Personal Responsibility Education Program (PREP) Local Evaluation Support

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A

March 2022

Submitted By:

Office of Planning, Research, and Evaluation

Administration for Children and Families

U.S. Department of Health and Human Services

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Project Officer:

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**Part A**

**Executive Summary**

* **Type of Request:** This Information Collection Request is for a generic information collection under the umbrella generic, Formative Data Collections for Program Support (0970-0531).
* **Description of Request:** This data collection will inform evaluation support to Personal Responsibility Education Program (PREP) Responsibility in Education Innovative Strategies program (PREIS) grantees for their local evaluations. This request includes local evaluation plan templates and an implementation plan template that will be used to summarize key information about grantees’ evaluation plans to provide targeted technical assistance for local evaluation planning purposes and subsequent technical assistance for local evaluations. None of the information collected will be made public or will be used as the principal basis for public policy decisions.
* **Time Sensitivity:** Grantees plan to start their individual local evaluations as early as August 2022. To ensure they can begin work and stay on schedule, they need to submit their complete draft evaluation plans to ACF beginning in June 2022. To allow ample time for evaluation plan development and refinement based on feedback from the local evaluation support provider, the project team needs to provide the OMB approved evaluation plan template to PREIS grantees and evaluators in March of 2022. PREIS grantees also must receive approval for the implementation plan template by as early as August 2022.

**A1**. **Necessity for Collection**

To improve the life course of adolescents and reduce the risks related to sexual activity, Congress first authorized the Personal Responsibility Education Program (PREP) as part of the 2010 Affordable Care Act. Section 513 of the Social Security Act (42 USC 713)--as amended by Section 50503 of the Bipartisan Budget Act of 2018 (Pub. L. No. 115-123) extended by Section 3822 of the CARES Act, 2020 (Pub. L. No. 116-136) authorizes funding for PREP grants, including PREP Responsibility in Education Innovative Strategies program (PREIS) grants. The legislation also mandates that the Secretary evaluate the programs and activities carried out with funds made available through PREP. PREIS funding supports the development of innovative strategies to prevent teen pregnancy for high-risk, vulnerable, and culturally underrepresented youth populations.

In accordance with grant requirements, grantees must plan and conduct their own local rigorous evaluations. In 2021, the Administration for Children and Families (ACF) contracted with Abt to provide evaluation support to PREP grantees and their local evaluators. The templates proposed in this request support this effort. The information garnered from this information collection is necessary to provide targeted technical assistance to grantees to ensure implementation and evaluation plans are rigorous and meet Standards of Rigor currently being developed for the PREIS grantees.

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

**A2**. **Purpose**

*Purpose and Use*

One of the main purposes of this information collection is to help PREIS grantees develop plans that meet Standards of Rigor laid out by the project team. The templates provide PREIS grantees with a systematic, comprehensive way of collecting information pertaining to grantees’ evaluations plans, including their research questions, data collection, methodology, and survey instruments.

Additionally, the implementation plan template will allow the ACF Family and Youth Services Bureau (FYSB) to understand how grantees are planning to implement their program, prior to programming start-up, to ensure grantees have a well-thought out, rigorous implementation plan, including how grantees’ plan to administer their programs, any proposed adaptations, and any anticipated challenges. The local evaluation support team and FYSB will be able to use the information to develop relevant and responsive technical assistance throughout the course of grantees’ evaluations. All information provided in the templates is for internal grantee and ACF use; there are no plans to share the information publicly.

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

* Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).
* Delivery of targeted assistance related to program implementation.

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker, and is not expected to meet the threshold of influential or highly influential scientific information.

*Guiding Questions*

The information being requested on the proposed templates is for program and evaluation monitoring and technical assistance only. There is no independent study being conducted using the information collected.

*Information Collection Plan*

The collection proposed is for PREIS grantees (12 grantees). Each grantee will be asked to complete the following two templates:

* **Local evaluation plan template for PREIS grantees:** Grantees will complete the template using the instructions as guidance, and then the project team (ACF and Abt) will review them and provide detailed feedback in order to help grantees strengthen the rigor of their plans. Once finalized, the information collected will serve as the grantees’ evaluation plan and will be referred to throughout the life course of the grant.
* **Implementation plan template for PREIS grantees:** Grantees will complete the template using the instructions as guidance, and then the project team will review them and provide detailed feedback and advice in order to help grantees strengthen their overall program implementation design. Once finalized, the information collected will serve as the grantees’ implementation plan and will be referred to throughout the life course of the grant.

