

## THE SUPPORTING STATEMENT

### Specific Instructions

Please do not remove or alter the headings below

#### A. Justification

##### 1. Circumstances Making the Collection of Information Necessary

OMB approval is requested for a new grant application guidance document designed to collect information from public or private agencies or organizations engaged in demonstrations, research, training, or other projects that receive funding from the Community-Based Abstinence Education (CBAE) discretionary grant programs. The CBAE program is authorized by Section 1110 of the Title XI of the Social Security Act [42 USC 1310 Act] (using definitions contained in the Title V, Section 510 (b) (2) of the Act) (Exhibit 1) and is administered by the Family and Youth Services Bureau (FYSB), Abstinence Education Division.

The CBAE program supports public and private entities developing and implementing abstinence education programs for adolescents, ages 12 through 18, in communities across the country. Projects funded by the program must promote abstinence education as defined by Section 510 of the Title V of the Social Security Act.

The U.S. Department of Health and Human Services provides funds for community-based , abstinence educational interventions designed to reduce the proportion of adolescents who have engaged in premarital sexual activity, including but not limited to sexual intercourse, the incidence of out-of-wedlock pregnancies among adolescents, and the incidence of sexually transmitted diseases among adolescents.

The program guidance includes requirements for grantees to maintain an unduplicated count of clients served, report the number of hours of service received by youth, provide program completion data, and list the communities served. It also requires grantees to provide information that can be used to evaluate outcomes for program participants. The data is intended to assess program performance and may be used to evaluate program effectiveness.

##### 2. Purpose and Use of the Information Collection

Data analysis will inform the monitoring of grantees for program design, program evaluation, management improvement, service quality and compliance with agreed upon goals. FYSB will need this information to assure effective service delivery and program management and to guide the development of national monitoring and technical assistance systems.

Finally, data from this collection will be used for reporting outcomes and efficiencies. It will provide valuable information for policymakers and key stakeholders in the development of programs and research efforts.

##### 3. Use of Improved Information Technology and Burden Reduction

The collection of this data will utilize electronic submission and other forms of information technology to reduce the burden.

#### 4. Efforts to Identify Duplication and Use of Similar Information

There is similar information, but it does not meet the current needs of the proposed study. The Youth Risk Behavior Surveillance System (YRBSS) implemented by the Centers for Disease Control and Prevention conducts a national survey which includes monitoring sexual behaviors that contribute to unintended pregnancy and sexually transmitted diseases among youth. While the information collected through the YRBSS includes items similar to those in the core measure survey which will also look at sexual behaviors among youth, the YRBSS monitors national rates and is not program specific. The core measure surveys are program specific and will identify rates specific to the youth served by FYSB Abstinence Education programs.

#### 5. Impact on Small Businesses or Other Small Entities

The information being collected has been held at the absolute minimum for the intended use.

#### 6. Consequences of Collecting the Information Less Frequently

FYSB will be unable to exercise oversight and stewardship if collection is not conducted. If the data is not collected, the program office will be unable to determine program impacts. Further there would be no means of measuring performance outcomes or reporting on program effectiveness. Additionally, the ability to identify technical assistance needs and make quality program improvements would be significantly compromised.

#### 7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

None are applicable.

#### 8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

On June 5, 2009, we initiated the regular clearance process with a 60 day notice in the Federal Register, page 27038, Vol. 74, No. 107.

On June 5, 2009, the Abstinence Education Division of the Family and Youth Services Bureau (FYSB), Administration for Children and Families (ACF), published a “notice for comments” in the federal register requesting comments from the public for a collection of questions proposed for the core measure. This measure was developed by the Abstinence Education Division along with a panel of abstinence education and evaluation experts. The panel members included: Anne Badgley, CEO, Heritage Community Services; Margaret Barajas-Brewer, CEO, Pennsylvania Associate of Latino Organizations; LeAnna Benn, National Director, Teen-Aid, Inc.; Terry Buckley, Program Manager; Scott and White Worth the Wait; Vijaya ChannahSorah, Independent Consultant; Results Management International; Arthur H. Coleman, Senior Vice President, The Medical Institute for Sexual Health; Valerie Huber, Title V Coordinator, Department of Health State of Ohio; Elizabeth Mackey,

Director, Project Reality; John Margand, Executive Director, Program Reach, Inc.; Sharon McGroder, Senior Scientist, The Lewin Group; Scott Phelps, Executive Director, Abstinence and Marriage Partnership; Harry Piotrowski, Director, Research and Evaluation; Lisa Rue, Professor, University of Northern Colorado; Thomas Edward Smith, Professor, Florida State University; Stan Weed, Director, Institute for Research and Evaluation. The core measure was designed specifically to assess key outcomes, such as initiation and discontinuation of sexual intercourse, as well as two key predictors of initiation: sexual values and behavioral intentions of youth program participants. Community Based Abstinence Education (CBAE) grantees will be required to ask the proposed questions to each program participant in a pre, post and follow up survey.

Responding to the notice for comments, many CBAE grantees and evaluators shared their suggestions and concerns for the proposed measure. In particular, many respondents shared a concern related to the questions which focus on measuring rates of sexual intercourse among participants (questions one through three). Some respondents identified these questions as “intrusive” and believed that by being required to ask youth such personal questions, their programs would be at risk for: increased levels of distrust among parents and school officials; declining levels of participation due to additional parental permission that many school systems would require; youth being served a mixed-message that hailed abstaining, yet still assumed a degree of sexual involvement; and in the worst case, complete discontinuation of certain programs. Further, some expressed unease with asking such explicit questions to youth who may be as young as twelve years old. In this particular case, some respondents believed that the questions would be harmful to the youth being served and suggested alternative questions to ask youth on the surveys. Suggested alternatives provided by respondents were: modifying the questions to reflect positively on abstinence education and skills learned; deletion of certain questions which are redundant; changing words in the questions and answers to be more age appropriate and objective; switch answer choices to reflect a descending order of positive to negative answers; and replacement or addition of some questions to reflect more of the individual programs work. One respondent stated that the burden hours appear accurate.

