

Sexual Risk Avoidance Education (SRAE) National Evaluation Overarching Generic

OMB Information Collection Request

New Umbrella Generic

Supporting Statement

Part A

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Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
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Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for an overarching generic clearance to collect data from programs delivered by Sexual Risk Avoidance Education (SRAE) grant recipients on behalf of the SRAE National Evaluation. The Administration for Children and Families (ACF) is requesting three years of approval.
- **Description of Request:** The information collected under this generic clearance is intended to identify innovative implementation strategies and program components used by SRAE grant recipients. There is not extensive evidence on SRAE programming to inform SRAE grant recipients' implementation and program improvement efforts. To add to this limited body of evidence and support ACF's administration of the SRAE grant program, the SRAE National Evaluation includes data collection to identify strategies and components that have the potential to improve the delivery and/or quality of SRAE programming. This work is rapid and iterative to allow any learnings to be disseminated to SRAE grant recipients during their grant award periods. As the study team identifies strategies ready for evaluation, rapid, responsive work will be undertaken to allow any learnings to be disseminated back to SRAE grant recipients within their grant award periods. For these reasons, ACF's Office of Planning, Research, and Evaluation is seeking approval for an overarching generic clearance. ACF does not intend for this information to be used as the principal basis for public policy decisions.

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A1. Necessity for Collection

The Administration for Children and Families' (ACF) Office of Planning, Research, and Evaluation (OPRE) requests Office of Management and Budget (OMB) approval for a new overarching generic clearance to submit individual information collection (GenIC) requests for collecting data from programs delivered by Sexual Risk Avoidance Education (SRAE) grant recipients on behalf of the SRAE National Evaluation. The purpose of the GenICs will be to inform ACF programming by building evidence about what innovative implementation strategies and program components have the potential to improve programming and outcomes across the SRAE grant recipients and the youth they serve. The opportunities will relate to innovations in use by SRAE grant recipients as they arise and this generic mechanism will allow ACF to rapidly respond to research and evaluation opportunities that would not otherwise be feasible under the timelines associated with the Paperwork Reduction Act (PRA) of 1995.

Study Background

As part of the federal government's ongoing efforts to support youth in making healthy decisions about their relationships and behaviors, in February 2018, Congress updated Title V, Section 510 of the Social Security Act to authorize the SRAE grant program. Administered by the Family and Youth Services Bureau (FYSB) within ACF of the U.S. Department of Health and Human Services (HHS), SRAE funds programs that teach adolescents to refrain from sexual activity. The programs will also provide education on personal responsibility, self-regulation, goal setting, healthy relationships, a focus on the future, and preventing drug and alcohol use. The SRAE legislation also calls for a national evaluation of the program.

The first phase of the SRAE National Evaluation was conducted between 2018 – 2023. The evaluation had three primary components: (1) describe grant recipients' program plans and implementation experiences during the first five years of funding, (2) identify strategies for improving the effectiveness of SRAE programming, and (3) support grant recipients in their efforts to evaluate their local programs and use data for program improvement efforts. The second phase of the SRAE National Evaluation has similar objectives. The SRAE National Evaluation will continue to support grant recipients with their local evaluation and data use efforts. The SRAE National Evaluation will also describe and rigorously test the promise, and when suitable, the effectiveness of strategies to improve the delivery of programming, including the continued evaluation of strategies identified under the first phase of the evaluation.

Under the proposed umbrella generic, OPRE intends to conduct research and evaluation of innovative implementation strategies and program components used by SRAE grant recipients and the youth they serve. There is not an extensive evidence base on SRAE programming to inform SRAE grant recipients' implementation and program improvement efforts. To add to this limited body of evidence and support ACF's administration of the SRAE grant program, the SRAE National Evaluation includes data collection to identify strategies and components that have the potential to improve the delivery and/or quality of SRAE programming. To promote efficiency and continuous quality improvement, as the study team identifies innovative strategies that are ready for evaluation, the work will need to begin quickly so that the learnings can be disseminated back to SRAE grant recipients within their grant award periods.

Initial GenIC Request

We have identified one innovative strategy that we would like to learn more about immediately upon approval of this overarching generic clearance, before planning a more in-depth study that would be

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reflected in a future submission to OMB. This initial GenIC request is included within the request for the new umbrella generic; future GenICs will be submitted individually.

