Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC) National Needs Assessment

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

June 2021

Submitted by:

Families and Youth Service Bureau

Administration for Children and Families

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**A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for the Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC) National Needs Assessment survey.

#### This proposed information collection meets the following goals of ACF’s generic clearance for formative data collections for program support (0970-0531):

* Delivery of targeted assistance and workflows related to program implementation or the development or refinement of program and grantee processes, and the development and refinement of recordkeeping and communication systems.
* Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).
* Development of learning agendas and research priorities.

#### *Background*

RHYTTAC is responsible for assisting organizations in developing and implementing effective approaches to serve young people experiencing homelessness or are at-risk of experiencing homelessness. To meet this responsibility, RHYTTAC provides direct capacity building support for programs, delivers timely and relevant T/TA, and develops tools and resources for grantees. To be effective, RHYTTAC needs to be aware of the changing needs and demands of grantees to serve youth, so that the tools, resources, and trainings developed meet their need. The most comprehensive and efficient way to identify the needs of the grantees across the country is to administer a National Needs Assessment survey that asks questions about trainings and topics that are most relevant to their programs and those in which grantees are looking for T/TA. The Family and Youth Services Bureau (FYSB) RHYTTAC’s National Needs Assessment would be administered to all FYSB Runaway and Homeless Youth (RHY) grantees annually to fulfill this need. This survey should be administered annually to account for evolving needs of grantees.

#### *Legal or Administrative Requirements that Necessitate the Collection*

There are no legal or administrative requirements that necessitate the collection of this information. The ACF is undertaking the collection at the discretion of the agency.

**A2. Purpose of Survey and Data Collection Procedures**

***Overview of Purpose and Approach***

The National Needs Assessment survey is intended to provide FYSB RHY grantees an opportunity to share with RHYTTAC and FYSB their T/TA needs. RHYTTAC and FYSB will use the results of the survey to identify priorities for RHYTTAC T/TA events for the following year, as well inform the agenda for the annual RHY National Training event. The results of the survey will be will be used for internal purposed to inform event planning, They will also be shared publicly with RHY grantees so that they may understand where their needs fit within the national context and, importantly, so they understand their input was received, noted, and will be used to guide future TTA events . The survey is administered through an online survey sent to all FYSB RHY grantees.

***Questions***

The survey will ask grantees background information about their organization, the RHYTTAC events used in the past year, and topical training needs, organized around the United States Interagency Council on Homelessness (USICH) four core outcome areas, as well as some cross cutting topics. The survey will also ask about which assessments and evidence-based and evidence-informed practices an organization utilizes, and their training needs around them. Additionally, this year’s survey will ask grantees about training needs during and emerging from the COVID-19 pandemic. While the core of the survey will remain unchanged each year, additional sections may be added or removed each year to account for events that may impact all grantees (i.e. operating during a global pandemic). Future surveys will be submitted for review and approval.

**A3. Improved Information Technology to Reduce Burden**

RHY grantees will be asked to complete only one survey per organization. To ensure the training needs are representative of the entire organization and not solely the individual completing the survey, we have drafted messaging and offer support to guide organizations through this process. We will create a video that explains the survey, its purpose and how results will be used, as well as how to effectively gather the organization’s responses with minimal burden. Following the launch of the survey, we will host an online “office hour” to answer any questions that grantees may have as they prepare to complete the survey.

**A4. Efforts to Identify Duplication**

There is no other source for the information requested through this survey.

**A5. Involvement of Small Organizations**

All FYSB RHY grantees will be asked to complete the survey, including those who qualify as a small business under the U.S. Small Business Association’s size standards for organizations in Child and Youth Services industry.[[1]](#footnote-1) The survey has been designed to impose minimal burden on grantees and is intended to improve services provided to grantees.

**A6. Consequences of Less Frequent Data Collection**

The National Needs Assessment is an annual survey that will inform the development of T/TA for the following year. By conducting the survey annually instead of once a grant period, we are able to add and remove certain time sensitive sections, such as the questions around training needs for programs operating in a pandemic that are included this year, and be more responsive to organizations’ needs.

