

Feedback on Current Personal Responsibility Education Program (PREP) Information Collections

Formative Data Collections for ACF Research

0970 – 0356

Supporting Statement

Part A

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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 a generic information collection under the umbrella generic, Formative Data Collections for ACF Research (0970-0356).
- **Progress to Date:** The Administration for Children and Families (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 Sexual Risk Avoidance Education Program Performance Analysis Study (SRAE PAS) (OMB #0970-0536). Additionally, as part of an agency-wide initiative to identify sexual orientation and gender identity (SOGI) items for youth, ACF is beginning a process of gathering feedback on potential SOGI questions for youth. ACF is in the process of requesting a one-year extension for SRAE PAS while we work to finalize SOGI items in the youth participant entry and exit surveys. This request is an initial step to support the described efforts.
- **Description of Request:** This information collection request is to conduct focus groups with grant recipients to garner initial feedback on their experiences administering the current PREP participant entry and exit surveys and identify potential improvements to the surveys, including the SOGI items currently included. This effort will also be informed by pretesting activities, which will be submitted for review and approval under the Pre-testing of ACF Data Collection Activities umbrella generic (0970-0355).

We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** The goal is to conduct these focus groups before the end of the month to allow the next steps to support these efforts to move forward.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

A1. Necessity for Collection

As part of the effort to improve performance measures collected by adolescent pregnancy prevention programs, the Administration for Children and Families (ACF) is beginning a process to revise the Personal Responsibility Education Program (PREP) youth surveys (approved under OMB #: 0970-0497) and surveys approved for the Sexual Risk Avoidance Education Program Performance Analysis Study (SRAE PAS) (OMB # 0970-0356).

Background

In March 2010, Congress authorized PREP as part of the Patient Protection and Affordable Care Act (ACA). PREP provides grants to states, tribes and tribal communities, and community organizations to support evidence-based programs to reduce teen pregnancy and sexually transmitted infections (STI). The programs are required to provide education on both abstinence and contraceptive use. The programs also offer information on adulthood preparation subjects such as healthy relationships, adolescent development, financial literacy, parent-child communication, education and employment skills, and healthy life skills. Grant recipients are encouraged to target their programming to high-risk populations—for example, youth in foster care, homeless youth, youth with HIV/AIDS, pregnant youth who are under age 21, mothers who are under age 21, and youth residing in geographic areas with high teen birth rates.

The Government Performance and Results Act (GPRA) Modernization Act of 2010 (Public Law 111-352) requires federal agencies to report annually on measures of program performance. To inform efforts to improve these measures for youth, ACF is planning a set of focus groups with PREP grant recipients about potential improvements to the performance measures in the currently approved information collections for PREP referenced previously.

Sexual orientation and gender identity (SOGI) measures are used in performance measures reporting by multiple ACF programs, including PREP. As part of an agency-wide initiative to select SOGI items for youth, the ACF is beginning a process of gathering feedback to inform efforts to update SOGI measures to better represent how youth self-identify, as well as to align with Executive Order (EO) 14075 (*Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals*). As part of these efforts, ACF will work to improve the SOGI items in the Personal Responsibility Education Program (PREP) Performance Measures (approved under OMB #: 0970-0497). These efforts will be informed by pretesting activities, which will be submitted for review and approval under the Pre-testing of ACF Data Collection Activities umbrella generic (0970-0355).

ACF has contracted with Mathematica to complete this work and the following focus group activities.

A2. Purpose

Purpose and Use

The purpose of this collection is to gather feedback from grant recipients about current SOGI measures and other performance measures included on approved information collections for the PREP program.

This information collection will be used in conjunction with information from planned pretesting activities to inform revisions to SOGI measures for ACF youth program participants and additional measures for PREP youth participant entry and exit surveys. This effort supports equity and full inclusion

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

for LGBTQI+ individuals as noted in Executive Order (EO) 14075 (*Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals*) by advancing the responsible and effective collection and use of data on SOGI measures, as discussed in section 11 of the EO.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for research and evaluation (0970-0356):

- inform the development of ACF research
- maintain a research agenda that is rigorous and relevant

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

Focus groups will focus on the following guiding questions:

- Which entry and exit survey questions have PREP grant recipients found to be difficult for their youth respondents to understand?
- How could these questions be improved?

Study Design

<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Topic guide for grant recipient focus groups	Respondents: Up to 60 PREP grant recipients Content: Questions around their experiences administering the current PREP participant entry and exit surveys, which items their respondents found difficult to understand or answer, and suggestions for revisions. Purpose: To identify and improve questions that respondents have found unclear	Mode: Virtual Duration: 1.5 hour

Other Data Sources and Uses of Information

Information collected through this effort will be used with planned pretesting activities, which will be submitted for review and approval under the Pre-testing of ACF Data Collection Activities umbrella generic (0970-0355).

A3. Use of Information Technology to Reduce Burden

The study team will conduct the focus group discussions with grant recipients via a video conferencing software, such as Webex or Zoom.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

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

The study team has scanned available SOGI measures and identified a set of items aligned with ACF's research priorities and the latest recommendations from OMB and the National Academies of Sciences, Engineering, and Medicine (NASEM)¹.

A5. Impact on Small Businesses

The study team will work closely with program staff to schedule the data collection activities and request only the information necessary for the activities.

A6. Consequences of Less Frequent Collection

This is a one-time data collection.