In rural New Mexico, an SRAE grant recipient will serve youth participating in a 2025 summer youth employment program. This mechanism provides a means to deliver their SRAE program – NativeSTAND – during the summer months when youth are at a greater risk of engaging in unhealthy behaviors. For example, in their area of the state, the teen pregnancy rate is 55 per 1,000 girls ages 15 – 17, which is twice the national average. To deliver NativeSTAND when youth are already gathering for a summer employment program, the grant recipient will compress the 27 lessons of NativeSTAND into a concentrated three days. In the past, the grant recipient delivered the program over four weeks. If this concentrated and efficient approach shows potential success, other grant recipients, particularly those in rural areas, could replicate the approach when they need to deliver programming over a compressed period. We propose conducting a proof-of-concept study to assess the promise of this efficient approach to delivering programming. This proof-of-concept study will address two primary questions: (1) Do youth receive the majority of the intended content? and (2) Are youth outcomes improving as expected after receiving NativeSTAND in a compressed format?

A2. Purpose

Purpose and Use

The goal of the GenIC requests under this umbrella generic is to conduct a range of research and evaluation activities (i.e., program components research, outcome and implementation evaluations, descriptive studies, evaluation technical assistance, etc.) efficiently. The evaluation activities will utilize innovative learning methods and may include qualitative and quantitative methods to evaluate promising implementation strategies. The intended use of the resulting data is to identify practices and program components that have the potential to improve the delivery and/or quality of services administered by SRAE grant recipients. This will help increase the evidence base on SRAE programming to inform SRAE grant recipients' implementation and program improvement efforts.

Information produced will be valuable to federal leadership and staff, grant recipients, local implementing agencies, researchers, and/or training/TA providers. The information will also provide valuable information to researchers, program evaluators, and administrators, on what implementation strategies demonstrate promise and can highlight opportunities for future evaluation efforts.

The information collected is meant to contribute to the body of knowledge on SRAE 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.

Initial GenIC Request

For the proof-of-concept study on the compressed program delivery format, the purpose of the information collection is to assess whether youth receive the majority of the intended lessons and whether their outcomes improve as expected. The information collected from the proof-of-concept study will be used to inform whether a more in-depth study is feasible. If it is feasible, the information collected will guide a future in-depth study, which would be submitted separately for OMB review and approval.

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Research Questions or Tests

Research questions will center around which program services or components are being delivered to youth, how they are being delivered, and whether they are associated with improved outcomes for participants. To answer these research questions, potential data collection includes conducting interviews with SRAE program staff, including front-line facilitators working directly with youth; staff from partner organizations that work with SRAE programs; focus groups and surveys of youth participating in SRAE programs; brief surveys or “exit tickets” youth and program facilitators will complete after individual program sessions; and analysis plan and report templates that grant recipients can use to disseminate their local evaluation findings.

Due to common evaluation challenges in programs serving youth in the various settings in which SRAE programs operate, such as community settings outside of schools, an important component of this work is identifying strategies that can help overcome these challenges. Therefore, the activities submitted in the GenIC requests will explore promising practices for serving populations more difficult to reach outside of school-based programming, such as adjudicated youth and youth in foster care.

Exhibit 1 identifies overarching research questions that the study team expects to cover across anticipated GenICs. Instruments 1 – 9 share illustrative examples of survey questions and interview and focus group topics that are possible to address the range of overarching research questions for this umbrella generic package. These will be tailored for individual GenICs

Initial GenIC Request

This proof-of-concept study will address two primary questions:

- (1) Do youth receive the majority of the intended content? ¹
- (2) Are youth outcomes improving as expected after receiving NativeSTAND in a compressed format?

This GenIC will use the *Youth Survey – Proof-of-Concept* (Instrument 1a), which is adapted from Instrument 1.

