TO: Josh Brammer

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

FROM: Caryn Blitz

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DATE: May 7, 2020

SUBJECT: Non-Substantive Change Request - Sexual Risk Avoidance Education Program

(SRAE) Performance Analysis Study (PAS) (OMB #0970-0536).

This memo requests approval of non-substantive changes to the approved information collection, SRAE Performance Analysis Study (SRAE PAS) (OMB #0970-0536).

Background

The approved SRAE PAS information collection includes (1) grantee-, provider-, and program-level measures of SRAE program structure and delivery and (2) measures grantees collect through participant entry and exit surveys. The approved submission included four data collection instruments:

Instrument #1: Participant entry survey

Instrument #2: Participant exit survey

Instrument #3: Performance reporting system data entry form

Instrument #4: Sub-awardee data collection and reporting form

Based on initial feedback from grantees which resulted in requested changes from ACF leadership, we are proposing changes to the surveys, which are reflected in this nonsubstantive change request.

Overview of Requested Changes

ACF is requesting approval for the following revisions to the data collection:

- 1. Two Versions of the Entry and Exit Surveys (Instruments #1 and #2)
 - O We have developed a version of the entry and exit surveys that excludes some of the more sensitive items. This version of the surveys would be available for use with youth in middle school age groups. These are labeled Instruments #1a and #2a.
 - Instrument #1a: Removed items on sexual activity and incidence of pregnancy (Questions #13 through #18 in the original version of the entry survey).
 - Instrument #2a: Removed items on participants' perceptions of SRAE's influence on their plans to abstain from sexual intercourse and the

importance of various reasons in their decision to not have sexual intercourse (Questions #14 and #15 in the original version of the exit survey)

- O We will use the original version of the entry and exit surveys with high school and older age groups, with the following updates. These are labeled Instruments #1 and #2.
 - Instrument #1: Deleted younger ages in Question #1, deleted younger grades and adds an additional response category in Question #2, deleted Question #6 on sexual orientation, and added a response category to Question #8 on living situation.
 - Instrument #2: Deleted younger ages in Question #1, deleted younger grades and added a category to Question #2, deleted Question #6 on sexual orientation, and added a response category to Question #8 on living situation.
- 2. Edits to Questions Across All Entry and Exit Surveys
 - O Deleted Question #6 in both versions of the entry and exit surveys.
 - O Added a response category to Question #8 in both versions of the entry and exit surveys.
- 3. Edits to Instrument #3 (Performance reporting system data form)
 - o The current version of Instrument #3 includes not only (1) grantee-, provider-, and program-level measures of SRAE program structure and delivery, but also (2) program-level measures based on the participant entry and exit surveys included as Instruments #1 and #2. However, because grantees are submitting individual-level survey data, we can easily aggregate these data to the program level, thereby eliminating a step for the grantees. Therefore, grantees will not be required to also report the survey-based measures at the program level. Revisions were made to reflect this change.
- 4. Revisions to Instrument #4 (Subawardee Data Collection Reporting Form)
 - O Revisions were made to reflect submission of individual-level data across all sites.

Time Sensitivities

ACF requests approval by the end of May 2020. Many SRAE programs are implemented in schools, and new cohorts of youth often begin receiving programming at the start of the school year. Late May approval would give SRAE grantees time to obtain any approvals from school districts and institutional review boards that are needed before implementing the performance measures in August 2020.