The Abstinence Education Division truly appreciates those grantees and evaluators who took the time to share their thoughts through this process. While not all suggestions were implemented, the Abstinence Education Division is committed to giving consideration to the comments which will most benefit and strengthen the overall CBAE program. As a result of comments received changes have been made to reflect some concerns: one question was deleted because of redundancy; and some questions answer choices were switched around.

#### 9. Explanation of Any Payment or Gift to Respondents

There is no remuneration of any kind for respondents.

#### 10. Assurance of Confidentiality Provided to Respondents

Individual case information will be provided to FYSB; however, identifying information for respondents will not. Protection of privacy and individual case files is the responsibility of the grantee, but FYSB may examine grantee diligence in this regard through onsite monitoring or other means. Also guidance will be provided to grantees on the collection of private identifiable information in accordance with HHS regulations and requirements set forth for the protection of human subjects at 45 CFR part 46.

#### 11. Justification for Sensitive Questions

This measure, developed by the Abstinence Education Division along with a panel of abstinence education and evaluation experts, was designed to specifically assess key outcomes, such as initiation and discontinuation of sexual intercourse, as well as two key predictors of initiation: sexual values and behavioral intentions. FYSB will be unable to exercise oversight and stewardship if collection is not conducted. If the data is not collected, the program office will be unable to determine program impacts. Further there would be no means of measuring performance outcomes or reporting on program effectiveness. Additionally, the ability to identify technical assistance needs and make quality program improvements would be significantly compromised. Guidance will be provided to grantees about the policies of the Office of Human Research Protections (OHRP) which requires assurance of human subject’s protections. HHS regulations regarding the OHRP ensure compliance with the requirements set forth in the regulations for the protection of human subjects at 45 CFR part 46.

#### 12. Estimates of Annualized Burden Hours and Costs

<b>Instrument</b>	<b>Average burden hours per response</b>	<b>Number of respondents</b>	<b>Number of responses per respondent</b>	<b>Total burden hours</b>
Program specific performance measure (pre-test survey)	.25	1,000,000	1	250,000

Estimated total annual burden hours: 250,000

<b>Instrument</b>	<b>Average burden hours per response</b>	<b>Number of respondents</b>	<b>Number of responses per respondent</b>	<b>Total burden hours</b>
Program specific performance	.25	1,000,000	1	250,000

measure (post-test survey)				
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Estimated total annual burden hours: 250,000

<b>Instrument</b>	<b>Average burden hours per response</b>	<b>Number of respondents</b>	<b>Number of responses per respondent</b>	<b>Total burden hours</b>
Program specific performance measure (follow-up test survey)	.25	500,000	1	125,000

Estimated total annual burden hours: 125,000

### 13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

The current OMB inventory of annualized cost burden to respondent indicates that there are no capital or startup costs associated with this data collection. FYSB staff does not anticipate any changes in cost burden to respondents.

### 14. Annualized Cost to the Federal Government

The annualized cost to the Federal Government for this information collection is estimated to be \$220,000. The estimated costs includes a service level agreement with ACF’s Office of Information Systems (OIS) to design the forms for information collection, editing, security, pilot tests, marketing, materials, analyses, custom reports and contract support staff through the On-line Data Collection (OLDC) system. This cost includes the collection of output data in the OLDC system. The OIS service level agreement will be modified to include information collection on outcome data once clearance is received for core measure surveys. There are no additional funds needed for operational costs related to receiving, reviewing, accepting, or monitoring of grantee’s semi-annual and annual reports. On this basis, the estimated average annual cost to the Federal Government is \$220,000.

### 15. Explanation for Program Changes or Adjustments

The original request for clearance only included the number of anticipated applications in response to the program announcement for CBAE funding and the anticipated hours spent per application. The program has now changed this request to reflect the number of respondents who will complete the survey administered by awarded CBAE grantees and the anticipated time it will take each respondent to complete each survey.

### 16. Plans for Tabulation and Publication and Project Time Schedule

Aggregation of data from semi-annual reports will begin each year in May after receipt of reports which are due by April 30. Aggregation of data from annual reports will begin in November after receipt of reports which are due by October 30. FYSB will work with the Office of Information Systems (OIS) to complete key activities of aggregating data and providing customized reports which incorporate analyses of the data received from grantees. This information will be collected and analyzed through OIS's On-line Data Collection System (OLDC). It is estimated that data analysis and verification will take two to three months to complete, allowing for ample contact with grantee personnel to verify data, make any corrections, or resolve any issues or questions. Reports of the analyses should be complete four months after receipt of information from grantees semi-annually and annually. The information will not be published for statistical use.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The OMB expiration date will be displayed in the upper right hand corner of the instrument.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification statement identified in item 19 of the OMB 83-I; this project meets all requirements of 5 CFR 1320.9. This information collection does not employ statistical methods as indicated in OMB 83-I item 17.

**B. Statistical Methods (used for collection of information employing statistical methods)**

FYSB will not employ statistical methods for the information collection instruments. The collection instruments were designed to be program specific. The universe of respondents of the collection instruments are youth who participate in CBAE programs. It is expected that all youth who participate in CBAE programs will be surveyed.

1. Respondent Universe and Sampling Methods
2. Procedures for the Collection of Information
3. Methods to Maximize Response Rates and Deal with Nonresponse
4. Test of Procedures or Methods to be Undertaken
5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data