitive PREP (CPREP), and Personal Responsibility Education Innovative Strategies (PREIS) grantees. Approved information collections include participant entry and exit surveys for grantees to collect data from participants using a performance reporting system to submit aggregated data electronically.

At the time of OMB approval, new leadership at ACF led to internal discussions on the OMB-approved measures. Subsequently, ACF leadership approved two subsets of the OMB-approved measures to be collected on an interim basis while leadership continued to consider the remaining measures. These included the collection of the program implementation performance measures and the participant performance measures focused on demographics, special populations, and participant satisfaction.

Although we intended to submit a change request for approval to collect this more limited set of performance measures on an interim basis, unfortunately due to a miscommunication the request was never completed and the measures were fielded with respondents. **Note:** no additional questions were asked, only a subset of the OMB-approved questions. Please advise if ACF should submit this as a violation in the annual report of agency violations.

More recently, ACF leadership approved the collection of revised versions of the remaining performance measures which focus on participant behaviors and perceptions of program effects.

We are currently submitting instruments that reflect the following changes compared to the PREP PMAPS Participant Entry and Exit Surveys approved in April 2017:

- 1) remove sensitive items (by dropping items about oral sex or anal sex, modifying items asking about “vaginal sex” to ask about “sexual intercourse,” and deleting definitions of sexual behaviors);

- 2) modify and expand existing items related to adulthood preparation subjects;¹ and
- 3) add items to capture information from youth relevant to the success sequence for poverty prevention.^{2,3}

Additionally, due to the sensitive nature of some of the original questions, the previously approved versions of the surveys required separate versions for middle and high school youth (with not all items administered to middle school youth). Since ACF is proposing to remove the most sensitive questions, separate versions of the surveys are no longer necessary.

ACF's request for a nonsubstantive change to the entry and exit surveys decreases the overall burden estimate. With the changes to questions, we now estimate the entry survey to take 9 minutes (previously estimated to be 8 minutes) and the exit survey to take 8 minutes (previously estimated to be 15 minutes).

Through June 30, 2019 we estimate that about 138,249 program participants have completed entry surveys and approximately 110,599 have completed exit surveys. Following approval of the updated measures and prior to the April 2020 expiration date, we expect 138,249 program participants will complete the entry survey, 110,599 participants will complete the exit survey, and 93 grantees and 416 subawardees will submit data through the performance reporting system.

Table 2 presents the estimated burden for the revised performance measures data collection between OMB approval of the updated measures and April 2020.

¹ The legislation authorizing PREP specifies six adulthood preparation subjects (healthy relationships, adolescent development, financial literacy, parent-child communication, educational and career success, and healthy life skills) and requires that each PREP program address at least three of the six.

² The success sequence was first discussed by Haskins and Sawhill in *Creating an Opportunity Society* (Washington, DC: Brookings Institution; 2009. <https://www.brookings.edu/book/creating-an-opportunity-society/>), which identified a correlation between having income above the poverty level and three "norms:" (1) completing high school, (2) working full time, and (3) waiting until age 21 and marrying before having children.

³ The proposed items related to adulthood preparation subjects and the success sequence are also included in the performance measures for the Sexual Risk Avoidance Education Performance Analysis Study (30 day FRN posted on 05/23/19).

Table 2. Estimated Annual Burden Estimates for Performance Measures Data Collection July 2019 –April 2020

Instrument	Total Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours
Participant Entry Survey	138,249	1	.15	20,737
Participant Exit Survey	110,599	1	.13333	14,746
Performance reporting system data form - grantees	93	2	18 for State/Tribal; 14 for CPREP and PREIS	3,076
Performance reporting system data form - subawardees	416	2	14 for State/Tribal; 12 for CPREP	11,472

Estimated Total Annual Burden Hours:

50,031