

## Final SRAE PAS Performance Measures 12/15/2022 Questions and Answers

### Guidance for Obtaining Partnership Buy-In and Approval for Surveys

- *Q: What critical discussion and agreements should be in place prior to approving partners and implementation sites?*

A: Grantees should first share the performance measures surveys with their subrecipients and persons with the decision making authority to survey program participants at implementation sites. As stated in the Notice of Funding Opportunity (NOFO), the Family and Youth Services Bureau (FYSB) grantees and subrecipients are required to collect and report on all OMB-approved SRAE performance measures as a condition of receiving grant funding. The purpose of federal performance measures is for the federal agency to effectively monitor and report on program implementation and progress. We encourage grantees to share this information with their partners to help explain the purpose of performance measures and how they will be used.

Local implementation sites may have policies and practices related to data collection or sensitive questions already in place. FYSB strongly recommends meeting with stakeholders and researching the data collection policy and procedures of school boards and planned implementation sites to gather more information about data collection practices.

- *Q: Do you have any script or talking points that grantees can use to start conversations about coordinating the approval process for the performance measures surveys?*

A: Yes. FYSB has developed a set of questions to assist grantees in discussions with stakeholders. These questions are recommended and are not required. On the Webinars section of the SRAE PAS website you will find the questions as part of this handout (Questions to Guide Discussions with Partners: SRAE Participant Entry and Exit Survey Data Collection Policies, Practices, and Processes) under the October 3, 2022, Sexual Risk Avoidance Education (SRAE) Guidance for Obtaining Partnership Buy-In and Approval for Performance Measures webinar.

- *Q: What should grantees do if they believe schools or other partner organizations might refuse to allow data collection for one or more survey items?*

A: Grantees should share the performance measures with schools or other partners and discuss the benefits of the performance measures data for the community. If the schools or other partners then refuse to allow collection of one or more survey items, grantees should discuss the issue with their Federal Project Officer (FPO).

- *Q: Are grantees allowed to reformat the surveys to add additional items specific to their projects?*

A: Grantees may choose to add other items to the entry or exit surveys only under the following

conditions. All OMB-approved items must be administered first, in the order presented in the ACF-approved survey before any additional items are presented. Grantees should not submit the additional measures to ACF; only the OMB-approved performance measures should be submitted. If grantees intend to add additional measures to the end of the OMB-approved survey, they are required to insert the following phrase between the last federal performance measure item and the first item of any additional measures: *The questions above are part of a national effort to measure whether programs meet their goals. It is sponsored by the U.S. Department of Health and Human Services. The next questions are not part of this national effort.*

OMB requires that grantees do not change the survey item wording, order, the response categories, or skip logic. Grantees and subrecipients must use the entry and exit surveys in their entirety unless the grantee obtains a waiver from their FPO for a particular item(s). The instructions must also be presented in their entirety unless grantees need to make formatting and instruction changes due to online data collection. Examples of such changes include: (1) No longer instructing respondents to use a pen or pencil, (2) Limiting the number of survey items that can be viewed at one time, particularly if youth will view the survey on their smartphones, and (3) Formatting survey items and responses presented in a grid to avoid scrolling across the screen.

If grantees need a Word version of the surveys for this re-formatting, or for any other formatting, such as online survey programming, they should request that from their FPO. If the FPO approves, then the grantee will receive a Word version, and grantees can move forward with adding additional items at the end.

- *Q: Should grantees use the same surveys across all of their subrecipients and implementation sites?*  
A: Yes. The primary goals when obtaining approval for the performance measures surveys is to agree on one set of surveys that the majority of your partners and sites can use.
- *Q: What if a grantee does not have performance measures data collection costs in their current budget?*  
A: As stated in the funding opportunity announcement, the collection of federal performance measures is a requirement for all grantees. Please work with your Federal Project Officer to revise your budget, as needed.

