

# Runaway and Homeless Youth Learning Agenda Support

## Formative Data Collections for Program Support

0970 – 0531

## Supporting Statement

### Part A

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Submitted By:  
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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 a generic information collection under the umbrella generic, Formative Data Collections for Program Support (0970-0531).
- **Description of Request:**

The Runaway and Homeless Youth Learning Agenda Support (RHY LAS) project is intended to expand the knowledge base of the Family and Youth Services Bureau, its federal partners, and youth service providers nationally by documenting the implementation of the RHY Prevention Demonstration Program (RHY PDP). To accomplish its objective, RHY LAS includes a multisite process evaluation to understand the implementation of prevention services and interventions across the 10 demonstration sites.

The process evaluation includes (1) virtual quarterly site meetings, (2) listening sessions, (3) site visits (including key respondent interviews and focus groups with young people), and (4) document review and analysis. The data are intended to inform the implementation of the RHY PDP, particularly the processes and/or practices, and inform future efforts to prevent youth homelessness. Given the research questions, primarily qualitative methods, and presumed variability among the RHY PDP sites, the findings are not expected to be broadly generalizable. In addition, the information collected is not intended to be used as the principal basis for public policy decisions.

- **Time Sensitivity:**

The first cohort of 10 RHY PDP sites began planning over a year ago and many started implementing their programs in summer 2024. To enable observation of the RHY PDP implementation and data collection while early implementation facilitators and barriers can be documented, ACF plans to begin data collection upon OMB approval. The goal is to begin data collection this summer (2025).

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### A1. Necessity for Collection

Pursuant to the Runaway and Homeless Youth Act (34 USC § 11101 et seq), the Administration for Children and Families (ACF) Family and Youth Services Bureau (FYSB) funds over 640 grants to public and non-profit organizations to support street-based services, emergency and longer-term-shelter, and counseling and supportive services to youth and young adults who have run away or who are at risk of or experiencing homelessness. In FY 2024, FYSB launched its first demonstration of the RHY Prevention Demonstration Program (RHY PDP) to support the design and delivery of community-based demonstration initiatives to prevent youth and young adults from experiencing homelessness. The goal of the RHY PDP is to expand existing partnerships with organizations focusing on education, health, mental health, child welfare, family support, substance abuse prevention/intervention, domestic violence/crisis intervention, law enforcement, courts, legal services, and public benefits agencies, as well as with non-traditional partners. Recent reviews, however, find little evidence to inform the design of youth homelessness prevention programs<sup>1</sup>. ACF contracted with a research team at the Urban Institute (contractor) to complete a process evaluation of the RHY PDP. This process evaluation aims to provide FYSB with feedback on the demonstration to better understand the implementation of prevention services and interventions across the 10 RHY PDP sites and to inform ways to support future efforts to prevent youth homelessness.

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

### A2. Purpose

#### *Purpose and Use*

The main purpose of the RHY LAS multisite process evaluation is to understand the implementation of prevention services and interventions across the 10 RHY PDP sites. The process evaluation uses a multi-disciplinary, multi-method approach, requiring data collection from multiple constituents across systems. This approach has potential to inform both the design and implementation of future RHY PDPs, while contributing valuable insights to the broader field of youth homelessness prevention.

Data collected through this request is expected to be incorporated into efforts to develop and improve future prevention programs and the youth homelessness field, ensuring ACF is responsive to the needs of these types of programs. The products will be developed by summarizing and synthesizing information from the instruments and methods described in this application, including site meetings, listening sessions, site visits (key respondent interviews and focus groups), and document review and analysis. The information will provide in-depth understanding of the design and development of youth homelessness prevention efforts that states, territories, and tribes are undertaking. Products will support current grantee sites by providing them with information about how other communities approached the prevention demonstration, enabling cross-site learning and program implementation. Products will include reports, briefs, and infographics that summarize program design processes, program components, partnerships, youth input, implementation (including facilitators and barriers), and site efforts toward sustainability. In partnership with OPRE, information will be shared with sites, published on the OPRE and Urban Institute websites (following review and approval), which will enable a

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<sup>1</sup> Morton, Matthew H., Amy Dworsky, Jennifer Matjasko, Susanna Curry, David Schlueter, M.A. Chavez, and Anne Farrell. 2017. "Prevalence and correlates of youth homelessness in the United States." *Journal of Adolescent Health* 14-21.

