National Human Trafficking Training and Technical Assistance Center (NHTTAC) Evaluation Package

OMB Information Collection Request
0970 - 0519

Supporting Statement Part A - Justification

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Submitted By:
Office on Trafficking in Persons
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT PART A – JUSTIFICATION

Summary

This request is to extend approval with changes to an ongoing data collection under OMB Control Number 0970-0519. An overview of changes is provided in A15. OMB approval of the current National Human Trafficking Training and Technical Assistance Center (NHTTAC) Evaluation Package expires on March 31, 2023. If this information is not collected, vital feedback from recipients and partners on NHTTAC training and technical assistance (T/TA) services will be unavailable.

1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) serves as the lead U.S. Department of Health and Human Services agency to combat trafficking and modern forms of slavery by administering anti-trafficking programs through grants and contracts and collaborating with federal, tribal, state, and local governmental and nongovernmental organizations. The Office on Trafficking in Persons (OTIP), a federal agency within ACF, provides leadership over anti-trafficking programs and services under the purview of ACF, including implementation of authorities under the Trafficking Victims Protection Act of 2000, as amended; Preventing Sex Trafficking and Strengthening Families Act of 2014 (Pub. L. 113–183); Justice for Victims of Trafficking Act of 2015 (Pub. L. 114–22); and the Stop, Observe, Ask, and Respond (SOAR) to Health and Wellness Act of 2018 (Pub. L. 115–398).

In 2016, OTIP, with authority from the Trafficking Victims Protection Act of 2000 (Pub. L. 106–386), Section 106(b), as amended at 22 U.S. Code § 7104 and 22 U.S. Code § 7105(c)(4), established the National Human Trafficking Training and Technical Assistance Center (NHTTAC) to build the capacity of health and human services professionals and help prevent, identify, and respond to trafficking. This is an existing collection that allows NHTTAC to assess the ongoing training and technical assistance (T/TA) needs of health and human services professionals in preventing, identifying, and responding to trafficking, and to determine the level of satisfaction with services provided by NHTTAC. This package includes eight instruments to assist with a comprehensive evaluation of NHTTAC's T/TA events and associated efforts. This collection of information is necessary to enable NHTTAC to collect recipient and partner feedback in an efficient, timely manner and in accordance with OTIP's commitment to improving service delivery. The information collected from recipients and partners will help ensure that users have an effective, efficient, and satisfying experience with NHTTAC's T/TA services. This feedback provides insights into recipient or partner perceptions, expectations, and experiences; provides an early warning of issues with T/TA; and focuses attention on areas where communication, training, or changes in operations might improve the delivery of T/TA or the responsiveness of NHTTAC. These collections allow for ongoing, collaborative, and actionable communications between NHTTAC and its recipients and partners. It also allows feedback to contribute directly to the improvement of program management.

2. Purpose and Use of the Information Collection

On OTIP's behalf, the NHTTAC Evaluation Team, and designated partners, collect, analyze, and interpret information gathered through this information collection to identify strengths and weaknesses of NHTTAC's T/TA and associated efforts, make improvements based on this feedback, and identify the types of T/TA services needed. The solicitation of feedback will target areas such as timeliness, appropriateness, accuracy of information, courtesy, efficiency of T/TA delivery, knowledge and skill building, networking, and resolution of issues encountered while interacting with NHTTAC. Responses will be assessed to plan and inform efforts to improve or maintain the quality of T/TA offered to the public. An overview of the purpose and use of each form type under this collection follows.

Universal T/TA Participant Feedback

Individuals who participate in NHTTAC T/TA that is shorter in length (i.e., up to three hours)—including webinars, conferences, meetings, SOAR Tier I activities (i.e., SOAR *Online*, SOAR pilots, and live SOAR for Individuals), and other short-term T/TA—are asked to complete the Universal T/TA Participant Feedback Form upon completion of the T/TA. Participants are asked to provide feedback on their knowledge and skills built through the T/TA, satisfaction with the T/TA delivery, relevance to their work, and suggestions for improvements for future deliveries. SOAR Tier I participants seeking continuing education credit must complete the pre- and post-training tests, which are composed of the same questions, to receive credit.

