Human Trafficking Youth Prevention Education (HTYPE) Demonstration Grant Program Implementation Surveys

Formative Data Collections for Program Support

0970 - 0531

Supporting Statement

Part A - Justification

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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 Human Trafficking Youth Prevention Education (HTYPE) Demonstration Grant Program Implementation Surveys under the Formative Data Collections for Program Support (0970-0531).

ACF serves as the lead U.S. Department of Health and Human Services (HHS) agency to combat trafficking and modern forms of slavery by administering anti-trafficking programs through grants and contracts and collaborating with federal, state, tribal, and local governmental and nongovernmental organizations. The ACF Office on Trafficking in Persons (OTIP) provides overall leadership of anti-trafficking programs and services under the purview of ACF, including implementation of authorities under the Victims of Trafficking and Violence Protection Act of 2000, as amended; Preventing Sex Trafficking and Strengthening Families Act of 2014; the Justice for Victims of Trafficking Act of 2015; and, the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018.

OTIP provides funding for local educational agencies (LEAs) to develop and implement programs to prevent human trafficking victimization through the provision of skills-based human trafficking training and education for school staff and students through the Human Trafficking Youth Prevention Education (HTYPE) Demonstration Grant Program, as specified in Section 101(a)(2)(B) of the Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018 (22 U.S.C. 7104(b)(2)).

This proposed information collection includes four survey instruments that grantees will use to collect the data needed to fulfill post-award program performance reporting requirements. The HTYPE Demonstration Grant Program performance indicators were approved under the Generic Program-Specific Performance Progress Report (PPR) (OMB #: 0970-0490) with the title: Human Trafficking Youth Prevention Education (HTYPE) Demonstration Grant Program Performance Indicators (See Attachment A).

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 related to program implementation, the development or refinement of program and grantee processes.
- Planning for provision of programmatic or evaluation-related training or technical assistance (T/TA).

Legal or Administrative Requirements that Necessitate the Collection

This collection of information fulfills post-award program performance reporting requirements for HTYPE grantees.

A2. Purpose of Survey and Data Collection Procedures

Purpose and Use

The primary purpose of the HTYPE Demonstration Grant Program is to fund LEAs to develop and implement programs to prevent human trafficking victimization through the provision of skills-based human trafficking training and education for school staff and students. Each training and education curriculum is to be tailored to the specific needs of its audience. The HTYPE Demonstration Grant Program will fund LEAs to establish a cohesive strategy, with the support of a partnered nonprofit or nongovernmental organization (NGO), to build the capacity to provide all aspects of human trafficking prevention education to students and school staff.

Grantees are expected to conduct ongoing evaluations of the HTYPE Demonstration Grant Program, administering pre/post-tests to every student, educator, and other staff member who participates in the curriculum. All pre-tests for students, educators and other staff must be administered prior to, or within, one day of the start of training. All post-tests must be administered within one week after the completion of all training modules. Results from these evaluations will be reported to OTIP as program performance data (HTYPE Demonstration Grant Program Performance Indicators; OMB #: 0970-0490).

OTIP will use the information provided through these surveys to assess the extent to which grantees meet required program activities to: 1) Provide human trafficking education that equips educators and other staff to identify and respond to signs that students are at high risk of or are currently experiencing human trafficking; 2) Deliver student human trafficking prevention education that is designed to build student resilience to labor trafficking and sex trafficking by strengthening student knowledge and skills; 3) Train qualified individuals to implement and replicate project activities throughout the school district or identified target area(s), and; 4) Establish and implement a Human Trafficking School Safety Protocol (HTSSP). The information collected will also be used to inform a multi-site process evaluation of the HTYPE Demonstration Grant Program, to be conducted by the Office of Planning, Research, and Evaluation (OPRE) that will:

- Investigate and document how grantees approach and accomplish the goals of the HTYPE Demonstration Program;
- Inform ACF's efforts to support human trafficking prevention education in schools; and
- Inform future evaluation.

Consistent with ACF's goals and evaluation policy,[1] information from the evaluation will assist federal, state, and community policymakers, funders, and practitioners to make decisions about future school-based prevention approaches to address human trafficking, as well as inform the refinement of future evaluation strategies. A full information collection request related to this evaluation will be submitted by OPRE.

Universe of Data Collection Efforts

[1] The ACF evaluation policy was published in the Federal Register on August 29, 2014: 79 FR 51574 (Aug. 29, 2014).

HTYPE performance indicator data will be collected by HTYPE grantees through four different surveys, depending on the type of HTYPE curriculum participant and the age of the participant.

- HTYPE for Educators and Other Staff Pre- and Post-Implementation Survey (*Instrument 1*)
- HTYPE for Students Pre- and Post-Implementation Survey (*Instrument 2*)
- HTYPE for Elementary Students Pre- and Post-Implementation Survey (*Instrument 3*)
- HTYPE Training of Trainers (ToT) Post-Implementation Survey (*Instrument 4*)

Grantees are afforded the discretion to determine how surveys will be disseminated to program participants and how responses will be collected. Once responses are collected, grantees will use an Excel-based template (data collection approved under OMB #: 0970-0490) to submit aggregate survey data to OTIP on a quarterly basis.

A3. Improved Information Technology to Reduce Burden

To the extent possible, OTIP is committed to reducing the burden on respondents. As noted previously, grantees will determine how best to disseminate surveys and collect responses for their programs. Grantees will submit aggregate survey data as performance indicator information to OTIP through GrantSolutions via a user-friendly, Excel-based template prepared by OTIP for grantees.

