

TO: Kelsi Feltz  
Office of Information and Regulatory Affairs (OIRA)  
Office of Management and Budget (OMB)

FROM: Caryn Blitz and Tia Brown  
Office of Planning, Research, and Evaluation (OPRE)  
Administration for Children and Families (ACF)

DATE: December 13, 2024

SUBJECT: Non-Substantive Change Request - Administration for Children and Families  
Youth Programs – Sexual Orientation and Gender Identity (SOGI) Items – Pre-  
Testing of Data Collection Activities (OMB #0970-0355).

This memo requests approval of non-substantive changes to the information collection, Administration for Children and Families Youth Programs – Sexual Orientation and Gender Identity (SOGI) Items, approved under the Pre-Testing of Data Collection Activities Umbrella Generic (OMB #0970-0355).

### ***Background***

As part of an agency-wide initiative to identify SOGI items for youth, the Administration for Children and Families (ACF) is beginning a process of gathering feedback on potential SOGI questions for youth. Additionally, ACF is currently engaged in efforts to improve the information collections that support the Personal Responsibility Education Program (PREP) Performance Measures (approved under OMB #: 0970-0497) and surveys approved for the PREP Sexual Risk Avoidance Education Program Performance Analysis Study (SRAE PAS) (OMB #0970-0536). OMB approved the information collection in November 2024. The currently approved instruments and Appendices include the following:

**Instrument #1:** Youth Screener for Cognitive Interviews

**Instrument #2:** Cognitive Interview and Focus Group Protocol

**Appendix A:** Outreach Materials

**Appendix B:** Consent and Assent Forms

Based on feedback from the contractor’s Internal Review Board, we propose minor changes to the consent and assent forms. In addition, updates to information in the supporting statements are needed to reflect changes in the honorarium amount to youth with lived experience and to add information about honoraria to sites assisting with recruitment of focus group participants.

### ***Overview of Requested Changes***

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

1. Revisions to language in the Youth Assent form
  - o Added “[VIRTUAL ONLY: You will be asked to complete a short screener

questionnaire to help us determine whether you qualify to participate in the study and help us place you in a group for discussion.]”

- Added “If you’d like, during the group discussion, you can give us a fake name instead of your real name. However, you must sign your real name on this form.”
- Deleted “There are no know risks associated with this research.”
- Replaced “token of appreciation” with “honorarium”.
- Deleted “audio” and added “If anyone participating in you group does not want to be recorded, we will not record the session.”
- Added Survey Director telephone number and IRB telephone number.

## 2. Revisions to the language in the Parent Consent form

- Added “[VIRTUAL ONLY: Your child will be asked to complete a short screener questionnaire to help us determine whether they qualify to participate in the study and help us place them in a group for discussion.]
- Replaced “token of appreciation” with “honorarium”.
- Added “During the group discussion, your child can provide a fake name if they so choose.”
- Added “VIRTUAL ONLY: The information your child provides as part of the screener questionnaire will be provided to Mathematica in a de-identified form, without their full name or contact information attached, and will be destroyed at the end of the project.]”
- Deleted “audio”.
- Added “If anyone participating in the group does not want to be recorded, we will not record the session.”
- Added Survey Director telephone number and IRB telephone number.

## 3. Revisions to SSA

- Changed “\$50” to \$75”.
- Added “We also propose offering a \$100 honorarium to sites that participate in the in-person focus groups in acknowledgment of their contribution to the study and their efforts to help coordinate the study activities.”

## 4. Revisions to SSB

- Replaced “the vendor” with or added “Canadian Viewpoint (CanView)” throughout.
- Replaced “SAGO” with “CanView”.
- Deleted “We propose collecting detailed racial/ethnic information to inform understanding of any regional differentiation in Spanish speaking youth’s interpretation of the items.”
- Replaced “Mathematica” with “The study”.
- Replaced “Spanish speaking” with “who speak a language other than English”.  
Replaced “Spanish” with “the youth’s primary language.”

These changes are not expected to greatly impact the usability of the data already collected or to be collected. For the most part, language has been clarified, the vendor name was updated, the honorarium was increase, and new site payments were included.

The proposed changes to the will not affect burden hours.

***Time Sensitivities***

ACF requests approval by the end of December 2024 so that data collection can begin as scheduled in early January 2025.