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range of stakeholders to access materials for learning purposes. Findings are also meant to inform ACF activities more broadly (e.g., learning agendas and research priorities) and may be incorporated into presentations that are shared internally within ACF's offices or made public without attributing findings to any specific site, state, territory, or tribe. All products resulting from this work will include notes on the limitations of design and data (as described later in the *Limitations of Study Design* subsection).

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.

### *Research Areas*

The RHY LAS process evaluation has the following six research areas:

1. Coordination among site partners
2. Leading in partnership with youth and young adults with experience of homelessness
3. Community capacity expansion and enhancement
4. Program reach
5. Providers' experiences of the RHY PDP
6. Youth experiences of the RHY PDP

The process evaluation seeks to answer several specific research questions under these research areas. The full list of research questions for each research area and their corresponding data collection activities can be found in Appendix A – RHY LAS Research Questions.

### *Study Design*

Data collection for the six research areas will rely on four primary activities: (1) virtual quarterly meetings with RHY PDP grantee site staff; (2) listening sessions; (3) site visits to conduct key respondent interviews with grantees, providers, and community partners and focus groups with young people; and (4) document review and analysis to further collect, distill, and organize information on project activities and progress<sup>2</sup>.

There is some overlap across data collection activities and respondents; this is intentional as the contractor seeks to obtain cross-constituent input and use multiple approaches to minimize method bias and obtain a range of feedback. See descriptions below and Table 1 for details on data collection instruments, respondents, purposes, and mode and duration for each data collection activity. All data collection instruments detail procedures for obtaining informed consent. This includes informing respondents how their information will be used for the evaluation, how their privacy will be protected, and the risks and benefits of their participation.

**Site Teams:** The contractor consists of both senior and early-career professionals, each assuming specific roles in conducting the process evaluation. To facilitate data collection, the contractor will assign two research staff to each demonstration site, forming designated 'site teams' that will serve as the contractor's primary point of contact. By maintaining a clear and consistent communication channel, the contractor aims to build strong rapport with RHY PDP grantee site staff while minimizing the burden on sites to engage with and provide information for the evaluation—ultimately enhancing the quality of information shared. Each contractor site team will be assigned to three to four RHY PDP grantee sites,

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<sup>2</sup> This effort does not impose burden on respondents and therefore is not included as an "information collection" under the Paperwork Reduction Act for this request.

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allowing contractor staff to compare activities and processes across sites, connect lessons learned, and optimize staffing efficiencies.

### *Data Collection Activities*

**Virtual Quarterly Site Meetings:** To enable ongoing communication, site teams will have quarterly 60-minute virtual Zoom meetings with RHY PDP grantee site staff. The contractor anticipates one RHY PDP grantee site staff member per site will participate, for a total of 10 respondents. Site teams will facilitate meetings using the Quarterly Site Meeting Guide (Instrument 1) to:

- Build relationships with key grantee staff at each site and provide a primary point of contact for information and coordination on the broader evaluation.
- Gather information on the site's ongoing activities, including primary tasks, partners, milestones, and challenges.
- Explore site reports on implementation progress, challenges experienced, and strategies for managing those challenges.

**Listening Sessions:** The contractor will use the Listening Session Topic Guide (Instrument 2) to hold 90-minute virtual listening sessions via Zoom with a wide range of local RHY PDP partners. This will enable documentation of the strength, development, and quality of partnerships and the role of the RHY PDP in the community. Contractor site teams will coordinate with RHY PDP grantee site staff to recruit participants.

