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Office of Management and Budget (OMB)

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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)

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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:<sup>1</sup>

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***

<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.

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).
  
2. 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 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
	DSRAE	309,150	103,500	2	16.517	3,399 1,700	\$23.69	\$80,522 40,273
	SSRAE	111,117	37,390	2	16.517	1,221 1,326	\$23.69	\$28,925 31,413
	CSRAE	111,144	37,480	2	16.517	1,221 1,632	\$23.69	\$28,925 38,662
Totals for Performance Reporting Data Entry Form		531,411	177,137	2	16.517	5,841 4,658	\$23.69	\$138,373 110,348
	DSRAE	3,450	1,150	2	13.413-75	30,820 31,625	\$23.69	\$730,126 749,196
	SSRAE	2,700	900	2	13.413-75	24,120 24,750	\$23.69	\$571,403 586,328
	CSRAE	831	277	2	13.413-75	7,424 7,618	\$23.69	\$175,865 180,459 <sup>b</sup>
Totals for Subrecipient/awardee Data Collection and Reporting Form		6,981	2,327	2	13.413-75	62,364 63,993	\$23.69	\$1,477,394 1,515,982 <sup>b</sup>
<b>Estimated Annual Burden Total</b>						<b>218,364</b> <b>218,810<sup>c</sup></b>		<b>\$1,724,626</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 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.