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. This first notice was published on August 11, 2023 (88 FR 54614) and provided a sixty-day period for public comment. The second notice published on December 14, 2023 (88 FR 86656) and provided a thirty-day period for public comment. ACF did not receive any substantive comments.

Consultation with Experts Outside of the Study

To develop the original PREP performance measures (OMB Control #0970-0398), ACF consulted with staff of Mathematica, Child Trends, and RTI International. For revisions to the measures, ACF also consulted internal FYSB and OPRE staff, selected PREP grantees, and FYSB and ACF leadership.

For revisions to the SOGI measures specifically, we have received feedback from PREP grantees and their FYSB federal project officers and consulted with the HHS LGBTQ+ Coordinating Committee and Research and Data Subcommittee as well as the NASEM report and OMB guidance:

- National Academies of Sciences, Engineering, and Medicine. 2022. *Measuring Sex, Gender Identity, and Sexual Orientation*. Washington, DC: The National Academies Press.
<https://doi.org/10.17226/26424>.
- Recommendations on the Best Practices for the Collection of Sexual Orientation and Gender Identity Data on Federal Statistical Surveys (OMB 2023)

¹ National Academies of Sciences, Engineering, and Medicine. 2022. *Measuring Sex, Gender Identity, and Sexual Orientation*. Washington, DC: The National Academies Press.
<https://doi.org/10.17226/26424>.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

A9. Tokens of Appreciation

No tokens of appreciation are proposed.

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

Personally Identifiable Information

We will recruit participants using an existing mailing list maintained by Mathematica for contacting PREP grant recipients. This information is maintained on Mathematica's secure network. The grant recipient focus groups will not be audio recorded, and no staff or grant names will be included in the reports to ACF.

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

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, and that their information will be kept private. As specified in the contract, the Contractor will comply with all Federal and Departmental regulations for private information.

Grant recipients will be informed that participation is voluntary and the decision to participate will not affect their grant. Participants will also be informed that nothing they say will be identified as theirs and they can refuse to answer any questions they do not wish to answer.

All notes will be stored on Mathematica's secure network. No one outside the study team will have access to the data. Only Mathematica staff working directly on this project have access to the project folder on the network where notes will be saved. All notes will be destroyed per contract requirements.

Data Security and Monitoring

The contractor shall protect respondents' privacy to the extent permitted by law and will comply with all federal and departmental regulations for private information. The contractor will ensure all employees receive training on data privacy issues and comply with all requirements. All Mathematica staff must sign an agreement to (1) maintain the privacy of any information from individuals, businesses, organizations, or families participating in any projects conducted by Mathematica; (2) complete online security awareness training when they are hired; and (3) participate in a refresher training annually.

The contractor will use encryption compliant with the Federal Information Processing Standard (Security Requirements for Cryptographic Module, as amended) to protect all sensitive information during storage and transmission. The contractor will securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the standard. The contractor will incorporate the standard into its property management and control system and establish a procedure to account for all laptop and desktop computers and other mobile devices and portable media that store or process sensitive information. The contractor will secure any data stored electronically in accordance with the most current National Institute of Standards and Technology requirements and other applicable federal and departmental regulations. In addition, the contractor's data safety and monitoring plan includes strategies for minimizing risk, to the extent possible including sensitive information on paper

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

records and for protecting any paper records, field notes, or other documents that contain sensitive information to ensure secure storage and limits on access.

No information will be given to anyone outside the study team and ACF.

A11. Sensitive Information ²

The focus groups do not request sensitive information from grant recipients.

A12. Burden

Explanation of Burden Estimates

The **Grant Recipient Focus Group Discussion Protocol** will be used during the virtual focus group discussions with PREP grant recipient staff. We anticipate conducting four groups with up to 20 people in each group. Each focus group discussion will last up to 90 minutes.

Estimated Annualized Cost to Respondents

The hourly wage rate represents the mean hourly wage rate for community and social service occupations (\$28.36) (National Occupational Employment and Wage Estimates, Bureau of Labor Statistics, Department of Labor, May 2023). To account for fringe benefits and overhead, we multiplied this by two.

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)	Average Hourly Wage Rate	Total Annual Respondent Cost
PREP grant recipient focus groups protocol	80	1	1.5	120	\$56.72	\$6,806.40

A13. Costs

There are no additional costs to respondents.

² 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.

**Alternative Supporting Statement for Information Collections Designed for
Research, Public Health Surveillance, and Program Evaluation Purposes**

A14. Estimated Annualized Costs to the Federal Government

The estimated total cost to the federal government is provided in Table A.3. This includes direct and indirect costs related to these focus groups. costs for planning, recruitment, collecting, processing, and analyzing the data, and preparing memorandums.

Table A.3. Estimated total cost by category

Cost Category	Estimated Costs
Hosting focus groups and collecting data	\$40,000
Publications/Dissemination (analysis)	\$10,000
Total/annual costs	\$50,000

A15. Reasons for changes in burden

This is for an individual information collection under the umbrella formative generic clearance for ACF research (0970-0356).

A16. Timeline

The study team expects to conduct these initial focus groups in September 2024. This effort will be followed by pretesting activities, to be submitted under OMB #: 0970-0355. The goal is to submit that request to OMB in early October to ensure these efforts can inform updates to ACF information collections as soon as possible.

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Appendix A: Email recruitment and reminders

Instrument 1: Grant Recipient Focus Group Discussion Protocol