Intensive T/TA Participant Feedback

Individuals who participate in NHTTAC's intensive T/TA offerings—including the Human Trafficking Leadership Academy (HTLA), HTLA follow-on T/TA, OTIP recipient T/TA, SOAR for Organizations, SOAR for Communities, and other specialized T/TA—are asked to complete the Intensive T/TA Pre-Training, Mid-Stream, and Post-Training Surveys. The Pre-Training Survey asks participants to provide their levels of knowledge and skill in the competencies to be taught through the T/TA, ability to apply NHTTAC's guiding principles in their work, and satisfaction with planning for the T/TA. The Mid-Stream Survey, to be deployed during the intensive T/TA, asks participants to provide ratings of readiness for the T/TA activities and provide open-ended feedback on improvements for the T/TA offerings. The Post-Training Survey, to be deployed following completion of the intensive T/TA, asks participants to provide their levels of knowledge and skill in the competencies taught through the T/TA, ability to apply NHTTAC's guiding principles in their work, satisfaction with the T/TA and facilitators, progress made on T/TA plan goals, and relevance to their work.

Follow-Up Feedback

Individuals who participate in NHTTAC's short-term and intensive T/TA offerings are asked to provide detailed feedback about outcomes in intervals of 3, 6, 9, or 12 months following completion of the T/TA. Participants are asked to provide feedback on their application of competencies, impact of the T/TA, and suggestions for follow-on support in the future.

Qualitative Guide

The Qualitative Guide is a consolidated list of questions for interviews, focus groups, and listening sessions. The guide contains questions about standard NHTTAC evaluation and special topics/projects, which allows for use in a variety of settings. The guide contains questions about experiences with T/TA, consultant feedback, equitable practices, grant programming, service provision, cultural responsiveness and accessibility, lived experience, trauma-informed care, peer support, and tools and resources. Potential audiences include short-term and intensive T/TA recipients; NHTTAC consultants; program support staff; service populations; and other practitioners and organizations in health care, behavioral health, public health, and social services.

Network Survey
Participants of intensive T/TA (e.g., HTLA, OTIP recipient T/TA, SOAR for Organizations, SOAR for Communities) are asked to provide feedback on workgroup and peer networks. Workgroup measures collect information on collaboration and coordination within a group of organizations or individuals on a common action area. Peer measures collect information on developing partnerships and coordination efforts of an individual that were a result of the T/TA.

Client Satisfaction Survey
The Client Satisfaction Survey is to be administered with T/TA participant organizations to collect perspectives from patients/service populations/clients. Feedback includes measuring satisfaction with services, helpful aspects of services, and areas of improvement for client/patient care. Should data already be collected by an organization, that data would be used in place of this survey for further analysis to inform T/TA plan goals, future offerings, and impact.

Resources Feedback
Individuals who access NHTTAC resources (e.g., NHTTAC Customer Support Center, NHTTAC website, NHTTAC tools) are asked to provide feedback on their experience using the resource, including reasons for obtaining the resource, satisfaction with the resource, and comments and suggestions.

Requester Feedback
Individuals who request T/TA (e.g., peer reviews, needs assessments) are asked to provide feedback following the T/TA. Requesters are asked to provide feedback on NHTTAC support, planning processes, recommendations made, and consultants.

In order to continue to meet the provisions of Pub. L. No. 115–398, the Stop, Observe, Ask, and Respond to Health and Wellness Act of 2018 (SOAR to Health and Wellness Act of 2018), NHTTAC has continued to expand the administration of SOAR each year; deeper measurements of the impact of these efforts are necessary. In addition, two performance measures required through the Government Performance and Results Act for the Agency are informed by information captured across all SOAR offerings and therefore will be administered to a larger population using this information collection.

3. Use of Improved Information Technology and Burden Reduction

To the extent possible, OTIP is committed to reducing the burden on applicants. The use of online evaluation forms allows recipients to complete the evaluation at a time and location convenient for them and minimizes data entry. Online responses are private. Customizable instruments with a menu of questions that can be tailored to the most relevant questions for each T/TA help minimize the burden on respondents. During the development process, the application and evaluation forms were streamlined to focus on including the most relevant questions to reduce the time burden on respondents.

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are gathered or maintained by NHTTAC or are available from other sources known to OTIP.

5. Impact on Small Businesses or Other Small Entities

Small businesses or other small entities may participate in NHTTAC offerings. OTIP minimizes the reporting burden on these entities by asking for readily available information, and using short, easy-to-complete information collection instruments.