Exhibit 1. Sample research questions and instrument matrix for the SRAE National Evaluation

	Instrument 1: Youth survey	Instrument 2: Administrator, staff, and partner topic guide	Instrument 3: Youth topic guide	Instrument 4: Youth exit ticket	Instrument 5: Facilitator exit ticket	Instrument 6: Analysis plan for impact evaluations	Instrument 7: Analysis plan for descriptive evaluations	Instrument 8: Report template for impact evaluations	Instrument 9: Report template for descriptive evaluations
What are the characteristics of the youth who receive the SRAE	X	X	X			X	X	X	X

^{1 a} To address this question, information will be collected through program attendance documents the site already uses.

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programming?									
What are the components of the planned SRAE programming? Are the program components implemented consistently and with fidelity?		X			X	X	X	X	X
To what extent are youth engaged in the SRAE programming? How do youth experience the program content and activities?	X	X	X	X	X	X	X	X	X
What successes and challenges do program staff experience delivering the SRAE program and its specific components?		X			X	X	X	X	X
What partnerships do providers rely upon to deliver SRAE programming? What successes and challenges do programs experience when working with partners?		X				X	X	X	X
How are staff responsible for SRAE program delivery identified and trained? What ongoing support do they receive?		X				X	X	X	X
To what extent does the SRAE program impact changes in youth engagement, attitudes, skills, knowledge, intentions, and behavior?	X			X		X	X	X	X

Study Design

Under this clearance, the study team may use a variety of approaches and study designs. The exact data collection methods and samples for each GenIC will depend on the strategy or component being evaluated and the population served by participating grant recipients. The study seeks to utilize innovative methodological techniques, which will be strengthened by the collection of data using well-established methodologies including:

- Questionnaires/Surveys
- Semi-structured interviews (in-person, telephone or web-based)
- Focus groups
- Administrative data

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- Direct observation
- Document analysis

Study designs may include qualitative and quantitative descriptive methods and rigorous impact evaluations to evaluate promising implementation strategies.

Exhibit 2a lists sample data collection activities for illustrative purposes. Exhibit 2b includes the data collection activities for the initial GenIC.

Exhibit 2a. Example Instrument and Proposed Purposes

Example Instruments	Sample data collection activity	Sample respondent, content, and purpose of collection	Mode and potential duration
Instrument 1	Youth survey	<p>Respondents: Youth</p> <p>Content: Demographic and youth outcomes data (i.e., individual functioning and well-being, future aspirations and intentions, healthy relationships and communication, sexual risk avoidance outcomes, risk-taking behaviors, school involvement, and SRAE program experiences)</p> <p>Purpose: Evaluations utilizing quantitative data</p>	<p>Mode: web-based, in-person</p> <p>Duration: 30 minutes</p>
Instrument 2	Administrator, staff, and partner topic guide	<p>Respondents: Program directors and managers, facilitators, partners</p> <p>Content: Staff feedback on various topics related to SRAE program implementation, including successes, challenges, and lessons learned; program partnerships established; and the broad characteristics of SRAE facilitators and the youth they serve</p> <p>Purpose: Evaluations utilizing qualitative data</p>	<p>Mode: web-based, in-person</p> <p>Duration: 75 minutes</p>

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Instrument 3	Youth topic guide	<p>Respondents: Youth</p> <p>Content: Youth feedback on various topics related to their participation and level of engagement in the program, satisfaction with the program, feelings of safety and connectedness, perceptions of the relevance of program content, and relationship with the SRAE facilitators)</p> <p>Purpose: Evaluations utilizing qualitative data</p>	<p>Mode: web-based, in-person</p> <p>Duration: 60 minutes</p>
Instrument 4	Youth exit ticket	<p>Respondents: Youth</p> <p>Content: Youth feedback on experience participating in a single SRAE workshop/class</p> <p>Purpose: Evaluations utilizing qualitative and quantitative data</p>	<p>Mode: web-based, in-person</p> <p>Duration: 2 minutes</p>
Instrument 5	Facilitator exit ticket	<p>Respondents: Facilitators</p> <p>Content: Facilitator feedback on experience facilitating a single SRAE workshop/class</p> <p>Purpose: Evaluations utilizing qualitative and quantitative data</p>	<p>Mode: web-based, in-person</p> <p>Duration: 2 minutes</p>
Instrument 6	Analysis plan for impact evaluations	<p>Respondents: Program staff and local evaluators</p> <p>Content: Analysis plan for local evaluation</p> <p>Purpose: Local evaluation technical assistance</p>	<p>Mode: Word document</p> <p>Duration: 8 hours</p>
Instrument 7	Analysis plan for descriptive evaluations	<p>Respondents: Program staff and local evaluators</p> <p>Content: Analysis plan for local evaluation</p> <p>Purpose: Local evaluation technical assistance</p>	<p>Mode: Word document</p> <p>Duration: 8 hours</p>

