То:	Josh Brammer, Office of Information and Regulatory Affairs (OIRA) Office of Management and Budget (OMB)
From:	Calonie Gray and Jessica Johnson Office of Planning, Research, and Evaluation (OPRE) Administration for Children and Families (ACF)
Date:	March 16, 2020
Subject:	Nonsubstantive Change Request –Sexual Risk Avoidance Education National Descriptive Study—Early Implementation Study (NDS-EIS) (OMB #0970-0530)

This memo requests approval of nonsubstantive changes to the approved information collection, Sexual Risk Avoidance Education National Descriptive Study—Early Implementation Study (NDS-EIS) (OMB #0970-0530).

Background

In July 2019, the Office of Management and Budget (OMB) approved the collection of data from Sexual Risk Avoidance Education (SRAE) grantees as part of the NDS-EIS. The approved information collection includes program level information about decisions made regarding grantees' implementation plans and the reasons for those decisions. The approved submission included two data collection instruments:

Instrument 1: SRAE Grantee Web Survey **Instrument 2:** Telephone Interview Protocol

A pretest of the grantee web survey was conducted with seven SRAE grantees. As a result of feedback received during the pretest we are proposing nonsubstantive changes to the web survey.

In addition, the ACF Family Youth and Services Bureau, who administers the SRAE grants, requested that we survey a greater number of grantees than originally specified in the approved information collection, including the FY18 General Departmental SRAE grantees and the FY19 General Departmental and Competitive grantees.

Overview of Requested Changes

Revisions to Instrument 1

We are currently submitting a revised Instrument 1 that reflects the following changes compared to the SRAE Grantee Web Survey approved in July 2019:

- 1) Revised instructions to improve clarity and emphasize key information.
- 2) Dropped 16 items around attitudes and opinions of those in the geographic areas served by the grant, and complex requests for hours of programming and supplemental content that are covered with less complexity elsewhere in the survey

- 3) Moved some questions around within survey and divided a few into sub-questions to improve navigation for programming web-based survey.
- 4) Modified several remaining items to clarify wording
- 5) Improved questions about program provision when the grantee is the sole provider, ensuring questions are consistent with those with the grantee uses sub-awardees as providers.
- 6) Added four text boxes to allow space for grantees to clarify responses, if needed

Based on the pretest, the proposed changes do not affect the estimated average time to complete. We do not request any changes to Instrument 2.

Adjustments to Burden Estimates

To account for the survey being administered to additional grantees, we have increased the total number of respondents to the survey from 85 to 122. For budget reasons related to adding the additional survey respondents, we have decreased the number of grantees with whom we will conduct telephone interviews (Instrument 2). As a result, overall burden remains the same. Table 1 presents the updated burden estimates.

	Total	Annual	Number of	Average	Annual		
Instrument	Number of	Number of	Responses Per	Burden Hours	Burden		
	Respondents	Respondents	Respondent	Per Response	Hours		
Survey for SRAE	85- 122	28 41	1	1.5	-42- 62		
Grantees							
Interview Guide for	85 45	28 15	1	1.5	42 23		
SRAE Grantees							
Estimated Total Annual E	85						

Table 1. Estimated Annual Burden Estimates for SRAE Grantee Data Collection

Time Sensitivities

ACF plans to field the information collections in April 2020 to ensure that all reporting can be completed by the end of 2020.