6. Consequences of Collecting the Information Less Frequently

Without feedback on NHTTAC's T/TA offerings, OTIP will not have timely information to fulfill the requirements of the SOAR to Health and Wellness Act of 2018, or to make continuous improvements to its offerings to ensure offerings are meeting recipient needs and addressing emerging issues and other the needs of practitioners in the field. The application forms are needed to allow the field to request the appropriate services desired and determine eligibility for T/TA under NHTTAC.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances. The information collected will be voluntary and will not be used for statistical purposes.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104–13) and 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 this revised information collection activity. This notice, which was published on September 12, 2022 (Vol. 87, No. 175, pp. 55820–55821), provided a 60-day period for public comment. OTIP did not receive any substantive public comments.

9. Explanation of Any Payment or Gift to Respondents

Consistent with guidance from the Assistant Secretary for Planning and Evaluation on Methods and Emerging Strategies to Engage People with Lived Experience and to ensure the participation of respondents with a diverse array of experiences and perspectives, including respondents who have been historically underserved by federal policies and programs, NHTTAC plans to offer a token of appreciation for participation (estimated at up to $81.25 per person/hour based on the length of the engagement) in focus groups, interviews, listening sessions, and other time-intensive offerings for these audience groups. This strategy addresses the concerns referenced above by providing these subject matter expert respondents with a token of appreciation for their expertise and increases participation from a varied group of respondents to ensure T/TA is addressing the needs of a diverse group of recipients and the communities being served by public health professionals. This effort is responsive to [Executive Order 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government](https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government) to "consult with members of communities that have been historically underrepresented in the Federal Government and underserved by, or subject to discrimination in, Federal policies and programs" and "increase coordination, communication, and engagement with community-based organizations and civil rights organizations."[1]

Leading practices for developing human trafficking-specific T/TA calls for accurate and diverse experiences reflected in the curriculum and timely communication about anti-trafficking policies and practices. Agencies should take precautions to avoid perpetuating harmful cultural stereotypes. For example, "labor trafficking does not always involve migrant farmworkers from Central America, and child trafficking does not always occur to children from Southeast Asia. Organizations have the power to change public perception with more culturally sensitive and responsive narratives of trafficking."[2] Engaging people with a diverse range of lived experiences and perspectives will result in T/TA that more accurately reflects current social and cultural contexts.[3] Failing to provide a token of appreciation for the unique population of persons with lived experience and anti-trafficking practitioners will meaningfully increase response bias and may impact the quality of the information that is ultimately used in the T/TA. OTIP has received concerns from anti-trafficking practitioners relating to "a pattern of not paying folks with lived experience, or excluding their expertise" asking if it was due to "OMB policy," in response to other HHS information collections (namely, OMB #0970- 0531). In order to maintain its critical relationships with allied professionals and other stakeholders, OTIP is seeking approval to offer the subject matter expert respondents engaged through this collection with a $81.25 token of appreciation for their participation in engagements that are longer 60 minutes. Providing a token of appreciation will increase participation in this collection, and allow OTIP to maintain its relationships and rapport with allied professionals and other stakeholders who provide services to individuals who have experienced severe forms of trafficking in persons.

10. Assurance of Confidentiality Provided to Respondents

Any release of information will conform to the guidelines of the Institutional Review Board (IRB) as determined by Title 45 Part 46 of the Code of Federal Regulations. Only NHTTAC

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[1] Exec. Order No. 13985, 86 F.R. 7009 (2021). https://www.federalregister.gov/documents/2021/01/25/2021-01753/advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government

[2] Human Trafficking Leadership Academy. (2017). *Survivor-informed practice: Definition, best practices, and recommendations.* National Human Trafficking Training and Technical Assistance Center. https://nhttac.acf.hhs.gov/sites/default/files/2018-06/Survivor_Informed_definition_and_recommendations.pdf

[3] Human Trafficking Leadership Academy. (2021). *HTLA Class 7 recommendations on addressing institutional inequities and barriers to accessing services for survivors of human trafficking and communities of color.* National Human Trafficking Training and Technical Assistance Center. https://nhttac.acf.hhs.gov/resource/report-htla-class-7-recommendations-addressing-institutional-inequities-and-barriers

evaluation team members will have access to completed forms. Once the information from each form is entered into an electronic database, only those NHTTAC evaluation team members with valid identification, password, and permissions will have access to the information and raw data. Any physical forms will be maintained in a locked filing cabinet with limited access. Transmission of data from NHTTAC to OTIP will be restricted to de-identified data to protect the identity of the respondent (e.g., redacting open-ended comments with contact information, providing interview results in aggregate form).