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Instrument 8	Report template for impact evaluations	Respondents: Program staff and local evaluators Content: Summary of local evaluation Purpose: Local evaluation technical assistance	Mode: Word document Duration: 32 hours
Instrument 9	Report template for descriptive evaluations	Respondents: Program staff and local evaluators Content: Summary of local evaluation Purpose: Local evaluation technical assistance	Mode: Word document Duration: 32 hours

Exhibit 2b. Initial GenIC Instrument and Proposed Purposes

Instrument 1a	Youth survey	Respondents: Youth Content: Demographic and youth outcomes data (i.e., knowledge of sexual health and prevention methods, self-esteem and confidence in making healthy decisions, peer relationships and support networks, sexual risk avoidance outcomes and risk-taking behaviors) Purpose: Proof-of-concept study on compressed program delivery format	Mode: web-based, in-person Duration: 30 minutes
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All GenICs submitted under this control number will consist of the criteria listed below. ACF anticipates that in some instances, the topics or statistical analysis plans may warrant public comment. In these instances, and with guidance from the OMB Office of Information and Regulatory Affairs (OIRA) ACF desk officer, ACF proposes to publish a notice in the *Federal Register* soliciting public comment over a 30-day period. Following the comment period and after all comments are considered, ACF would submit to OMB/OIRA the GenIC with a summary of comments received.

All GenICs:

- A full Supporting Statement A and Supporting Statement B will accompany each of the GenICs submitted under this generic clearance. These will include:
 - o A discussion of the respondents. SRAE program administrators, staff and partner organization staff; youth program participants; and program facilitators are the anticipated respondents to GenICs.

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- o Information about the context of each specific IC. Researchers will speak with and conduct information collections with specific populations in particular geographic locations/settings/agencies.
- o An overview of the planned collections, methods, and program evaluations associated with each specific IC. This will include:
 - A description of the planned qualitative data collection including submission of the specific instruments for review. Anticipated instruments include focus group/interview topic guides and surveys specific to each respondent group (administrators, staff, and participants).
 - A description of the qualitative analyses planned. Audio recordings and notes from interviews/focus groups will be analyzed for patterns and themes.
 - A description of the quantitative analyses planned. Anticipated instruments include participant surveys and exit tickets.
 - A description of the administrative data that agencies and programs are already collecting and that the project will utilize, such as attendance or SRAE performance measures data². It is important to note that collecting administrative data imposes minimal burden on respondents or record keepers, as sites collect these data for separate performance measures requirements.
- o Information about planned communication about the findings, including grant recipients' plans to analyze data from their own local evaluations and disseminate the results.
- Final proposed instruments will accompany each of the GenICs submitted under this generic clearance.
- Any supplementary materials (advance letters, emails, etc.) will accompany each of the GenICs submitted under this generic clearance, as appropriate.

Initial GenIC Request

For the proof-of-concept study on the compressed program delivery approach, we will collect quantitative data only and will survey youth at the beginning and at the end of their summer youth employment program, and again six months after completing the summer youth employment program. Youth are expected to be high school age, and to create Instrument 1a, we have selected questions from the overarching youth survey (Instrument 1) that are appropriate for older youth. Because the proof-of-concept will primarily involve youth in Tribal communities, Instrument 1a includes an additional section on Native Identity (see Section C, Instrument 1a), as well as a small number of minor revisions to wording and response options. We will also gather attendance data that the grantee is already collecting to assess the extent to which they receive majority of the content in this compressed format. Youth outcome data will be collected from study participants through a survey administered at three points: pre-programming, immediately post-programming, and six months after programming. The pre- and post-surveys will be administered on site, in person via hard copy. The six-month survey will be administered via the web. We will follow up with non-respondents by phone, email, text, and mail. See B.2 for details on the data collection plan.