The listening sessions will focus on partner roles, collaboration and the formalization of partnerships, and RHY PDP program design and structure. The contractor will aim to cover the following topics in the listening sessions:

1. Types of partners
2. Decision-making process and collaboration
3. Roles and responsibilities within partnerships
4. Benefits of RHY PDP partnership
5. Challenges with RHY PDP partnership
6. Collaboration beyond RHY PDP

To maximize participation, the contractor will schedule two 90-minute listening sessions at times convenient to participants across six time zones. Sessions will occur within a two week period to minimize response variation due to timing (e.g., ensure sites are at approximately the same point in implementation). The number of participants will vary based on the number of active local RHY PDP partners within each site, but the contractor anticipates a maximum of 10 participants per site for a total of 100 participants across all RHY PDP sites (each participant will only participate in one of the two listening sessions). Sessions will be audio recorded, with permission.

**Site Visits:** Contractor site teams will visit each site once to observe key partnership activities and meetings, interview RHY PDP project partners, and conduct focus groups with young people. Contractor site teams will coordinate with RHY PDP grantee site staff to recruit participants. Site visits will focus on the following activities:

- Approximately eight key respondent interviews with RHY PDP grantee staff, providers, and community partners (approximately 60 minutes each). Interviews will focus on RHY PDP site implementation, coordination, and provider experiences.

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- Two focus groups with young people (approximately 90 minutes each). Focus groups will address youth experiences with the RHY PDP co-design process and experiences within RHY PDP service receipt.

Key Respondent Interviews

Using an interview protocol (Instrument 3), site teams will conduct key respondent interviews during site visits. Site teams will work with RHY PDP grantee contacts to prioritize partners that represent RHY PDP housing or service providers as well as other community partners in the housing and homelessness, corrections and law enforcement, child welfare, school, and health (physical, mental, behavioral, etc.) systems for the interviews. As noted, while the contractor intends to reach a broader group of respondents through the listening sessions, there will be some intentional overlap in content and respondents across the listening sessions and the key respondent interviews.

Interviews will be semi-structured conversations with topics and questions customized to each respondent and relevant to the ongoing project activities. Interviews will last approximately 60 minutes and will be audio recorded, with permission. The contractor anticipates that all respondents will be professionals and interviews will take place in their offices or another private location of their choosing and mutual convenience. The contractor will not ask any sensitive questions.

Youth Focus Groups

During each site visit, site teams will use a focus group protocol (Instrument 4) to conduct two 90-minute focus groups with up to 12 young people each. Site teams will first ask each site’s RHY PDP contact whether it is possible to convene a focus group with the local Youth Advisory Board (YAB) that is already participating in the RHY PDP. For the second focus group, site teams will work with the RHY PDP contact to identify partners willing to recruit RHY PDP youth participants for focus group participation. If site teams are not able to conduct the first focus group with their YAB, both focus groups will include young people already participating in the RHY PDP. Topics will cover RHY PDP co-design efforts (YAB focus group respondents only), experiences in the RHY PDP, and other issues related to program implementation. To protect participant privacy and mitigate potential discomfort, focus groups will not be audio recorded.

**Table 1. Data Collection Activity Details**

<i>Data Collection Activity</i>	<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Virtual Quarterly Site Meetings	Instrument 1: Quarterly Site Meeting Guide	<p><b>Respondents:</b> RHY PDP grantee site staff</p> <p><b>Content:</b> RHY PDP grantee site activities</p> <p><b>Purpose:</b> (1) Build relationships with project managers and other key RHY PDP grantee site staff and provide a primary point of contact for information and coordination on the national evaluation; (2) gather information on the site’s ongoing work, including primary tasks, partners, milestones and challenges; and (3) explore site reports on implementation progress, challenges experienced, and how challenges are managed.</p>	<p><b>Mode:</b> Video conference call (via Zoom)</p> <p><b>Duration:</b> 60 minutes</p>