## **IRB**

- *Q: Since survey instruments are OMB approved, are grantees still required to obtain IRB approval?*  
A: OMB and IRB requirements and purposes are distinct. The purpose of the federal OMB process is to review and approve federal data collection and to minimize data collection burden on the public. The purpose of the IRB process is to review and approve research at the local level that involves human subjects to ensure data are collected ethically and to minimize any potential harm. The Family and Youth Services Bureau (FYSB) requires that grantees seek a Letter of Determination from

their local IRB to determine whether the performance measures need to be reviewed, and, if so, what type of review will be needed. A full or expedited review by an IRB may be necessary to approve data collection with SRAE program participants. IRB institutions can be found within state human or health services offices, at local universities, local school systems, and in the private sector. An IRB that covers federal data collection efforts does not exist.

- *Q: How can grantees find an IRB?*

A: Grantees should identify whether their organization has an existing relationship with an IRB. Many organizations have internal or affiliated IRBs, so grantees should check within their organizations first. IRBs often operate within public or private nonprofit entities, such as universities, state agencies, or hospitals. If there is no existing relationship with an IRB, grantees should check with partner organizations, such as local universities, hospitals, and research institutions to learn whether they have an existing relationship with or can recommend an IRB. If needed, grantees can also work with external or commercial IRBs. Federal HHS regulations require all IRBs to register with HHS if they will review research that involves participants and will be conducted or supported by HHS. If the IRB a grantee works with determines that performance measures data collection must be reviewed/approved, the IRB must be registered with the HHS Office of Human Research Protections (OHRP) database. A national list of registered IRBs is available through the HHS OHRP database: <http://ohrp.cit.nih.gov/search>. Grantees can search this database to learn whether the IRB they have in mind is registered.

- *Q: What if grantees do not have IRB approval before the data collection period for the participant entry and exit surveys starts?*

A: As a reminder, the next data collection start date for all grantees for SRAE participant entry and exit surveys begins January 1, 2023. If an IRB review is required, IRB approval must be obtained **before** administering the surveys to youth. FYSB encourages grantees to seek an IRB committee that will enable them to obtain approval prior to data collection, if approval is needed. If grantees foresee that IRB approval will take longer, they should share the reason and the estimated date of obtaining approval with their Federal Project Officer.

Grantees should continue providing programming to youth while awaiting IRB approval for survey data collection. They should also continue to collect measures of structure, cost, and support and attendance, reach, and dosage.

- *Q: Are grantees allowed to provide any incentives to participants to encourage response?*

A: Yes, they are allowed to provide incentives, assuming that the grantee's budget allows for it and the grantee has discussed it with their FPO. However, there are limitations. Grantees should discuss with their FPO the cost, amount, and manner in which incentives are delivered.

- *Q: What should grantees do if their IRB does not approve performance measures data collection or specific survey items?*

A: Grantees should review the IRB’s written summary of concerns to learn why performance measures data collection or collection of specific survey items have not been approved. A rejection from the IRB may indicate that informed consent, data collection, and/or data privacy and security procedures need to be strengthened. If grantees need assistance strengthening these procedures, they can view materials on the [www.sraepas.com](http://www.sraepas.com) website, contact the SRAE Performance Measures Help Desk, and/or share IRB concerns with their FPO. Situations will be addressed on a case-by-case basis to determine how best to proceed.

- *Q: What if the grantee’s IRB, school, or other partner organization requires active parent/guardian consent or parental/guardian notification to administer the entry and exit surveys?*

A: Grantees must comply with all existing requirements to obtain parent/guardian consent or notify parents/guardians about survey data collection. A template for a parent/guardian consent form that can be adapted by grantees is included with the October 18<sup>th</sup>, 2022, webinar materials at [www.sraepas.com/webinars/](http://www.sraepas.com/webinars/). If parent/guardian consent is required, grantees should only administer surveys to youth whose parents/guardians provide consent. Youth who do not receive parental consent to complete the surveys can still receive SRAE programming.