Other Data Sources and Uses of Information

Multiple evaluation and data collection activities from the first and second phases of the SRAE National Evaluation are being used to select sites and inform the research questions, evaluation designs, and data

²SRAE grant recipients are required to report performance measures data twice a year using OMB-approved instruments (OMB 0970-0536).

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collection plans for this next phase. To identify potentially eligible sites, the study team will review various extant data elements for each grant recipient, including grant application materials, annual reports, SRAE performance measures data (OMB Control No. 0970-0536), and data on program plans and implementation experiences collected under the first phase of the SRAE National Evaluation (OMB Control No. 0970-0530 and 0970-0596). The SRAE National Evaluation first identified strategies used to improve the facilitation of SRAE programs, including the use of co-regulation strategies to improve youth self-regulation, using peers as leaders, and strategies for serving youth in community-based programs, such as those offered for adjudicated youth and those in foster care.

OMB approved a first phase of the Measuring Self- and Co-Regulation in Sexual Risk Avoidance Education Programs under the umbrella generic Pretesting of Evaluation Data Collection Activities (0970-0355) in April 2023. During that initial pilot, the study team developed and conducted a pretest of a Youth Self-Assessment Survey (titled “How I Feel and What I Do”). Based on findings from the pretest and additional internal discussions about the goals of the survey, the survey was refined by revising the wording of items and adding domains covering knowledge of SRAE topics; perceptions of the classroom environment; perceptions of the facilitator-youth relationship; and knowledge of the skills reinforced through the classroom co-regulation strategies. Under the same umbrella generic, OMB approved ACF’s information collection request for further piloting of the revised and expanded survey items in August 2024. Results from that pilot are reflected in the youth survey items associated with this umbrella generic request (labeled as “SRAENE Co-reg Pilot Measure”).

A3. Use of Information Technology to Reduce Burden

ACF is using technology to collect and process data to reduce respondent burden and make data processing and reporting faster and more efficient.

The study team will program and administer surveys using a state-of-the-art survey software platform for multimodal surveys (such as Forsta, Qualtrics, QuestionPro, etc.). The survey will be web-based and administered to youth at the sites in a group setting. The selected software will have built-in mobile formatting to ensure that the display adjusts for device screen size. If needed, respondents can pause and restart the survey, with their responses saved. The selected survey platform will also include tailored skip pattern and text-fill capabilities. These features allow respondents to move through the questions more easily and automatically skip questions that do not apply to them, thus minimizing respondent burden. The study team will also be prepared to administer surveys as hard copies if internet connectivity is challenging in any area where study activities are occurring.

Interviews and focus groups will be conducted either in-person or virtually depending on what works best for the site. Virtual focus groups and interviews may be conducted via a video conference platform such as Zoom or WebEx. The study team will also explore potentially conducting asynchronous focus groups via a chat board platform (such as QualBoard) that imposes a smaller burden than other interview methods.³ The online message board permits respondents to maintain anonymity and provides flexibility in scheduling the interview with participants since participants can answer questions asynchronously at any time.

³ Opendakker, R. “Advantages and Disadvantages of Four Interview Techniques in Qualitative Research.” *Qualitative Research in Ibero America*, vol. 7, no. 4, 2006, p. 7.

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Initial GenIC Request

For the proof-of-concept study, we plan to gather parent consent using hardcopy forms. However, if we experience challenges with youth returning completed forms, we will consider offering the option of completing the parental consent form electronically. Providing multiple options can minimize burden on program facilitators by reducing their need to redistribute hardcopy forms multiple times. We will coordinate with the site to determine which approach would be most appropriate and helpful in obtaining the necessary completed consent forms. The six-month follow-up data will be collected via a web-based instrument. The summer youth employment program will have ended by this time, and youth will no longer be in a single, designated location, so providing the option to complete via the web gives youth flexibility regarding where and when they complete the survey.

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

The study team has done a careful review to determine what information is already available from existing studies and program documents to inform this work and what will likely need to be collected for the first time. Wherever possible, the study team will utilize existing data, such as administrative data provided by grant recipients on program attendance; however in many cases, there will not be sufficient information that would inform how program services or components are serving youth. The data collections are intended to build the evidence base about what innovations work to improve programming and outcomes across the SRAE grant recipients and the youth they serve.