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<i>Data Collection Activity</i>	<i>Instrument</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Listening Sessions	Instrument 2: Listening Session Topic Guide	<p><b>Respondents:</b> RHY PDP grantee site staff and professional staff from local RHY PDP project partners</p> <p><b>Content:</b> Partnerships and the role of the RHY PDP in grantee communities</p> <p><b>Purpose:</b> Document (1) strength, (2) development, and (3) quality of RHY PDP partnerships and the role of the RHY PDP in the grantee communities.</p>	<p><b>Mode:</b> Video conference call (via Zoom)</p> <p><b>Duration:</b> 90 minutes</p>
Site visits - Key Respondent Interviews	Instrument 3: Site Visit Interview Protocol – Key Respondent Interviews	<p><b>Respondents:</b> RHY PDP grantee site staff and professional staff from local project partners</p> <p><b>Content:</b> RHY PDP site implementation, coordination, and provider experiences</p> <p><b>Purpose:</b> Collect data on (1) partner coordination and community capacity expansion; (2) partnership with youth and young adults with experience of homelessness; (3) providers' experience of the RHY PDP; and (4) providers' perspectives on the youth experiences participating in the RHY PDP;</p>	<p><b>Mode:</b> In-person interviews</p> <p><b>Duration:</b> 60 minutes</p>
Site visits - Youth Focus Groups	Instrument 4: Site Visit Focus Group Protocol – Youth Focus Groups	<p><b>Respondents:</b> RHY PDP local youth advisory board members and young people who have received RHY PDP services</p> <p><b>Content:</b> Youth experiences with the RHY PDP co-design process and experiences with RHY PDP service receipt</p> <p><b>Purpose:</b> Collect data on youth experiences with (1) RHY PDP efforts to lead in partnership with youth and young adults with experience of homelessness and (2) the RHY PDP programs themselves.</p>	<p><b>Mode:</b> In-person focus groups</p> <p><b>Duration:</b> 90 minutes</p>

*Limitations of the Study Design*

There are several limitations to the study design; these will be noted in products, as applicable.

- The study is limited to 10 grantees in the demonstration which are not geographically or programmatically representative of the universe of organizations serving young people at risk of experiencing homelessness.
- The people selected for participation in the listening sessions, key respondent interviews, and focus groups are not representative of all people who have interacted with the RHY PDP projects. For example, young people recruited for focus groups are unlikely to be young people who were unsuccessful in the program as the recruiting agency likely has no way of effectively contacting those young people. Another example would be a staff person who was involved in the RHY PDP project planning period but left a partner agency to be replaced by a staff person who only participated in implementation of the RHY PDP.

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- The contractor will only conduct listening sessions once during the evaluation period. This limits the data collection to a single snapshot in time and the contractor will therefore not be able to measure changes over time.
- The contractor will only conduct site visits once at each site during the evaluation period. This limits the data collection with respondents who do not participate in quarterly site meetings. As such, findings from the RHY PDP process evaluation are not meant to be generalizable.

### *Other Data Sources and Uses of Information*

**Document Review and Analysis:** The contractor will review key project materials produced by each RHY PDP grantee site and relevant partners. These documents may include the RHY PDP grant application, the prevention plan, press releases or other public communications, existing literature reviews and syntheses, and any implementation materials such as operations and partnership meeting notes, grantee reports, and local evaluation plans and reports.

Review of the materials will enable the contractor to identify key themes and unique site experiences related to project activities and components, providing valuable insights into implementation facilitators and barriers that may inform future activities. For example, numerous contextual factors influence and interact with project designs and implementation. This can include how a project is situated in community, community and youth characteristics, how housing and homelessness systems historically interacted with other youth-serving entities (e.g., health, behavioral health, justice, child welfare), and other local and regional factors. A cross-site, thematic analysis will shed light on these factors and how they affect planning and implementation.