### **Online Data Collection**

- *Q: Will you be adapting the surveys to be completed online?*

A: No, the team has not formatted the surveys for online completion. Please refer to the webinar on online data collection – available at [www.sraepas.com](http://www.sraepas.com).

- *Q: What is the first step that grantees should take if they want to use online data collection for the entry and exit surveys?*

A: The first step that grantees should take is to communicate with their Federal Project Officer to share their plans for online data collection. When grantees create their plan and schedule to discuss with their Federal Project Officer, it will be important to allow enough time for the steps related to initial programming and testing of online surveys. In addition, grantees may decide that they want to offer alternative methods of data collection for any youth who do not have online access.

- *Q: Who else should grantees talk with to make plans about online data collection?*

A: After talking with their Federal Project Officer, and before grantees begin making the change to online survey data collection, they should work with partners to determine whether online survey data collection is possible and desirable. Involving partners in this process can facilitate adoption of online survey data collection procedures. Communicating with partners provides an opportunity to gather useful information and tips as grantees begin making a change to online survey data collection. Partners may have helpful ideas about staffing and software capacity to conduct online data collection and what supports may be needed.

- *Q: How do grantees begin to adapt the entry and exit surveys for online survey programming?*

A: Grantees will need to request Word document copies of the surveys from their Federal Project Officer, as the surveys are only available in PDF versions. **Certain changes are not permitted** when adapting instruments for online survey data collection. Grantees must retain exact question wording, question order, and any existing skip patterns to match the original surveys.

- *Q: If a grantee previously received a letter of determination that paper-and-pencil survey administration of the participant entry and exit survey performance measures did not require IRB review, do they need to seek additional information from the IRB if they plan to switch to online data collection?*

A: Yes. FYSB recommends that all grantees who plan to switch to online data collection for SRAE participant entry and exit survey performance measures contact their IRB about this change. For this example, grantees should seek a new letter of determination from the IRB for online data collection.

*Q: If a grantee previously obtained parent consent for paper-and-pencil surveys, what are their options for obtaining consent for online surveys?*

A: Grantees who want to use online data collection for participant entry and exit survey performance measures should work with their IRBs and partners to determine how parents will be informed about online data collection. These grantees also should decide how youth assent will be obtained and refusals will be handled, since participant entry and exit survey performance measures are voluntary. Grantees should provide contact information for parents and youth to ask questions about online data collection.

If grantees previously sought parent consent for paper-and-pencil surveys, they need to determine whether to notify parents about the change to online data collection (using passive consent) or repeat the parent consent process. Parent consent may be obtained in written form, through a signed PDF via email, via telephone (with written document of their decision sent to parents), or through a signed e-consent via an online database.

- *Q: Can grantees choose to do both online, and when possible, in-person surveys? Or does the grantee need to choose just one mode of delivery?*

A: In practice, that can absolutely happen. It depends on your partners and your partners' needs, depending on how large your reach is. You may have some partners who can implement surveys in person and those who cannot. It will depend on your partner's needs. You can do both, but we recommend consulting with your evaluator and IT person to make sure that data are still transmitted in a way that can be uploaded to FYSB (Excel or csv).

Grantees can use any survey mode to conduct the participant entry and exit surveys, including virtual survey administration. General testing of any virtual mode should be done in advance of survey implementation with youth to ensure that respondents will be routed correctly through the survey and that required data privacy and security protocols are in place.

- *Q: What kind of referral protocol is needed if youth become distressed during online data collection?*  
A: If a youth appears to be distressed, grantees should follow the trauma-informed procedures established by their organization (for example, refer youth to a teacher or counselor or have a staff person available during virtual data collection). If a youth needs to leave the room because they are upset, an adult should accompany the youth and make a warm handoff to the appropriate adult as part of the organization’s trauma-informed protocol. A youth should not be left alone to find assistance. Staff will want to follow up with the youth within 8 hours if they need to log off from the survey due to distress.