A5. Impact on Small Businesses

Staff at smaller sites may be part of this data collection effort if they serve youth in specific populations of interest. If the study team needs to conduct interviews with individuals in small sites, interviews will be scheduled at times convenient to participants to minimize disruption of daily activities.

A6. Consequences of Less Frequent Collection

Rigorous evaluation of innovative initiatives is crucial to building evidence of what works and how best to allocate scarce government resources. These data collection undertakings represent an important opportunity for ACF to both learn about activities associated with SRAE programming, and to design evaluations that increase knowledge of how to improve service delivery and uptake.

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 a

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notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on December 26th, 2024 (89 FR 105050) and provided a sixty-day period for public comment. During the notice and comment period, ACF did not receive any comments.

Consultation with Experts Outside of the Study

The study team has consulted and may continue to consult with relevant stakeholders and experts on the study design and data collection instruments. When needed, specific consultants will be identified in each GenIC.

A9. Tokens of Appreciation

To ensure recruitment of a sufficient number of youth, the study team proposes offering youth a token of appreciation for their participation in the data collection activities in the form of gift cards ranging from \$5 to \$40 per round of data collection. Participation in data collection activities that require less time from youth, such as returning consent forms, will be acknowledged with smaller denominations whereas activities that require more time, such as completing a survey at the end of programming or participating in a focus group, will be acknowledged with larger denominations.

ACF will include a written justification in the specific GenIC requests for any planned tokens of appreciation. The study team will secure Institutional Review Boards (IRB) approval for the use and monetary value of the tokens of appreciation prior to fielding any surveys, interviews, or focus groups. Additional information will be provided in each individual GenIC.

Initial GenIC Request

For the proof-of-concept study, we propose providing youth a \$10 token of appreciation in the form of a gift card for returning a hard copy or electronically submitting a completed parental consent form, regardless of whether the response is "yes" or "no". We also propose providing youth who complete the six-month follow-up survey a \$40 token of appreciation. The six-month follow-up survey will take place once youth have left the program and will require youth to complete the survey on their own time. Offering a token of appreciation could help encourage response and achieve the target response rate. Failure to achieve the target response rate of 75 percent at six months could compromise data quality.

These proposed tokens of appreciation are similar to those approved by OMB on other studies. On the Components Study of REAL Essentials Advance (REA), an OMB-approved token of appreciation valued at \$5 was provided for returning a consent form (OMB No. 0990-0480). Consent returns for REA were lower than anticipated at 61 percent, so we are proposing a slightly larger token of appreciation for the proof-of-concept study to increase consent returns. On the Supporting Youth to be Successful in Life Study (SYSIL) OMB approved a \$45 gift card token of appreciation given to youth who complete the 6-month survey (OMB Control No. 0970-0574). SYSIL 6-month data collection is ongoing, but the current response rate is 75 percent. The SYSIL population is made up of youth with experience in the child welfare system, which is a group that is difficult to locate. We anticipate the population for the proof-of-

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concept study will also be somewhat mobile and dispersed across different areas at the time of the six-month data collection, making them difficult to locate after completing the program.

Given that the pre- and immediate post-surveys will happen on-site while the youth are participating in the program, we do not intend to provide tokens of appreciation for those activities.

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

Personally Identifiable Information

Personally Identifiable Information (PII) in the form of names, organizations, and positions may be collected from SRAE program staff, including front-line facilitators and staff from partner organizations. PII collected from youth directly through consent forms and surveys may include name, date of birth, address, email and telephone number so youth can be reached for follow-up surveys and to deliver tokens of appreciation. Procedures for protecting privacy of information include limiting the number of individuals who have access to identifying information, using locked files to store hardcopy forms, assigning unique IDs to each participant to ensure anonymity, and implementing guidelines pertaining to data reporting and dissemination. ACF will include the exact details of what PII is collected, the purpose and need for the information in specific GenIC requests.

Initial GenIC Request

For the proof-of-concept study, we will collect contact information from youth who participate in the study including name, address, phone number, email, and social media contact information. This information will be used to contact youth to complete the six-month follow-up survey since they will no longer be participating in the youth program.