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| --- | --- | --- | --- |
| *Data Collection Activity* | *Instruments* | *Respondent, Content, Purpose of Collection* | *Mode and Duration* |
| Documentation of PREIS grantee evaluation plans | PREIS Evaluation Plan Template and Guidance (Instrument 1) | **Respondents**: PREIS grantees and local evaluator staff**Content**: Components of their planned local evaluation, including research questions and methodology**Purpose**: To support grantees to develop rigorous evaluation plans and inform technical assistance | **Mode**: Written responses in a template (Word Document)**Duration**: 12 hours |
| Documentation of PREIS grantee implementation plans | PREIS Implementation Plan Template and Guidance (Instrument 2) | **Respondents**: PREIS grantees and local evaluator staff**Content**: Components of their planned program, including intended program delivery, adaptations anticipated, and challenges anticipated**Purpose**: To support grantees to develop strong implementation plans and inform technical assistance  | **Mode**: Written responses in a template (Word Document)**Duration**: 8 hours |

*Other Data Sources and Uses of Information*

Completed evaluation and implementation plan templates will inform evaluation TA efforts. The evaluation TA contractor and FYSB project officer also uses individual feedback from grantees and their evaluators to design evaluation TA.

**A3**. **Use of Information Technology to Reduce Burden**

ACF and its contractors will employ information technology as appropriate to reduce the burden of respondents who agree to participate. This data collection effort will make use of electronic templates for completion and electronic submission.

**A4**. **Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency**

There are no other sources of information that would allow us to assess the evaluation design or implementation plan of PREIS grantees. No unnecessary information is being requested. Templates were based on preexisting templates used by the government and were modified accordingly to improve the utility and efficiency of the government’s review of completed templates. Additionally, grantees may update information submitted as part of their grant application to help facilitate completing the template.

**A5**. **Impact on Small Businesses**

The potential exists for data collection activities to affect small entities associated with the grantee. PREIS evaluations may be led by local evaluators affiliated with small organizations. Proposed data collection efforts are designed to minimize the burden on all organizations involved, including small businesses and entities, by collecting only critical information through the use of standardized templates.

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

All grantees will need to complete the evaluation plan template at least once. Grantees will likely need to revise this template between two to four times based on feedback received from the project team, with two being the anticipated average number of revisions. Upon approval of the evaluation plans, grantees may need to submit minor updates to the plans throughout the life course of the grant to accommodate for changes to the approved evaluation design. If grantees do not submit revisions, ACF may not have final, full documentation of an evaluation plan that meets the Standards of Rigor. All grantees also need to complete the implementation plan template at least once. Grantees will likely need to revise the template between one to two times, with two being the average number of revisions.

**A7**. **Now subsumed under 2(b) above and 10 (below)**

**A8**. **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 two notices in the Federal Register announcing the agency’s intention to request an OMB review of the overarching generic clearance for formative information collection. The first notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. The second notice published on December 28, 2020, Volume 85, Number 248, page 84343, and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

#### *Consultation with Experts*

ACF consulted staff from Abt Associates, Inc., and their subcontractors, Child Trends and James Bell Associates when preparing the evaluation plan template. Additionally, several current grantees’ evaluators reviewed and provided feedback on the PREIS template, as a part of their participation in the PREIS Grantee Steering Committee. See below for a list of individuals consulted.

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| --- | --- |
| **Name** | **Organization** |
| Cindy Walker | Consultant to AMTC & Associates |
| Jordan Nelon  | Centerstone |
| Ashley Raphael Cole | Gang Alternative, Inc. |
| Carly Raasch | Education, Training, and Research Associates (ETR) |
| Catie Henley | The Policy & Research Group  |
| Siri Warkentien  | RTI International |
| Seow Ling Ong  | Education, Training, and Research Associates (ETR) |
| Andrew Warnke  | Evaluation Strategies |

**A9**. **Tokens of Appreciation**

No tokens of appreciation are proposed for this information collection.

