## Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC) National Needs Assessment

### **Formative Data Collections for Program Support**

0970 - 0531

# **Supporting Statement**Part A - Justification

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Submitted by:
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Administration for Children and Families
U.S. Department of Health and Human Services

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#### A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for the Runaway and Homeless Youth Training and Technical Assistance Center (RHYTTAC) National Needs Assessment.

#### **Background**

The ACF Family and Youth Services Bureau (FYSB) RHYTTAC is responsible for assisting organizations in developing and implementing effective approaches to serve young people experiencing homelessness or are at-risk of experiencing homelessness. To meet this responsibility, RHYTTAC provides direct capacity building support for programs, delivers timely and relevant T/TA, and develops tools and resources for grantees. To be effective, RHYTTAC needs to be aware of the changing needs and demands of grantees to serve youth, so that the tools, resources, and trainings developed meet their need. The most comprehensive and efficient way to identify the needs of the grantees across the country is to administer a National Needs Assessment survey that asks questions about trainings and topics that are most relevant to their programs and those in which grantees are looking for T/TA. RHYTTAC's National Needs Assessment has been administered to all FYSB Runaway and Homeless Youth (RHY) grantees annually since 2021 to fulfill this need. Annual requests for feedback are necessary to account for evolving needs of grantees. Each year, FYSB submits the National Needs Assessment for review and approval by the Office of Management and Budget. As with previous submissions, this year's assessment survey instrument is similar to previous years, with minor changes to reflect the current time and events that may impact grantees.

#### Legal or Administrative Requirements that Necessitate the Collection

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

#### A2. Purpose of Survey and Data Collection Procedures

#### **Overview of Purpose and Approach**

The National Needs Assessment is intended to provide FYSB RHY grantees an opportunity to share with RHYTTAC and FYSB their T/TA needs. RHYTTAC and FYSB will use the results of the assessment to identify priorities for RHYTTAC T/TA for the following year, and to inform the agenda for the annual RHY National Training event. In addition to informing internal planning, the information will also be shared publicly with RHY grantees through a report published on the RHYTTAC website so that they may understand where their needs fit within the national context and, importantly, so they understand their input was received, noted, and will be used to guide future T/TA events. The assessment is administered through an online survey sent to all FYSB RHY grantees.

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

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

#### Questions

This year's assessment will ask grantees about the following:

- Background information about their organization,
- The RHYTTAC events used in the past year,
- Preferences for translating RHYTTAC resources into other languages\*,
- Training needs for leadership and operations,
- Topical training needs, organized around FYSB's four core outcome areas and some cross cutting topics.
- Needs for TTA around outcomes measurement and system collaboration.
- Which assessments and screening tools, and evidence-based and evidence-informed practices, each organization utilizes, and their training needs around them.
- Training needs during public health and community emergencies.

While the core of the assessment will remain unchanged each year, additional sections may be added or removed each year to account for events that may impact all grantees (i.e., operating during a global pandemic) and questions and/or response options may be edited. Future assessments will be submitted for review and approval.

#### A3. Improved Information Technology to Reduce Burden

RHY grantees will be asked to complete only one assessment per organization. To ensure the training needs are representative of the entire organization and not solely the individual completing the assessment, we have drafted messaging and offer support to guide organizations through this process. We will create a video that explains the assessment, its purpose and how results will be used, as well as how to effectively gather the organization's responses with minimal burden. We provide an editable PDF to all grantees to work on it and/or share with colleagues to collect responses in advance of entering the data into the online survey if that facilitates their process.

Following the launch of the assessment, we will host an online "office hour" to answer any questions that grantees may have as they prepare to complete the assessment. The survey instrument is programmed into REDCap, a secure web application for building and managing online surveys and databases. A single survey link is used to collect the survey data. Respondents may save their responses and return to complete the survey at a later time. The survey link may be shared with others in their organization as well, though only one survey per organization should be submitted.

#### A4. Efforts to Identify Duplication

There is no other source for the information requested through this assessment.

#### **A5. Involvement of Small Organizations**

<sup>\*</sup>This bullet is a new area for this year's assessment.

All FYSB RHY grantees will be asked to complete the assessment, including those who qualify as a small business under the U.S. Small Business Association's size standards for organizations in Child and Youth Services industry. The assessment has been designed to impose minimal burden on grantees and is intended to improve services provided to grantees.

#### A6. Consequences of Less Frequent Data Collection

The National Needs Assessment is an annual assessment that will inform the development of T/TA for the following year. By conducting the assessment annually instead of once a grant period, we are able to add and remove certain time sensitive sections and be more responsive to organizations' needs.