**A7. Special Circumstances**

There are no special circumstances for the proposed data collection efforts.

**A8. Federal Register Notice and Consultation**

***Federal Register Notice and Comments***

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of the overarching generic clearance for formative information collection. This notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. During the notice and comment periods, no substantive comments were received.

#### *Consultation with Experts Outside of the Study*

We are not conducting consultation with experts outside the study.

**A9. Incentives for Respondents**

No incentives for respondents are proposed for this information collection.

**A10. Privacy of Respondents**

Youth Collaboratory, the RHYTTAC entity, has contracted with Chapin Hall at the University of Chicago to perform specific RHYTTAC activities, including conducting the National Needs Assessment. As specified in the contract between Chapin Hall and Youth Collaboratory, the Chapin Hall will protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

Further, Chapin Hall’s research data are stored on HITRUST Certified Red Hat Enterprise Linux servers. The servers are protected by a network firewall. Patches are regularly applied to and maintained on the servers. Access is limited to users with IRB approval and stated need. The principle of least privilege is followed—providing a user account only those privileges that are essential to perform its intended function. Security controls are regularly reviewed following NIST SP 800-53r4 guidelines to ensure that appropriate physical, administrative and technical controls are in place to guarantee confidentiality, integrity and availability of all data. Chapin Hall shall ensure that all of its employees who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. All researchers involved in the data collection and analysis have complete Collaborative Institute Training Initiative (CITI) Human Subjects Research training.

As specified in the evaluator’s contract, Chapin Hall shall use Federal Information Processing Standard compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. Chapin Hall shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard.  Chapin Hall shall: ensure that this standard is incorporated into their property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations.  No personally identifiable information will be collected in the study.

**A11. Sensitive Questions**

There are no sensitive questions contained in the proposed survey.

**A12. Estimation of Information Collection Burden**

**Total Burden Requested Under this Information Collection**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Instrument | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | Total/Annual Burden Hours | Average Hourly Wage | Total Annual Cost |
| Needs Assessment Survey | 360 | 1 | 0.5 | 180 | $45.54 | $8,197.20 |

***Total Annual Cost***

To calculate the annualized cost to respondents for the hour burden, we assume that the typical respondent will be community and social service providers. Based on data on our expected respondents from the Bureau of Labor Statistics, we use a mean hourly wage of $22.77.[[2]](#footnote-2) The wage rate was multiplied by 2 to account for fringe benefits and overhead for an average hourly wage of $45.54.

**A13. Cost Burden to Respondents or Record Keepers**

There are no additional costs to respondents.

**A14. Estimate of Cost to the Federal Government**

The total cost for the data collection activities under this current request will be $32,031. This includes direct and indirect costs of data collection.

**A15. Change in Burden**

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

**A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

The following is the current 2021 plan and time schedule, subject to change based on FYSB, OPRE, and OMB review period.

* Following OMB Approval: Launch survey and host online “office hour” to answer questions organizations may have about completing the survey
* 4 Weeks after Launching Survey: Close survey
* Summer 2021, after survey closes: Survey data analysis begins
* Fall 2021: Finalize report

**A17. Reasons Not to Display OMB Expiration Date**

All instruments will display the expiration date for OMB approval.

**A18. Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.

1. See <https://www.sba.gov/sites/default/files/2019-08/SBA%20Table%20of%20Size%20Standards_Effective%20Aug%2019%2C%202019_Rev.pdf> for table and guidelines. [↑](#footnote-ref-1)
2. The median annual wage for community and social service occupation in May 2020 was $47,520. This computes to an hourly wage of $22.77 (using the formula made permenent by the Consolidated Omnibus Budget Reconciliation Act of 1985 (Public Law 99-272, April 7, 1986) to divide the annual rate of pay by 2,087 hours.) Wage data from <https://www.bls.gov/ooh/community-and-social-service/home.htm>. [↑](#footnote-ref-2)