Findings from the materials review will be combined with findings from data analysis across the other primary data collection methods (i.e., virtual quarterly site meetings, listening sessions, key respondent interviews, and youth focus groups), developing themes and trends within and across sites, and summarizing them. The contractor will use the data collection activities in concert with each other to further understand implementation facilitators and barriers and otherwise respond to the research questions (in Appendix A).

### **A3. Use of Information Technology to Reduce Burden**

The data collection plan is designed to efficiently obtain information and minimize respondent burden. The research team will gather some data via a virtual meeting platform when in-person meetings are not practicable and to reduce the need for respondents to travel and report to an interview session in person. With respondents' permission, the research team will audio record the interviews and focus groups to support note taking and analysis. The audio recording will reduce burden by minimizing the need to follow up with respondents to clarify notes.

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

There have been no previous efforts to collect data from the organizations implementing RHY PDP.

### **A5. Impact on Small Businesses**

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RHY PDP projects are operated by small community-based organizations. The contractor will provide clear communication, guidance, and support throughout the data collection process, from emails and phone calls through coordination, scheduling, and data collection. These efforts will serve to minimize the burden on small organizations.

### **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 a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice. The umbrella generic will be submitted for an extension in the upcoming months. A related 60-day comment period ended on June 27, 2025 (90 FR 17603). ACF did not receive any comments. This GenIC will be included in the extension request to OMB, which will be accompanied by a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection request to extend approval of the umbrella generic and multiple ongoing data collections approved under the umbrella generic.

#### *Consultation with Experts*

The contract team developed the instruments and protocols in consultation with staff from FYSB and OPRE, as well as colleagues at the Urban Institute, Chapin Hall at the University of Chicago, and other homelessness experts.

### **A9. Tokens of Appreciation**

No tokens of appreciation are proposed for the information collection efforts, but to recognize the value of the input provided by youth participants we do propose to offer these participants an honorarium, as described in A13.

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

#### *Personally Identifiable Information*

Personally identifiable information (PII), specifically names and email addresses, will be collected and stored on government furnished equipment (GFE) or a secure ACF Box folder to coordinate the quarterly site meetings, listening sessions, and site visit key respondent interviews. Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individual's personal identifier.

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### *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, the contractor will comply with all Federal and Departmental regulations for private information.

Before each interview, site teams will explain the evaluation and how interview findings will be used and inform respondents that they will be free to skip any question they do not want to answer. Site teams will request permission to audio record each interview as a backup to interview notes; respondents will be free to decline the recording if they prefer handwritten notes only. Audio recordings will be permanently destroyed as soon as the contractor has a complete set of notes and completed any verification or clarification that is needed. Handwritten notes will be destroyed at the end of the evaluation contract.

### *Data Security and Monitoring*

The Urban Institute requires that all project teams designate a data security officer to ensure all data security procedures are followed. The contractor's co-PI will serve as the data security officer. The research conducted using notes from listening sessions, interviews, and focus groups is subject to federal human subject review standards to protect the privacy of all research subjects, including persons interviewed. The contractor will follow strict data security protocols. All notes and recordings will be handled internally by contractor staff who have signed the Urban Institute's staff confidentiality pledge. Data access will be limited to contractor staff who need it for research purposes and who have agreed in writing to maintain data privacy. Copies of signed pledges are kept in a secure location.

The contractor will store all raw and summarized data according to the Urban Institute's IRB protocol and ACF requirements, including proper password-protection and encryption as required for any files containing PII. The procedures described below have been approved by the Urban Institute's IRB.

- The contractor will maintain RHY PDP grantee and partner professional staff contact information on GFE or the ACF Box project folder.
- The contractor will not maintain any youth contact information. Site teams will immediately destroy lists of first names and last initials of young people they receive from recruiting partners when they complete the focus group.
- Listening session and quarterly site meeting notes with professional staff will be saved on the ACF Box project folder as the respondents are not classified as vulnerable and are not answering potentially sensitive topics.