#### A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

#### A8. Federal Register Notice and 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 notice in the Federal Register announcing the agency's intention to request an OMB review of the overarching generic clearance for formative information collection. This notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received. A subsequent notice was published on July 13, 2022 (87 FR 41723) and provided a thirty-day period for public comment. During the notice and comment period, no substantive comments were received.

#### Consultation with Experts Outside of the Study

We are not conducting consultation with experts outside the study.

#### **A9.** Incentives for Respondents

No incentives for respondents are proposed for this information collection.

#### A10. Privacy of Respondents

Chapin Hall at the University of Chicago manages specific RHYTTAC activities, including conducting the National Needs Assessment. As specified in the contract between Chapin Hall and Youth Collaboratory, Chapin Hall will protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information.

<sup>&</sup>lt;sup>1</sup> See <a href="https://www.sba.gov/sites/default/files/2019-08/SBA%20Table%20of%20Size%20Standards">https://www.sba.gov/sites/default/files/2019-08/SBA%20Table%20of%20Size%20Standards</a> Effective %20Aug%2019%2C%202019 Rev.pdf for table and guidelines.

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.

Further, Chapin Hall's research data are stored on HITRUST Certified Red Hat Enterprise Linux servers. The servers are protected by a network firewall. Patches are regularly applied to and maintained on the servers. Access is limited to users with Institutional Review Board (IRB) approval and stated need. The principle of least privilege is followed—providing a user account only those privileges that are essential to perform its intended function. Security controls are regularly reviewed following National Institute of Standards and Technology (NIST) SP 800-53r4 guidelines to ensure that appropriate physical, administrative and technical controls are in place to guarantee confidentiality, integrity and availability of all data. Chapin Hall shall ensure that all of its employees who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. All researchers involved in the data collection and analysis have complete Collaborative Institute Training Initiative (CITI) Human Subjects Research training.

As specified in the evaluator's contract, Chapin Hall 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. Chapin Hall shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. Chapin Hall shall: ensure that this standard is incorporated into their 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 NIST requirements and other applicable Federal and Departmental regulations. No personally identifiable information will be collected in the study.

#### **A11. Sensitive Questions**

There are no sensitive questions contained in the proposed assessment.

#### A12. Estimation of Information Collection Burden

#### Annual Burden Estimates

We will administer the needs assessment once to all RHY grantees (~325). Based on prior experience with similar needs assessments for these grantees including last two years administering the RHYTTAC National Needs Assessment, we estimate the time per grantee response to be about 30 minutes. We are estimating a 68% response rate, for an estimated 220 grantees. Since it is likely more than one individual will be involved with the response, we estimate about 440 actual respondents contributing to the 220 responses. See Supporting Statement B for more information about response rate for grantees.

Instrument	Estimated	Total	Total	Average	Total/	Average	Total
	Total	Number of	Number of	Burden	Annual	Hourly	Annual
	Number of	Grantees	Responses	Hours Per	burden	Wage	Cost

	Respondents		Per Respondent	Response	hours		
Needs Assessment Survey	440	220	1	0.5	110	\$36.16	\$3,997.60

#### Annual Cost Estimates

To calculate the annualized cost to respondents for the hour burden, we assume that the typical respondent will be a social and human service assistant. Based on data on our expected respondents from the Bureau of Labor Statistics, we use a mean hourly wage of \$18.08.<sup>2</sup> The wage rate was multiplied by 2 to account for fringe benefits and overhead for an average hourly wage of \$36.16.

#### A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

#### A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be \$30,155. This includes direct and indirect costs of data collection.

#### A15. Change in Burden

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

#### A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

The following is the current 2023 plan and time schedule:

- Following OMB Approval: Launch survey and host online "office hour" to answer questions organizations may have about completing the survey
- 4-6 Weeks after Launching Survey: Close survey
- Summer 2023, after survey closes: Survey data analysis and report writing.
- September 2023: Finalize report for ACF and grantees

#### A17. Reasons Not to Display OMB Expiration Date

All instruments will display the expiration date for OMB approval.

#### A18. Exceptions to Certification for Paperwork Reduction Act Submissions

<sup>&</sup>lt;sup>2</sup> The median annual wage for Social and Human Service Assistants occupation in May 2021 was \$37,610. This computes to an hourly wage of \$18.08 (using the formula made permanent by the Consolidated Omnibus Budget Reconciliation Act of 1985 (Public Law 99-272, April 7, 1986) to divide the annual rate of pay by 2,087 hours.) Wage data from <a href="https://www.bls.gov/ooh/community-and-social-service/home.htm">https://www.bls.gov/ooh/community-and-social-service/home.htm</a>.

No exceptions are necessary for this information collection.