

**To:** Jordan Cohen  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

**From:** Caryn Blitz and Selma Caal  
Office of Planning, Research and Evaluation (OPRE)  
Administration for Children and Families (ACF)

**Date:** August 10, 2020

**Subject:** Non-Substantive Change Request – Sexual Risk Avoidance Education Program (SRAE) Performance Analysis Study (PAS) (OMB #0970-0536)

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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:<sup>1</sup>

**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

OMB approved the information collection in October 2019, and SRAE grantees began collecting some measures in January 2020. Since then, COVID-19 and related social distancing requirements have changed the circumstances in which SRAE programs operate, and the approved measures do not adequately capture the resulting changes in SRAE programming.

### ***Overview of Requested Changes***

Due to issues related to COVID-19 and social distancing, many SRAE providers have been unable to provide programming to youth in person during the past several months. ACF would like to understand how providers have responded to these circumstances, including ending programming or shifting the mode of program delivery to an online platform. ACF is requesting approval for the following revisions to Instruments 3 and 4:

- Add grantee-level measures on:
  - Interruptions of SRAE operations or services due to COVID-19
  - Changes in staffing due to COVID-19

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<sup>1</sup> [There are two versions of Instruments 1 and 2: one for middle school youth and one for high school and older youth.](#)

- Add program-level measures on number of youth participants before and after mandatory closings due to COVID-19, overall and by setting
- Revise the existing measures of program setting to include *online* as a separate category (rather than including it in the *other* category)
- Add cohort-level items on:
  - Whether programming ended prematurely due to COVID-19 and, if so, the number of intended hours completed before this happened
  - Whether programming shifted from in person to online and, if so, the percentage of participants who made this shift

We do not request any changes to Instruments 1 or 2.

Due to the proposed changes to Instruments #3 and #4, we expect the annual burden to increase by 3,765 hours. Table 1 shows the currently approved burden, with the estimated increase for Instruments 3 and 4 in track changes.

**Table 1. Revised Burden Estimates**

Instrument	Type of Respondent	Total Number of Respondents	Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage <sup>a</sup>	Total Annual Cost
1.Participant Entry Survey	DSRAE	161,916	53,972	1	0.1333	7195	\$7.25	\$5,220
	SSRAE	1,108,456	369,485	1	0.1333	49,252	\$7.25	\$35,706
	CSRAE	29,108	9,703	1	0.1333	1,293	\$7.25	\$935
Totals for Participant Entry Survey		1,299,480	433,160	1	0.1333	57,740	\$7.25	\$41,861
2.Participant Exit Survey	DSRAE	129,948	43,316	1	0.2667	11,552	\$7.25	\$8,374
	SSRAE	886,768	295,589	1	0.2667	78,834	\$7.25	\$57,152
	CSRAE	22,871	7,624	1	0.2667	2033	\$7.25	\$1,472
Totals for Participant Exit Survey		1,039,584	346,528	1	0.2667	92,419	\$7.25	\$66,998
3.Performance Reporting Data Entry Form (Record-keeping)	DSRAE	150	50	2	17	1,700	\$23.69	\$40,273
	SSRAE	117	39	2	17	1,326	\$23.69	\$31,413
	CSRAE	144	48	2	17	1,632	\$23.69	\$38,662
Totals for Performance Reporting Data Entry Form		411	137	2	17	4,658	\$23.69	\$110,348
4.Subawardee	DSRAE	3,450	1,150	2	13.75	31,625	\$23.69	\$749,196

Data Collection and Reporting Form (Record-keeping)	SSRAE	2,700	900	2	13.75	24,750	\$23.69	\$586,328
	CSRAE	831	277	2	13.75	7,618	\$23.69	\$180,459 <sup>b</sup>
Totals for Subawardee Data Collection and Reporting Form		6,981	2,327	2	13.75	63,993	\$23.69	\$1,515,982 <sup>b</sup>
<b>Estimated Annual Burden Total</b>						<b>218,810<sup>c</sup></b>	<b>Estimated Total Annual Cost</b>	<b>\$1,735,189<sup>c</sup></b>

<sup>a</sup> For Instruments 1 and 2, calculations of average hourly wage are based on the 10% of respondents over 18 years. Average Hourly Wage for Wage for Youth over 18 is the Federal Minimum Wage, US Department of Labor: <https://www.bls.gov/cps/cpsaat44.pdf>. For Instruments 3 and 4, the hourly wage rate represents the mean hourly wage rate for community and social service occupations (\$23.69) (National Occupational Employment and Wage Estimates, Bureau of Labor Statistics, Department of Labor, May 2018).

<sup>b</sup> Differences between this value and the computed values based on the previous two columns are due to rounding.

<sup>c</sup> Differences between this value and the computed sum of the values above are due to rounding.

### ***Time Sensitivities***

ACF requests approval as soon as possible, so grantees can submit data on these revised measures during the next data submission period, which will begin in mid-August.