For in-person site visit key respondent interviews and youth focus groups, site teams will use encrypted recorders for audio recordings and encrypted laptops for notes. Recorders, laptops, and signed paper consent forms will be kept in possession of contractor staff and locked in secure locations like locked a hotel room while traveling. Once connected to a secure internet source, contractor staff will upload recordings directly to GFE. Access to the ACF Box project folder will be limited to contractor team members who have signed a pledge of confidentiality and who need access to conduct analyses. Upon return from site visits, contractor staff will temporarily store paper forms in a locked cabinet in a secure location (i.e., locked office drawer), until the paper forms are scanned to create electronic copies stored on the ACF Box project folder), and the originals destroyed (within 30 days of site visits).

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The contractors plan on using an Urban Institute-approved secure service to transcribe discussion interview and focus group audio files into text. Contractor staff will directly upload the audio files from GFE or the ACF Box project folder to the transcription service's secure FTP portal. All security protocols for the transcription service will be vetted and approved by Urban's Technology and Data Sciences division. The contractor will store the transcripts on GFE or the ACF Box project folder. The contractor will confirm that all our data have been deleted from the transcription service's servers (including backups) within 30 days and we will permanently delete audio recordings from all devices as well.

The contractor will use GFE-accessible software (NVivo) to analyze interview and focus group transcripts for emerging themes and summarized for dissemination. As early as possible in the process, the contractor will remove any inadvertent identifying information contained (e.g., a participant mentions their location) in these materials. Transcript analysis will be preceded by verification of all quotes that might be extracted (and included in the report) using audio recording but will remain anonymous. Contractor co-PIs will ensure that PII is not included in study reports or related materials. Project findings and reports prepared for dissemination will not contain information that could reasonably be used to identify an individual.

At the end of the project, the contractor will ensure that all data and data summary files containing PII are de-identified per proper IRB and HHS protocol before transferring them to HHS, along with a detailed list of all file names and content summaries. The contractor will destroy all data files and materials that reside on its own confidential network drives and contain PII within one year of project completion.

### **A11. Sensitive Information<sup>3</sup>**

No questions of a sensitive nature will be collected from RHY PDP grantee site staff as part of quarterly site meetings, listening sessions, or site visit key respondent interviews with RHY PDP grantee site staff, providers, and community partners. These procedures have been approved by the Urban Institute's IRB.

Although youth focus groups will not include questions of a sensitive nature, sensitive issues could arise without prompting from the contractor's site team. Prior to beginning focus groups, site team members will read aloud the consent, which includes discussion of risks of participation. The site team members will seek written consent for youth over age 18 and assent for youth under age 18.

Given the circumstances of the young people that the site teams will be recruiting, the contractor has requested and received approval for a waiver of parental consent for participants who are under the age of 18 from the Urban Institute's IRB (see Appendix B).

For youth who are experiencing housing instability or homelessness, parent or guardian permission is not a reasonable requirement. The most cited reason for youth homelessness is family conflict, meaning even if a youth is still in contact with a parent, youth engaging in these programs are likely seeking temporary refuge from a variety of traumatic, unhealthy situations, many of which involve incidents of

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<sup>3</sup> 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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abuse or neglect committed by parents or guardians.<sup>4</sup> These common circumstances make it inappropriate to ask for parent or guardian consent. Additionally, these young people have an increased likelihood of being disconnected from family and unable to obtain consent from a parent. If the recruiting agency is aware of a safe parent/guardian to approach for consent, parental consent will be obtained using a parental consent form. The sites will be cognizant of the consent status and availability of a suitable parent/guardian because of their own consent policies and practices under law.