Assurances of Privacy

Information collected will be kept private to the extent permitted by law. 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. As specified in the contract, Mathematica (hereafter referred to as the "Contractor") will comply with all Federal and Departmental regulations for private information.

For all data collection activities, respondents will be informed that their participation is voluntary, that they have the right to discontinue participation at any time without impacting any services they receive, and of the risks and benefits of participation. Informed consent will be obtained from all respondents participating in interviews, focus groups, and surveys, and for youth participants under 18, parental consent will be obtained. They will be assured that their individual responses will be anonymized and reported only in the aggregate.

At least some of the information collected under this ICR will likely be retrieved by an individual's personal identifier in a way that triggers the Privacy Act of 1974, as amended (5 U.S.C. 552a). The system of records notice (SORN) for this collection is OPRE Research and Evaluation Project Records, 09-80-0361. Each individual will be provided with information that complies with 552a(e)(3) prior to being asked for information that will be placed into that system of records. This means respondents will receive information about the authority, the purposes for use, the routine uses, that the request is voluntary, and any effects of not providing the requested information.

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Due to the potentially sensitive nature of this research (see A.11 for more information), an individual GenIC may specify that the evaluation will obtain a Certificate of Confidentiality. If applicable, the study team will apply for this Certificate and mention it in the GenIC request materials. The Certificate of Confidentiality will help to assure participants that their information will be kept private to the fullest extent permitted.

Data Security and Monitoring

As specified in the contract, the Contractor shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor has developed a Data Safety and Monitoring Plan that assesses all protections of respondents' PII. 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.

As specified in the evaluator's contract, the Contractor 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. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's 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. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or PII that ensures secure storage and limits on access.

A11. Sensitive Information⁴

Most of the questions that will be included in these activities will not be of a sensitive nature. However, it is possible that some potentially sensitive questions may be included under this clearance given the focus of the SRAE program, a program designed to teach youth to voluntarily refrain from non-marital sexual activity. For example, depending on the study question under individual GenIC request, youth surveys may include questions related to sexual activity, mental health, and drug and alcohol use. For proposed collections that include questions of a sensitive nature, ACF will provide a full justification when submitting an individual GenIC request.

Initial GenIC Request

⁴ 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.

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The proof-of-concept study seeks to understand if youth outcomes improve as expected after receiving NativeSTAND in a compressed format. Based on the program logic model, these outcomes include changes in sexual risk behaviors and alcohol and drug use. When asked to complete surveys, participants will be informed that their identities will be kept private, and they do not have to answer questions that make them uncomfortable.

Table A.11.1 lists the sensitive topics on the surveys, along with justification for including each topic. Questions about sensitive topics have been drawn from previously successful youth surveys and similar federal evaluations. Although these topics are sensitive, they are covered in the delivery of SRAE program content and commonly and successfully asked of similar populations. All data collection instruments will be reviewed by the Navajo Nation Human Research Program IRB.

Table A.11.1. Summary of sensitive topics to be included on the youth survey for proof-of-concept study

Topic	Justification
Sexual risk behaviors and attitudes	The NativeSTAND curriculum includes content that focuses on increased understanding of sexual health, STIs, HIV/AIDS, and pregnancy prevention, which are expected to influence sexual risk-taking behaviors in youth. To measure the medium-term outcomes related to avoidance of risky behaviors related to sexual health, the youth outcome surveys include questions about youth's personal opinions regarding sexual activity and on sexual activity behaviors. Similar questions have been approved previously by OMB.
Drug and alcohol use	The NativeSTAND curriculum includes a lesson on expanding youth knowledge of the effects of drug and alcohol use and decreasing drug and alcohol use. To assess the impacts of the curriculum on these targeted outcomes, the youth outcome surveys include questions about drug and alcohol use. Similar questions have been approved previously by OMB.

A12. Burden

Explanation of Burden Estimates

The total annual burden hours requested across all studies under this umbrella generic information collection is 1875 hours. The burden table below is illustrative, based on our best estimate of the types of instruments that will be used for each study. While the study team will not exceed the total burden cap for this generic, more or less burden may be used within each instrument type. Exhibit 4 details the estimated burden hours.

