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Office of Management and Budget (OMB)

From: Caryn Blitz
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Administration for Children and Families (ACF)

Date: December 28, 2020

Subject: Nonsubstantive Change Request – Personal Responsibility Education Program (PREP) – Performance Measures and Adulthood Preparation Subjects (PMAPS) (OMB #0970-0497)

This memo requests approval of nonsubstantive changes to the approved information collection, Personal Responsibility Education Program (PREP) – Performance Measures and Adulthood Preparation Subjects (PMAPS) (OMB #0970-0497).

Background

The approved PREP PMAPS information collection includes (1) grantee-, provider-, and program-level measures of PREP 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 form – grantees

Instrument 4: Performance reporting system data form – subrecipients

OMB originally approved the information collection in April 2017 and approved a request for a data collection extension in June 2020. In August 2020, OMB approved a nonsubstantive change request for Instruments 3 and Instrument 4. The changes included adding items that addressed the extent to which the COVID-19 public health emergency resulted in interruptions in programming or in providers shifting their mode of program delivery and/or their collection of youth participant entry and exit surveys.

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 requests approval for the following revisions to Instruments 3 and 4:

1. Proposed modifications, deletions, and additions related to programming:
 - Drop measures that request the number of youth participants before and since COVID-19 occurred.
 - Drop cohort-level measures related to COVID-19 (whether PREP 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).
 - Add a program-level measure on whether programming was delivered virtually.
 - Modify grantee-level measures to separately report on interruptions of PREP administrative operations and services to youth due to COVID-19.
 - Modify measures on administrative staff to separate grantee-level administrative staff from provider-level administrative staff.
 - 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.

2. Proposed modifications and deletions related to the administration of the participant entry and exit surveys:
 - 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).
 - Modify the measure on whether the program had to stop collecting entry or exit survey data due to COVID-19 to ask whether the program was unable to collect data at any point during the reporting period due to COVID-19.
 - Drop the measure on whether the program changed its mode of data collection due to COVID-19.
 - Modify the measure on modes of data collection to be reported for all programs, not only those that changed their data collection mode due to COVID-19.
 - Drop measures on how many youth completed the surveys using the intended mode of data collection and how many youth completed the surveys using an alternative mode of data collection due to COVID-19.

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

The proposed changes to Instruments 3 and 4 will reduce the burden for respondents. In addition, we have revised the burden table to reflect minor changes in the numbers of PREP grantees and subrecipients. The combination of these changes decreases the expected annual burden by 1,298 hours. Table 1 shows the currently approved burden with the estimated decrease for Instruments #3 and #4 in track changes (new numbers and information are in red):

Table 1. Revised Burden Estimates

Instrument	No. of Respondents (total over request period) ^a	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate ^b	Total Annual Respondent Cost ^c
Participant Entry Survey (all versions)	319,673	1	0.15	47,951	15,984	\$7.25	\$9,039
Participant Exit Survey (all versions)	291,624	1	0.13333	38,882	12,961	\$7.25	\$7,329
Performance reporting system data form - State grantees	51	6	18.5 19	5,661 5,814	1,887 1,938	\$24.98	\$47,137 \$48,411
Performance reporting system data form - TPREP grantees	8 9	6	18.38 18.75	882 1,013	294 338	\$24.98	\$7,344 \$8,433
Performance reporting system data form - CPREP grantees	21 25	6	14.5 15	1,827 2,250	609 750	\$23.69	\$14,427 \$17,768
Performance reporting system data form - PREIS grantees	12 13	6	14.38 14.75	1,035 1,151	345 384	\$23.69	\$8,173 \$9,097
Performance reporting system data form - State subrecipients	303 329	6	14.38 14.75	26,143 29,117	8,714 9,706	\$23.69	\$206,435 \$229,935
Performance reporting system data form - TPREP subrecipients	27 28	6	14.25 14.5	2,309 2,436	770 812	\$23.69	\$18,241 \$19,236
Performance reporting system data form - CPREP subrecipients	40 37	6	12.38 12.75	2,971 2,831	990 944	\$23.69	\$23,453 \$22,363
Performance reporting system data form - PREIS subrecipients	21 22	6	12.25 12.5	1,544 1,650	515 550	\$23.69	\$12,200 \$13,030
Total				129,205 133,095	43,069 44,367		\$353,778 ^d \$384,641

^a The estimated numbers of grantees and subrecipients have been updated to reflect the numbers observed through the 2019-2020 PMAPS performance measures data collection.

^b For Instruments 1 and 2, the cost to respondents is estimated by assuming that 7.8 percent of the youth served by grantees will be age 18 or older, and then assigning a value to their time of \$7.25 per hour, the federal minimum wage. The estimate of the proportion of youth served by PREP programs that will be 18 or older is based on previous performance measures data collection.

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

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

Time Sensitivities

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