

To: Jordan Cohen
Office of Information and Regulatory Affairs (OIRA)
Office of Management and Budget (OMB)

From: Kathleen Dwyer and Alysia Blandon
Office of Planning, Research and Evaluation (OPRE)
Administration for Children and Families (ACF)

Date: October 12, 2021

Subject: Non-Substantive Change Request – Evaluation of LifeSet (OMB #0970-0577)

This memo requests approval of non-substantive changes to the approved information collection, Evaluation of LifeSet (OMB #0970-0577).

Background

LifeSet is a therapeutic case management program that provides youth and young adults leaving foster care, juvenile justice, and mental health systems with the intensive in-home support and guidance they need in the transition to adulthood. The current LifeSet evaluation has two main components: an impact study to assess the effects of program participation on outcomes of interest and an implementation study to describe and document how LifeSet is implemented in New Jersey. The study is intended to contribute to the evidence base on program models that support young adults in the transition out of foster care.

Project activities for the impact study include three waves of youth surveys and collection of administrative and program data. Project activities for the implementation study include interviews and focus groups with key staff and study youth. To date, the team has completed cognitive testing of the young adult study consent form (Appendix A) as discussed in Supporting Statement B4. The team has also begun random assignment of youth though no data has been collected.

In response to findings from the cognitive testing of the young adult consent form, we are requesting non-substantive changes to the baseline youth survey (Instrument 1), young adult consent form (Appendix A), youth assent form (Appendix B), and study fact sheets (Appendix E). These non-substantive changes will ensure that impact study participants are able to understand the informed consent materials.

Overview of Requested Changes

The following nonsubstantive changes do not alter the purpose of the data collection, the expected uses of the data, nor the burden estimates as approved by OMB in September 2021.

Readability and Comprehension Revisions

Cognitive testing suggested revisions were needed to improve readability and ensure participants' comprehension of the informed consent form. In particular, revisions were suggested to paragraph 4 of the consent related to the collection and use of administrative data. Requested changes include:

- Listing the types of data the study will request in a bulleted list,

- Using a numbered list to clearly communicate the ways the research team will use administrative data, and
- Providing plain language examples of the types of information that will be requested and how it will be used.

Other requested changes to the consent form include:

- Revising words that were not well understood by participants (e.g., “non-partisan” and “LexisNexis”),
- Replacing “survey” with “interview” throughout for consistency,
- Clarifying that participants will be asked to participate in three interviews over the course of the study, and
- Removing physical mailing addresses of the survey firm and IRB administrator as participants are most likely to use phone or email to contact these persons.

References to the meeting observation were also removed as it confused cognitive testing participants. The project team will propose a separate process to recruit and consent participants for meeting observations in a future information collection request.

Cognitive testing also suggested providing more detail in the study fact sheets (Appendix E) to ensure participants understand the limits of privacy. Specifically, requested revisions include:

- A statement that information about illegal behavior will be kept private, and
- Examples of to whom the research team will report exceptions to privacy protections (i.e., abuse or neglect, threatened harm).

Other requested revisions to the youth assent form (Appendix B) and the fact sheets (Appendix E) were made to align with similar revisions to the young adult consent form (Appendix A), as applicable.

Placement of Administrative Data Consent

We propose changing the placement of the administrative data consent statement from the beginning to the end of the baseline youth survey (Instrument 1). Cognitive testing suggested that some young adults may be more comfortable responding to the administrative data request at the end of the survey after building rapport with the interviewer. Building trust and rapport is a crucial part of engaging the study’s population. We request revising Instrument 1 so that participants are asked for consent to access their administrative data at the conclusion of the survey.

Time Sensitivities

This work is time sensitive. Random assignment began in August. The project team expects to execute a data use agreement with the New Jersey public child welfare agency in the next couple weeks that will allow the team to begin recruiting participants for the data collection.