## Survey Administration

- *Q: Is there a protocol to be used when administering entry and exit surveys?*  
A: There is not an existing protocol, a step-by-step that all grantees must follow. We do have Data Privacy and Security Requirements guidance and requirements to safeguard data (on the [www.sraepas.com](http://www.sraepas.com) website) and assure privacy for participants.
- *Q: Many of our target populations find the wording and formatting of the entry and exit surveys very confusing. They find it so difficult that they either randomly select answers or skip answers. According to the 10/18/2022 webinar, we are not allowed to simplify the wording and formatting. What do we do?*  
A: We certainly understand your concerns, and other grantees also share your concerns. FYSB believes that these issues can be addressed with more guidance around survey implementation. We will provide guidance that you can use when implementing the surveys with participants in the new year.
- *Q: What guidance should the staff administering the surveys provide to youth to encourage accurate responses?*  
A: Staff administering the surveys should:
  - Explain why the entry and exit surveys are important—that:
    - They help improve the programs
    - They give youth a chance to share their experiences
  - Reassure youth that no one outside of the study team will see their answers, the survey is brief, and they do not have to answer any questions they do not wish to

- Review the instructions at the beginning of the survey, including the example of how to answer questions
- Remind youth to move slowly and carefully through the survey and to:
  - Read the instructions for each question
  - Read every response option before answering
  - Pay special attention to grid questions, where response options are in the column headings. Note that these column headings can change from question to question. Remember that if none of the response categories apply to the respondent, it's okay to leave the question blank

## Surveys and Timelines

- *Q: When is the next data submission window?*

A: The Portal will next open in January 2023 and remain open through mid-February. During this winter's Portal window, continuing grantees (that is, grants awarded before fall 2022) should submit survey-based data and measures of attendance, reach, and dosage covering July 1, 2022 through December 31, 2022.

New grantees first funded in fall 2022 will not submit data this winter. They will first submit data during the summer 2023 submission window, in July/August 2023.

- *Q: When and how can I get an account to submit data to the Portal?*

A: For continuing grantees, all users who had Portal accounts in the past will be able to access the Portal through those accounts when it opens in January 2023. For new grantees, grant-level accounts will be created when the data summer 2023 submission window opens (in July), the main contacts for each new grant will receive an email with a temporary password and instructions to complete the account setup process. Grantee-level users can create additional accounts for others under their grant.

- *Q: How do the various versions of the revised entry and exit surveys differ?*

A: There are four versions of the revised entry and exit surveys:

- The version for high school and older youth is the longest,
- The version for middle school-age youth differs from the high school version in two ways: (1) the questions on age and grade have different response categories and (2) the middle school versions do not include sensitive questions related to sexual activity
- There are two versions for use by programs that are participating in impact studies—one for high school and older youth and one for middle school-age youth. Only the entry surveys are different for programs participating in impact studies – the exit surveys are the same as the main versions of the surveys. The entry survey is shorter than the main version of the survey. The entry survey for programs participating in impact studies includes questions about participant characteristics only.

- *Q: What is the OMB expiration date for the current entry and exit surveys?*  
A: FYSB recently received extended OMB approval for the SRAE PAS participant entry and exit surveys. The new OMB expiration date for the surveys is 12/31/2023. Grantees can update their participant entry and exit surveys to reflect the new expiration date (12/31/2023) and / or they can obtain surveys with updated expiration dates on the SRAE PAS website at [www.sraepas.com](http://www.sraepas.com).
  
- *Q: What should be done (particularly for State grantees) if some sites are delivering a pilot version of the program (shorter in duration/intended hours) for some cohorts, while also delivering the full fidelity program for other cohorts? How should this data be entered since the portal limits grantees to listing only one “intended program hours benchmark” for the sub-awardee and doesn't allow for differing intended hours?*  
A: If the number of hours is notably different between cohorts, then the hours can be entered by considering them as two different programs, even if the same core curriculum is used. For example, you might call one program “Teen Outreach Program (TOP) – full version” and the other “Teen Outreach Program (TOP) – pilot version” and then submit hours for both. If you have further questions please discuss with your federal project officer.