With the exception of focus groups and interviews, all evaluations will be disseminated electronically, and limited personally identifiable information will be collected. All quantitative findings will be reported in aggregate form. When applicable, qualitative data collection efforts will collect the minimal amount of personally identifiable information (e.g., name and contact information) necessary for scheduling purposes. Any contact information will be stored separately from any notes, and all files will be password protected and stored on a secure server.

11. Justification for Sensitive Questions

No questions of a personal or sensitive nature will be asked on the evaluation forms. Only information necessary to determine eligibility requirements will be captured.

12. Estimates of Annualized Burden Hours and Costs

A variety of instruments and platforms will be used to collect information from respondents. The annual burden hours requested (15,714) is based on the number of collections NHTTAC expects to conduct annually.

Table 1. Annual Burden Estimates (Hours)

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours
Universal T/TA Participant Feedback Long Version (full form) Short Version (partial form)	 2,100 50,000	 1 1	 0.43 0.10	 2,709 15,000	 903 5,000
Intensive T/TA Participant Feedback	650	1	1.17	2,282	761
Follow-Up Feedback	10,000	1	0.50	15,000	5,000
Qualitative Guide	2,200	1	1.50	9,900	3,300
Network Survey	600	1	1.00	1,800	600

Client Satisfaction Survey	1,000	1	0.08	240	80
Resources Feedback	500	1	0.08	120	40
Requester Feedback	250	1	0.12	90	30
Estimated Total Annual Respondents:	**67,300**		**Estimated Total Annual Burden Hours:**		**15,714**

The package contains forms that will require varying levels of burden hours to complete, which impacts the estimated cost burden. The estimates of annualized cost to respondents are based on appropriate wage rate categories and annual salaries for position types in which respondents serve. Estimates for the average hourly wage for respondents are based on the U.S. Department of Labor National Compensation Survey estimate for the occupations presented below, which were gathered from the following website: https://www.bls.gov/oes/current/oes_stru.htm.

The wage data from May 2021 were applied for the following job codes:

- 21-0000—Community and Social Service Occupations—at $25.94 per hour
- 21-1018—Substance Abuse/Behavioral Disorder/Mental Health—at $25.72 per hour
- 29-9099—Healthcare Practitioner/Technical Workers—at $31.19 per hour
- 11-9111—Medical and Health Services Manager—at $57.61 per hour

To account for fringe benefits and overhead, the rates above were multiplied by two and then multiplied by the associated number of annual burden hours to obtain the total cost by instrument. Table 2 shows the estimated burden and annualized cost information per instrument.

The estimated total annual cost burden to respondents resulting from the collection of information as part of the OTIP application and evaluation package is $913,774.02.

Table 2. Annual Burden Estimates (Cost)

Instrument	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Universal T/TA Participant Feedback							
Long Version (full form)	2,100	1	0.43	2,709	903	$62.38	$56,329.14
Short Version (partial form)	50,000	1	0.10	15,000	5,000	$62.38	$311,900.00

Intensive T/TA Participant Feedback	650	1	1.17	2,282	761	$51.88	$39,480.68
Follow-Up Feedback	10,000	1	0.50	15,000	5,000	$51.88	$259,400.00
Qualitative Guide	2,200	1	1.50	9,900	3,300	$62.38	$205,854.00
Network Survey	600	1	1.00	1,800	600	$51.88	$31,128.00
Client Satisfaction Survey	1,000	1	0.08	240	80	$51.88	$4,150.40
Resources Feedback	500	1	0.08	120	40	$51.88	$2,075.20
Requester Feedback	250	1	0.12	90	30	$115.22	$3,456.60
Estimated Total Annual Burden Hours:	**15,714**	**Estimated Total Annual Cost:**					**$ 913,774.02**

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no additional costs to respondents and record keepers.

14. Annualized Cost to the Federal Government

The estimated annual cost to the federal government staff is minimal and limited to staff review time of applications. We estimate the overall **annualized cost to the federal government** to be $258,062. This cost estimate is based on the task order of work projected for completion under the contract for this T/TA effort. As outlined below, the estimated annual federal costs associated with the NHTTAC Evaluation Package include the capital/startup and operating and maintenance costs necessary for this information collection, to include the quantification of hours for managerial and support staff to administer the Consultant and Evaluation Package process, the acquisition or development of collection techniques, and operational expenses (e.g., equipment, overhead, printing) for the 3 years for which this approval is sought.