**A10**. **Privacy: Procedures to protect privacy of information, while maximizing data sharing**

*Personally Identifiable Information*

The templates ask for information on organizational and individual roles and responsibilities related to program evaluation. Specific staff members may be listed by name in order to have a clear organizational chart depicting who is responsible for what program/evaluation activities.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals’ personal identifier.

*Assurances of Privacy*

As specified in the contract, Abt Associates shall protect grantee privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. Grantees will be informed about the plans on how the data will be used, and that their information will be kept private to the extent permitted by law.

*Data Security and Monitoring*

As specified in the contract, Abt Associates, Inc. shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. The Contractor has a documented Data Security Plan (DSP) in place that will be updated as needed throughout the life of the contract. All data, including portable media (e.g., voice/video recordings) and computerized files, are kept in secure areas.

Grantees will submit their completed evaluation plan template via email, which will be saved in secure project files. We do not intend to disseminate any information collected via this template.

**A11**. **Sensitive Information** [[1]](#footnote-2)

There are no sensitive questions in this data collection.

**A12**. **Burden**

*Explanation of Burden Estimates*

The burden table provides the estimated annual reporting burden calculations for the two templates included in this request.

Assumptions are as follows:

**PREIS Evaluation Plan Template**: A maximum of 12 PREIS grantees will complete the Evaluation Plan Template. We expect grantees will need about 12 hours to complete the Evaluation Plan Template, including hours needed for drafting the initial evaluation plan based on the template (8hrs), hours needed for revising the evaluation plan based on feedback received from ACF (2hrs), and hours needed to update the evaluation plan after evaluation activities have begun (2hrs).

**PREIS Implementation Plan Template**: A maximum of 12 PREIS grantees will complete the Implementation Plan Template. We expect grantees will need about 8 hours to complete the Implementation Plan Template, including hours needed for drafting the initial implementation plan based on the template (6hrs), hours needed for revising the implementation plan based on feedback received from ACF (1hr), and hours needed to update the implementation plan after program activities begun (1hr).

*Estimated Annualized Cost to Respondents*

The total annual burden cost is estimated to be $2,890.40. For all cost calculations, we estimate the average hourly wage for program directors and managers to be the average hourly wage for “Social and Community Services Manager” ($36.13), taken from the U.S. Bureau of Labor Statistics, Occupational Employment Statistics, 2020.

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| Instrument  | No. of Respondents (total over request period) | 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 | Total Annual Respondent Cost |
| PREIS Evaluation Plan Template  | 12 | 1 | 12 | 144  | 48  | $36.13 | $1,734.24  |
| PREIS Implementation Plan Template | 12 | 1 | 8 | 96  | 32  | $36.13 | $1,156.16 |
| Totals |  |  |  | 240  | 80  |  | $2,890.40  |

**A13**. **Costs**

There are no additional costs to respondents.

**A14**. **Estimated Annualized Costs to the Federal Government**

The table below shows the estimated annual costs to the Federal government for the data collection activities following approval from OMB.

|  |  |
| --- | --- |
| **Cost Category** | **Estimated Costs** |
| Field Work | $187,882  |
| Publications/Dissemination | $0 |
| **Total costs over the request period** | $187,882  |
| **Annual costs** | $62,627.33 |

**A15**. **Reasons for changes in burden**

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

**A16**. **Timeline**

As soon as the Evaluation Plan and the Implementation Plan Templates are approved by OMB, we will share the templates with PREIS grantees, so they can begin to complete use them as resources. The goal is to distribute templates in March and April 2022.

PREIS grantees are required to submit a complete evaluation plan and implementation plan draft to FYSB starting in June 2022. Our local evaluation support liaisons will provide technical assistance and guidance to help grantees and evaluators complete the evaluation plan templates. PREIS project officers will provide technical assistance and guidance to help grantees complete the implementation plan templates. Evaluation plans will be approved on a rolling basis by FYSB between September 2022 and March 2023

The umbrella generic currently has an expiration date of July 31, 2022. When ACF requests an extension for the umbrella generic, we will include this information collection in that request to extend approval and cover data collection into 2023.

**A17**. **Exceptions**

No exceptions are necessary for this information collection.

**Attachments**

* Appendix A: Synopsis of the PREIS Evaluation Plan Template and Guidance
* Instrument 1: PREIS Evaluation Plan Template and Guidance
* Instrument 2: PREIS Implementation Plan Template and Guidance
1. Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status. [↑](#footnote-ref-2)