There is a small risk that some young people participating in focus groups may reveal negative opinions of staff, experiences, programs, or peers and there is a small risk that respondent comments may be communicated beyond the discussions (e.g., if anonymity and privacy are not upheld uniformly by other participants). This has the potential to complicate service delivery. The site team will minimize this risk by (1) minimizing these disclosures and (2) minimizing the potential impacts of these disclosures on service delivery. First, the site team will repeatedly emphasize that participation is completely voluntary and reiterate that participants are free to leave and/or refrain from answering any questions that cause discomfort. The site team will also emphasize that participants should not share information that was shared in the group outside of it. Second, site teams will embed repeated reminders for agency staff that any statements made during the focus groups (and other data collection efforts) should not and may not affect young people's services or housing. Lastly, the contractor will not attach names or any identifying characteristics to quotes when presenting findings from the evaluation. Site teams will make this clear during the consent process.

### **A12. Burden**

#### *Explanation of Burden Estimates*

Quarterly site meetings will be held four times per year, for a total of 8 meetings over a two-year period. An estimated 10 respondents in management, supervisory, or administrative positions in RHY PDP grantee organizations will participate in each one hour interview .

The listening sessions will occur twice during the evaluation period with a total of 100 participants in management, supervisory, or administrative positions at RHY PDP grantee and partner agencies. Each participant will complete one 90-minute listening session.

Key respondent interviews will occur once at each site during the evaluation with 80 respondents in management, supervisory, or administrative positions at RHY PDP grantee and partner agencies. The data collection does not recur annually and there will not be the same number of site visits each year.

Youth focus groups occur once at each site during the evaluation and last 90 minutes. An estimated 240 young people will participate in focus groups with an estimated burden of 1.5 hours per respondent per focus group.

There may be overlap across data collection activities, specifically some respondents may participate in a mix of quarterly site calls, virtual listening sessions, and site visit interviews. In these instances, a respondent would experience the burden associated with each activity. It is difficult to estimate with any

<sup>4</sup> According to the [SchoolHouse Connection](#), numerous US states have laws enabling minors experiencing homelessness to give informed consent, enter into housing contracts, and otherwise agree to participate in their own care and planning. The McKinney-Vento Homeless Assistance Act of 1987 enables unaccompanied youth (minors) to register themselves for school even without paperwork and the HHS Office for Human Research Participants enables IRBs to waive consent when parental or guardian permission is not a reasonable requirement to protect the subjects (for example, neglected or abused children), assuming that appropriate mechanisms are in place.

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precision how many individuals would participate in more than one activity, and individuals have the right to decline. We assume that there could be up to 20% of all participants responding in more than one activity. Since data collection efforts vary on how frequently they occur and when, annual burden has been calculated by dividing the total burden by the estimated timeframe for data collection, which is about 2 years (September 2025 - September 2027).

*Estimated Annualized Cost to Respondents*

To compute the estimated annual cost, the contractor multiplied the total annual burden hours by the average hourly wage for each respondent based on the expectation that the typical key project partner role is either a management or support role using the average of the most recent median hourly wages from the Bureau of Labor Statistics, Occupational Employment Statistics (May 2024). According to the Bureau of Labor Statistics, the average hourly wage for {either community services manager or community and social specialist} is \$40.01. To account for fringe benefits and overhead, the hourly wage was multiplied by two for a total of \$82.78 per hour.

There is no annual estimated cost for young people participating in focus groups as part of interviews as young people are non-professional respondents and do not have an hourly wage. As noted above in A9, youth will receive an honorarium for their focus group participation.

**Table 2. Estimated Cost Burden by Data Collection Instrument**

<i>Instrument</i>	<i># Respondents (total over request period)</i>	<i># Responses per Respondent (total over request period)</i>	<i>Avg. Burden per Response (in hours)</i>	<i>Total Burden (in hours)</i>	<i>Annual Burden (in hours)<sup>5</sup></i>	<i>Average Hourly Wage Rate<sup>6</sup></i>	<i>Total Annual Respondent Cost</i>
Instrument 1: Quarterly Site Meeting Guide	10	8	1	80	40	\$82.78	\$3,311
Instrument 2: Virtual Listening Session Topic Guide	100	1	1.5	150	75	\$82.78	\$6,209
Instrument 3: Site Visit Interview Protocol – Key Respondent Interviews	80	1	1	80	40	\$82.78	\$3,311
Instrument 4: Site Visit Focus Group Protocol – Youth Focus Groups	240	1	1.5	360	180	N/A	\$0
Totals:	430			670	335		\$12,831