A4. Efforts to Identify Duplication

Similar data is not gathered or maintained by OTIP, or available from other sources known to OTIP.

A5. Involvement of Small Organizations

LEA grantees that are considered small businesses or other small entities may be involved in these efforts, but OTIP will minimize the burden for these grantees by affording them the same discretion as all other grantees to determine how surveys will be disseminated and how the responses will be collected. OTIP will provide these LEAs with the same user-friendly, Excel-based template for submitting performance indicator data.

A6. Consequences of Less Frequent Data Collection

Each survey is administered twice—once as a pre-survey and once as a post-survey—to measure whether the expected changes or learning outcomes were achieved through the implementation of the HTYPE curriculum. Without this program performance data, OTIP will not be equipped

with the information needed to monitor grantee performance, identify issues for resolution, respond to training and technical assistance needs, or make programmatic improvements.

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 October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received.

Consultation with Experts Outside of the Study

OTIP consulted with subject matter experts at RTI to develop the surveys. During this development process, the surveys were streamlined to include age-appropriate language for program participants and to focus solely on the information necessary for grantees to collect in order to be responsive to generic performance progress report indicators. These efforts were made to reduce the time burden on both grantees and program participant respondents.

A9. Incentives for Respondents

No incentives for respondents are proposed for this information collection.

A10. Privacy of Respondents

No personally identifiable information (PII) will be collected. Grantees are required to protect the privacy and confidentiality of student and staff information, complying with all applicable Department of Education statutes and regulations (e.g., the Protection of Pupil Rights Amendment), especially PII, at all times and take the necessary measures to securely store student and staff records and to encrypt and/or password protect the electronic transmission of student and staff information to referral agencies and other organizations. All quantitative findings will be reported to OTIP in aggregate form.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Total Burden Requested Under this Information Collection

Burden estimates were calculated in consultation with subject matter experts at RTI to account for the amount of time necessary to administer the surveys, provide instruction to potential respondents and answer any questions, and to collect responses. The estimated burden includes the time to complete both the pre- and the post-surveys:

- HTYPE for Educators and Other Staff Pre- and Post-Implementation Survey (*Instrument 1*): 6 minutes to complete the pre-survey and 6 minutes to complete the post-survey for a total of 12 minutes.
- HTYPE for Students Pre- and Post-Implementation Survey (*Instrument 2*): 6 minutes to complete the pre-survey and 9 minutes to complete the post-survey for a total of 15 minutes.
- HTYPE for Elementary Students Pre- and Post-Implementation Survey (*Instrument 3*): 6 minutes to complete the pre-survey and 9 minutes to complete the post-survey for a total of 15 minutes.
- HTYPE Training of Trainers (ToT) Post-Implementation Survey (*Instrument 4*): 5 minutes to complete the post-survey

Instrument	Total Number of Respondents Contributing for 8 Grantees	Annual Number of Respondents[2]	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
HTYPE for Educators and Other Staff Pre- and Post-Implementation Survey *(Instrument 1)*	16,060	4,015	1	.20	803	$52.28	$41,980.84
HTYPE for Students Pre- and Post-Implementation Survey *(Instruments 2, 3)*	29,462	7,365	1	.25	1,841.25	N/A	N/A
HTYPE Training of Trainers (ToT) Post-Implementation Survey *(Instrument 4)*	638	159	1	.0835	13.28	$52.28	$694.28
Estimated Annual Burden Total					**2,657.53**		**$42,675.12**

[2] Annualized over the three year period of the umbrella generic

Total Annual Cost

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Educational Instruction and Library Occupations, Elementary and Secondary Schools Industry [25-0000] and wage data from May 2019, which provides an hourly mean wage of $26.14 per hour. To account for fringe benefits and overhead, we multiplied the wage by 2, which is $52.28. The estimated annual cost to respondents for an estimated total burden of *816.28 hours is $52.28 times 816.28 hours or $42,675.12. https://www.bls.gov/oes/current/oes250000.htm.

*Children are not expected to work or to have an associated wage rate, so there is no annual cost calculated for minor respondents.

A13. Cost Burden to Respondents or Record Keepers

There is no other cost burden to respondents or record keepers.

A14. Estimate of Cost to the Federal Government

The estimated annual cost to the federal government is $5,366.40

Grant performance progress reports are reviewed by salaried staff who assess program performance as a regular part of their work. ACF anticipates that the review of the information reported by the grantee(s) will cost $46.00 per hour (job code 15-2041) and wage data from May 2019 and take 80 hours annually costing $3,680.00 annually. This includes the time it takes for the data to be cleaned, organized, interpreted, and summarized into usable information. An additional 40 hours will be spent annually by the grant officer to review and discuss the submissions with the grantee at $42.16 per hour (job code 19-3099) and wage data from May 2019 for an annual total of $1,686.40.

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

Grantees are expected to conduct ongoing evaluations of the HTYPE program, administering pre/post-tests to every student, educator, and other staff member who participates in the curriculum. All pre-tests for students, educators and other staff must be administered prior to, or within, one day of the start of training. All post-tests must be administered within one week after the completion of all training modules. Grantees will submit aggregate survey data as performance indicator information to OTIP through GrantSolutions via a user-friendly, Excel-based template prepared by OTIP for grantees on a quarterly basis.

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

No exceptions are necessary for this information collection.