We expect a total number of 2160 youth respondents will complete both surveys and exit tickets. A subset of these youth will participate in youth focus groups. We expect a total number of 300 program staff, including administrators and facilitators, will participate as respondents. A subset of those staff will complete the facilitators' exit ticket, as reflected in the table below. We expect that up to 20 grant recipients will write reports on their local evaluations – 10 of whom will be conducting evaluations using primarily quantitative data and 10 who will be conducting evaluations using a qualitative and/or quantitative data to describe their programs.

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For the proof-of-concept study, the only data collected will be youth surveys (Instrument 1a) at three points in time for no more than 100 youth participating in programming in summer 2025. As shown in Exhibit 4A below, this burden is expected to be 150 total hours with an annual respondent cost of \$362.50. This burden is assumed to be included in the total youth burden described above and reflected in Exhibit 4.

Estimated Annualized Cost to Respondents

Estimated costs per respondent were estimated using data from the Bureau of Labor Statistics, Occupational Employment Statistics (May 2024)⁵. Exhibit 3 details median hourly wage for respondent types. Exhibit 4 details estimated total annuals costs per information collection.

Exhibit 3: Median Hourly Wages for Respondents

Respondent	Occupation	SOC Code	Mean Hourly Wage
Youth	Federal minimum wage	--	\$7.25
Administrators	Social and Community Services Manager	11-9151	\$41.39
Facilitators	Community and Social Service Specialists, All Other	21-1099	\$26.18

Exhibit 4: Estimated Burden and Costs to Respondents for Overarching Data Collection Activities

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
Youth survey	2160	3	0.5	3,240	1,080	\$7.25	\$7,830.00
Administrator, staff, and partner topic guide	300	1	1.25	375	125	\$41.39	\$5,173.75
Youth topic guide	200	1	1	200	67	\$7.25	\$485.75
Youth exit ticket	2160	15	0.03	972	324	\$7.25	\$2,349.00
Facilitator exit ticket	36	30	.03	32	11	\$26.18	\$287.98
Analysis plan for impact evaluations	10	1	8	80	27	\$41.39	\$1,117.53
Analysis plan for descriptive evaluations	10	1	8	80	27	\$41.39	\$1,117.53
Report template for impact evaluations	10	1	32	320	107	\$41.39	\$4,428.73
Report template for descriptive evaluations	10	1	32	320	107	\$41.39	\$4,428.73

⁵ https://www.bls.gov/oes/current/oes_stru.htm

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Totals	2,480				1,875		\$27,219.00
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Exhibit 4A: Estimated Burden and Costs to Respondents for Proof-of-Concept Study

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
Youth survey for proof-of-concept study	100	3	0.5	150	50	\$7.25	\$362.50

A13. Costs

There are neither capital nor startup costs, nor are there any operations or maintenance costs. There are no additional total annual cost burdens to respondents or record-keepers beyond the labor cost of burden-hours described in A12.

A14. Estimated Annualized Costs to the Federal Government

Cost Category	Estimated Costs
Field Work	\$1,369,438
Analysis	\$900,759
Publications/Dissemination	\$200,000
Total costs over the request period	\$2,470,197
Annual costs	\$823,399

A15. Reasons for changes in burden

This is a request for a new umbrella generic.

A16. Timeline

Pending OMB approval, the study team anticipates beginning data collection in summer 2025 for the proof-of-concept study on compressed programming. Other data collection activities will continue through 2027. We will submit GenICs for each new planned data collection. Work in 2028 will be dedicated to analysis, report writing, and dissemination.

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1: Youth survey

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Instrument 1a: Youth survey for proof-of-concept study

Instrument 2: Administrator, staff, and partner topic guide

Instrument 3: Youth topic guide

Instrument 4: Youth exit ticket

Instrument 5: Facilitator exit ticket

Instrument 6: Analysis plan for impact evaluations

Instrument 7: Analysis plan for descriptive evaluations

Instrument 8: Report template for impact evaluations

Instrument 9: Report template for descriptive evaluations

Appendix A: Example consent and assent forms

Appendix A1: Proof-of-concept study consent and assent forms

Appendix B. Instrument 1 Item Source List

Appendix C1: Proof-of-concept survey outreach materials