**A13. Costs**

To recognize the value of the input provided by youth participants and to help facilitate participation and affirm that contributions from those with experience in the programs of interest are as valuable as those from other experts, we plan to provide a \$40 honorarium to young people for attending the 90-minute in-person focus group. This practice is in keeping with guidance on compensating experts<sup>7</sup> with

<sup>5</sup> Since data collection efforts vary on how frequently they occur and when, annual burden has been calculated by dividing the total burden by the estimated timeframe for data collection, which is about 2 years (September 2025 - September 2027).

<sup>6</sup> From the US Bureau of Labor Statistics, [Occupational and Employment Wages](#), 2024.

<sup>7</sup> Skelton-Wilson, Syreeta, Madison Sandoval-Lunn, Xiaodong Zhang, Francesca Stern, and Jessica Kendall. 2021. “Methods and Emerging Strategies to Engage People with Lived Experience: Improving Federal Research, Policy, and Practice.” Washington,

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experience of housing instability or homelessness and from feedback obtained by the contractor from youth-serving organizations and scholars across multiple states that the amount is an appropriate recognition for their contribution<sup>89</sup>.

**A14. Estimated Annualized Costs to the Federal Government**

Table 3 summarizes the estimated total and annualized costs. Annual costs are estimates based on the total costs over the timeframe for data collection efforts, including dissemination (26 months). **Table 3.**

**Estimated Annualized Project Costs**

<i>Cost Category</i>	<i>Estimated Costs</i>
Field Work	\$127,940
Publications/Dissemination	\$174,265
Youth Honoraria	\$3,200
<b>Total costs over the request period</b>	<b>\$305,405</b>
<b>Annual costs</b>	<b>\$152,702</b>

**A15. Reasons for changes in burden**

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

**A16. Timeline**

Data collection will occur from approximately September 2025 to September 2027, pending OMB approval.

**Table 4. Proposed Timeline of Activities**

<i>Activity</i>	<i>Approximate Dates</i>
Document reviews	September 2024-September 2027
Receive OMB clearance for process study.	September 2025
Quarterly meetings with RHY PDP grantee site staff	September 2025-September 2027
Schedule and conduct listening sessions with RHY PDP grantee and partner staff	October-December 2025
Tentatively schedule site visits beginning in late 2025 or early 2026, depending on site availability; conduct site visit key respondent interviews and focus groups across all 10 sites.	November-December 2025 to approximately August 2026
Provide first annual briefing to ACF	December 2025
Provide second annual briefing to ACF	December 2026
Draft final report for OPRE review	September 2027
Finalize report for publication and provide final briefing to ACF	November-December 2027

DC: ICF.

<sup>8</sup> Olivier, J., & Russell, L. (2023). Authentic youth engagement within organizations: What does it look like in practice. Chapin Hall at the University of Chicago.

<sup>9</sup> Office of Population Affairs. (2024). Meaningful Youth Engagement. Washington, DC: Office of Population Affairs. Retrieved from: <https://opa.hhs.gov/adolescent-health/positive-youth-development/meaningful-youth-engagement>.

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**A17. Exceptions**

No exceptions are necessary for this information collection.

**Attachments**

- Appendix A: RHY LAS Research Questions
- Appendix B: RHY LAS Process Study Data Collection IRB Full Approval
- Instrument 1: Quarterly Site Meeting Guide
- Instrument 2: Listening Session Topic Guide
- Instrument 3: Site Visit Interview Protocol – Key Respondent Interviews
- Instrument 4: Site Visit Focus Group Protocol – Youth Focus Groups