**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:** December 28, 2020

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

This memo requests approval of nonsubstantive changes to the approved information collection, Sexual Risk Avoidance Education Program 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:[[1]](#footnote-1)

Instrument 1: Participant entry survey

Instrument 2: Participant exit survey

Instrument 3: Performance reporting system data entry form -- grantees

Instrument 4: Subrecipient data collection and reporting form -- subrecipients

OMB originally approved the information collection in October 2019, and SRAE grantees began collecting some measures in January 2020. In August 2020, OMB approved a nonsubstantive change request for Instruments 3 and 4 to capture changes in SRAE programming resulting from the COVID-19 public health emergency and related social distancing requirements.

Because the recently approved changes assessed the extent to which COVID immediately impacted program delivery and data collection during the 2019-2020 reporting period, they are not all relevant for the next round of data submission. ACF would like to remove some questions and revise others to understand the extent to which grantees’ responses to the COVID-19 public health emergency have persisted or changed as grantees have adjusted to continued operations during a pandemic. In addition, the ACF office of Grants Management has requested us to replace the term “subawardee” with the term “subrecipient” in all performance measures data collection documents.

***Overview of Requested Changes***

ACF is requesting approval for the following revisions to Instruments 3 and 4:

1. Proposed modifications, deletions, and additions related to programming:

* Modify grantee-level measures to separately report on interruptions of SRAE administrative operations and services to youth due to COVID-19.
* Modify measures on changes to staffing due to COVID-19 to capture instead the number of staffing vacancies due to COVID-19 at any time during the reporting period and the number of those vacancies filled by the end of the reporting period.
* Modify measures on administrative staff to separate grantee-level administrative staff from provider-level administrative staff.
* Add a program-level measure on whether programming was delivered virtually.
* Drop measures of the number of youth participants before and since COVID-19 began.
  + Drop cohort-level measures related to COVID-19 (whether programming ended prematurely due to COVID-19, the number of program hours that had been delivered, whether programming shifted to online, and the percentage of participants who shifted to online programming).

1. Proposed additions of program-level measures related to the administration of participant entry and exit surveys:
   * The number of respondents for each version of the survey.
   * Whether the program received approval from its Federal Project Officer for a delay in survey data collection or a waiver for any survey item(s).
   * Whether the program was unable to collect survey data due to COVID-19 at any time during the reporting period.
   * The mode(s) of survey data collection.

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

We have also updated the burden estimates to reflect an increase in the number of SRAE grantees awarded funding in 2020. However, we expect the annual burden to decrease by 446 hours, due to the proposed revisions. Table 1 shows the currently approved burden, with the estimated decrease for Instruments 3 and 4.

**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 Wagea | 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 | 309~~150~~ | 103~~50~~ | 2 | 16.5~~17~~ | 3,399 ~~1,700~~ | $23.69 | $80,522 ~~40,273~~ |
| SSRAE | 111~~117~~ | 37~~39~~ | 2 | 16.5~~17~~ | 1,221 ~~1,326~~ | $23.69 | $28,925 ~~31,413~~ |
| CSRAE | 111~~144~~ | 37~~48~~ | 2 | 16.5~~17~~ | 1,221 ~~1,632~~ | $23.69 | $28,925 ~~38,662~~ |
| Totals for Performance Reporting Data Entry Form | | 531~~411~~ | 177~~137~~ | 2 | 16.5~~17~~ | 5,841 ~~4,658~~ | $23.69 | $138,373 ~~110,348~~ |
| 4.Subrecipient~~awardee~~ Data Collection and Reporting Form (Record-keeping) | DSRAE | 3,450 | 1,150 | 2 | 13.4~~13.75~~ | 30,820 ~~31,625~~ | $23.69 | $730,126 ~~749,196~~ |
| SSRAE | 2,700 | 900 | 2 | 13.4~~13.75~~ | 24,120 ~~24,750~~ | $23.69 | $571,403 ~~586,328~~ |
| CSRAE | 831 | 277 | 2 | 13.4~~13.75~~ | 7,424 ~~7,618~~ | $23.69 | $175,865 ~~180,459~~b |
| Totals for Subrecipient~~awardee~~ Data Collection and Reporting Form | | 6,981 | 2,327 | 2 | 13.4~~13.75~~ | 62,364 ~~63,993~~ | $23.69 | $1,477,~~3941,515,982~~~~b~~ |
| **Estimated Annual Burden Total** | | | | | | **218,364 ~~218,810~~**c |  | **$1,724,626 ~~1,735,189~~c** |

a 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).

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

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

***Time Sensitivities***

ACF requests approval by January 8, 2020, so grantees can submit data on these revised measures during the next data submission period, which will begin in late January 2021.

1. There are two versions of Instruments 1 and 2: one for middle school youth and one for high school and older youth. [↑](#footnote-ref-1)