TO: Jordan Cohen

Office of Information and Regulatory Affairs (OIRA)

Office of Management and Budget (OMB)

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DATE: October 18, 2021

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. OMB originally approved the information collection in October 2019 and has approved three nonsubstantive change requests since then. The currently approved instruments include the following:

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

The Family and Youth Services Bureau (FYSB) embarked on revising the performance measures collected through the SRAE participant entry (Instrument #1) and exit surveys (Instrument #2) to (1) ensure that all items directly align with legislation, (2) reduce the number of items that some grantees might consider sensitive, (3) reduce burden, and (4) improve clarity. This review and the resulting updates were completed because some questions added by the last administration either did not reflect the program legislation and/or were not helpful to inform program improvement.

In addition, we are proposing to reduce the number of pandemic-related measures in Instruments #3 and #4. The effects of the pandemic on SRAE programs have diminished as schools reopened and other pandemic restrictions lessened. As a result, many of the pandemic-related measures are less relevant, so we propose reducing them to only a few measures on the pandemic's lingering effects. Streamlining this set of measures will also reduce burden of the data collection.

An additional factor motivating the revisions to all instruments is that the timing for implementation of the revised performance measures coincides with new cohorts of FY2022

SRAE grantees whose awards begin in October 2021. The proposed changes to the data collection materials are detailed below.

Overview of Requested Changes

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

- 1. Add two additional versions of the entry and exit surveys (Instruments #1 and #2). Currently, there are two versions of each instrument. The additional versions (Instruments 1b, 1c, 2b, and 2c) only include a limited number of questions at Entry and Exit to decrease burden due to grantees' participation in evaluation studies, which often include extensive surveys. These changes result in the following versions of the entry and exit surveys:
 - O Instrument 1: Entry survey for high school and older youth (existing version)
 - O Instrument 1a: Entry survey for middle school youth (existing version)
 - O Instrument 1b: Entry survey for high school and older youth in programs with impact evaluations (new version)
 - O Instrument 1c: Entry survey for middle school youth in programs with impact evaluations (new version)
 - O Instrument 2: Exit survey for high school and older youth (existing version)
 - O Instrument 2a: Exit survey for middle school youth (existing version)
 - O Instrument 2b: Exit survey for high school and older youth in programs with impact evaluations (new version)
 - O Instrument 2c: Exit survey for middle school youth in programs with impact evaluations (new version)
- 2. Revisions to questions in entry and exit surveys¹
 - O Added an "Other (specify)" response category to question on race.
 - O Simplified the wording of some response categories in the question on residence type
 - Reduced the number of sub-questions in several items on behaviors (at entry) and perceived program effects on behaviors (at exit) and streamlined wording in some other sub-questions
 - o Combined two response categories in the question on reasons for abstaining
 - O Removed exit survey questions on bullying in the program
- 3. Revising Instrument #3 (Performance reporting system data form) to include only four items related to changes resulting from the COVID-19 pandemic. (The previous version of Instrument #3 included 17 items on this topic.)

¹ Changes are proposed for all versions of Instruments #1 and #2 that contain the question.

4. Revising Instrument #4 (Subrecipient Data Collection Reporting Form) to reflect the reduction in the number of items related to the COVID-19 pandemic.

These changes are not expected to greatly impact the data and usability of the data already collected. For the most part, items have been deleted. The minor edits to wording and response categories will still allow us to compare to previous data. Finally, the new cohorts of SRAE grantees will collect data for the first time.

The proposed changes to the instruments will reduce the burden hours for respondents. In addition, we have revised the burden table in Supporting Statement A to reflect revised estimates of the numbers of SRAE grantees (from 177 to 192), subrecipients (from 2,327 to 741), and participants. We have also updated the table to reflect the latest wage rates based on the National Occupational Employment and Wage Estimates from the Bureau of Labor Statistics from May 2020. The combination of these changes decreases the expected annual burden by 97,121 hours. We have updated the burden table in Supporting Statement A to reflect these changes.

Time Sensitivities

ACF requests approval by the end of October 2021 to give SRAE grantees time to obtain any necessary approvals from school districts and institutional review boards before beginning to collect the revised performance measures in January 2022.