- Capital/startup costs: $0. The capital and startup costs were already incurred through the previous approval, which included instrument design and development.
- Operating and maintenance costs: $258,062. This amount reflects the **total annual costs** for operating and maintaining any automated, electronic, mechanical, or technological collection techniques, as well as the labor necessary to implement, analyze, and report on this effort.

15. Explanation for Program Changes or Adjustments

To continue to meet the provisions of the Pub. L. 115–398, NHTTAC has expanded the administration of SOAR each year, and deeper measurements of the impact of these efforts are necessary. Additionally, the annual burden for several forms has increased and items were expanded to include measures related to specific skills and knowledge, as well as outcomes at the organizational and community levels, to help improve NHTTAC evaluation efforts. More detailed evaluation data can help facilitate new improvements in NHTTAC T/TA. Forms included in this request for approval increase the burden allotment and expand measures included in the previously approved NHTTAC Evaluation Package to align with the passage of the SOAR to Health and Wellness Act of 2018. This program activity also enables OTIP to fulfill recommendations and priority actions articulated within the National Action Plan to Combat Human Trafficking (Fiscal Years 2022–2024), the ACF Strategic Plan (Fiscal Year 2022), and the U.S. Advisory Council on Human Trafficking's Annual Report (Fiscal Year 2022).

By adding new measures and tools, NHTTAC will address, for example:

- *ACF's Strategic Goal 1 (Advance equity by reducing structural barriers including racism and other forms of discrimination that prevent economic and social well-being)* by integrating the perspectives and experiences of program participants, as well as identifying and closing gaps in program outcomes for historically underserved and/or marginalized populations, through evaluation.
- *ACF's Strategic Goal 2 (Take a preventative and proactive approach to ensuring child, youth, family, and individual well-being)* by evaluating outcomes associated with NHTTAC training and technical assistance (T/TA) focused on increasing access to evidence-based, culturally relevant, and community-based resources and services; improving outreach, engagement, and connections to identify and reach individuals who are eligible for services but may not be receiving them; empowering individuals to determine what supports they need in order to thrive and gain independence; and using data and lived experiences to predict and preempt needs.
- *ACF's Strategic Goal 3 (Use whole-family, community-based strategies to increase financial stability and economic mobility)* by evaluating outcomes associated with T/TA focused on building capacity at the community level through training and partnerships to create environments where children, youth, families, and individuals can collectively thrive.
- *ACF's Strategic Goal 4 (Support communities and families to respond to acute needs and facilitate recovery from a range of crises and emergency situations)* by evaluating outcomes associated with T/TA focused on providing care that is trauma-informed, culturally specific, gender-responsive, timely, and tailored to community needs.
- *ACF's Strategic Goal 5 (Enable and promote innovation within ACF to improve the lives of children, youth, families, and individuals)* by strengthening evidence-building activities and expanding access to and use of data to improve the design and delivery of all ACF programs.

Revisions have been made in order to:

- Respond to Postgraduate Institute for Medicine accreditation requirements through SOAR T/TA
- Reduce burden where applicable
- Provide flexibility for NHTTAC to assess new knowledge gains, application of skills/competencies, and outcomes of participants who received NHTTAC T/TA
- Understand NHTTAC's progress on improving diversity, equity, and inclusion

These revisions include an increased burden allotment of the previously approved NHTTAC Evaluation Package from 9,497 hours to 15,714 hours to accommodate the larger volume of T/TA and number of participants. It also includes more participation in follow-up evaluations to address the third bullet above.

16. Plans for Tabulation and Publication and Project Time Schedule

The evaluation results will be tabulated using parametric and nonparametric statistical tests. All findings will be reported de-identified and in aggregate form. OTIP may receive requests to release the information (e.g., congressional inquiry, Freedom of Information Act requests). OTIP will disseminate the findings when appropriate, strictly following the U.S. Department of Health and Human Services' Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated to the Public, and will include specific discussion of the limitation of the data. Additionally, over the past year, OTIP and NHTTAC have been working closely with ACF's Office of the Chief Data Officer (OCDO) to explore opportunities to make NHTTAC's T/TA data more open and accessible to the general public. Feedback on SOAR offerings and implementation (e.g., Tab D – Universal TTA Participant Feedback) will be de-identified and made available to the public on healthdata.gov.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

OTIP is not requesting an exemption. The OMB control number and expiration date will be displayed on all forms.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

These activities comply with the requirements in 5 CFR 1320.9.