MATHEMATICA
Policy Research, Inc.

Supporting Justification for OMB Clearance of Data Collection Instruments for the Identifying Promising Temporary Assistance for Needy Families Diversion Practices Study

Revised

November 6, 2007

Linda Rosenberg

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I. JUSTIFICATION

A. CIRCUMSTANCES NECESSITATING DATA COLLECTION

Changes in welfare over the past ten years have led states to implement policies and programs that encourage welfare applicants to participate in work-related activities or find an alternative to welfare. The passage of the 1996 Personal Responsibility and Work Opportunities Reconciliation Act (PRWORA) changed the welfare system in the United States by replacing the Aid to Families with Dependent Children with the Temporary Assistance for Needy Families (TANF) program. PRWORA gave states increased flexibility in designing their welfare programs but also placed a limit of 60 months on recipients' lifetime receipt of federal welfare benefits and required an increasing percentage of the TANF caseload to be engaged in a work-related activity. By redefining the calculation of the caseload reduction credit that states can receive for reducing the number of families receiving cash assistance, the Deficit Reduction Act of 2005 (DRA) effectively increased the proportion of states' caseloads required to participate in work-related activities. This change has caused states to reevaluate their welfare programs and to identify new strategies for meeting the needs of poor families seeking cash assistance.

To increase work participation rates, decrease the welfare rolls, and preserve families' lifetime welfare limit, states have implemented programs designed to divert TANF applicants from the welfare program. The most common type of diversion program implemented in the wake of PRWORA was an offer of a lump-sum payment in lieu of TANF cash benefits to applicants meeting certain criteria, most often those who were work-ready or already employed. Typically, the lump sum is equivalent to several months of welfare receipt, and lump-sum recipients often face a period of ineligibility for TANF. As of 2005, approximately 30 states had a lump-sum program (The Urban Institute 2006).

Another common policy to discourage reliance on welfare is placing requirements on TANF applicants before they are certified for cash assistance. For example, about 18 states require all or certain types of applicants to participate in a job search activity before their TANF applications can be approved (The Urban Institute 2006). States have also implemented additional work-related application requirements to assist applicants in finding work, such as the development of an employability plan or attendance at a work-related orientation session. Through these activities, applicants understand the importance placed on work in the welfare program and may have the opportunity to find employment before their TANF application is approved. Another approach to diverting applicants from TANF is to require applicants to explore alternative community and other resources, ensuring that the TANF program is a program of last resort.

With the passage of the DRA, some states are creating applicant programs with the goal of engaging applicants in work activities before they begin receiving TANF while also providing short term financial assistance. Through these programs states expect to prepare applicants for the work participation requirements before they become eligible for TANF assistance. Since assistance is short term and is considered "non-assistance," applicants' time in these programs is not counted toward their lifetime TANF limit and these applicants are not included in the calculation of the state's work participation rates.

Other states are implementing or considering solely state-funded programs for families that are unlikely to meet the work participation requirements required for those families who receive cash assistance funded with federal TANF or state maintenance-of-effort funds. These state programs may have the benefit of providing targeted families with needed services that are not countable federal work activities and removing these families from the calculation of the state's

work participation rate. In some states, applicants for the TANF program may be referred to these state programs.

In September 2006, the U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF) contracted with Mathematica Policy Research, Inc., to document the types of diversion and upfront applicant strategies that states have implemented and their prevalence across the country. The project will provide valuable information on how state and local offices are using strategies to divert TANF applicants or engage them in work activities to meet the work participation requirements under DRA.

The Identifying Promising TANF Diversion Practices study will collect details on these programs, identify promising practices, and learn more about the types of data state and local offices maintain on their programs through the following activities:

- A mail survey of the 50 states and the District of Columbia to document the types of applicant programs and requirements in place

- Interviews with state and local administrators about their strategies regarding applicant diversion and employment-related programs

- Site visits to two local offices in each of three states to gather details on implementation

This Office of Management and Budget (OMB) submission requests approval to conduct these study components.

1. Mail Survey

To document the types of diversion and TANF applicant activities in place across the country, the study team will administer a mail questionnaire to the TANF directors in the 50 states and the District of Columbia (see Appendix A). This survey will enable the project team to provide ACF with an up-to-date count of the states that utilize each type of diversion and

applicant program. However, we will not request details of these activities through the survey. Through follow-up telephone interviews, the study team will acquire the specific information needed.

Upon OMB approval, we will mail out the short questionnaire to the TANF directors. We will follow up by telephone as necessary to ensure a 100 percent completion rate. Responses from the 51 questionnaires will be entered into an Excel spreadsheet.

2. State and Local Telephone Interviews

The research team will conduct a follow-up telephone interview with each of the state TANF directors and selected local TANF directors. Through the former, we will learn more about each state's approach to TANF diversion and applicant programs; through the latter, we will learn more about how implementation of diversion efforts occurs at the local level. The interviews have four objectives:

1. **Clarify Key Aspects of Applicant Diversion and Employment Strategies.** The interviews will explore the nature of practices by gathering information on the details of key dimensions and by determining whether, how, and why these policies may have changed over the course of the state's implementation of the TANF program and since passage of DRA.

2. **Ascertain the Degree of Standardization or Variation in Practices Within a State.** The interviews will seek to understand the extent of discretion granted to local TANF administrators and how widely diversion policies and practices vary across a state.

3. **Gather Detailed Information on Implementation of Policies.** The interview will explore the typical client flow for a particular program or requirement in order to understand how a client experiences the program, what staff is involved in determining eligibility and delivering services, and whether lessons may be learned from state and local implementation experiences.

4. **Determine the Availability and Accessibility of Data on Applicant Diversion and Employability Programs.** The interview will investigate whether states and/or localities collect data on client participation and outcomes, what specific data elements are tracked, how the data are collected, whether the data are accessible for analysis, and whether any analysis or reports are available.

Depending on a state's diversion strategies, the state-level interview will take from 10 to 60 minutes. Based on preliminary information on the implementation of these policies across states, we anticipate that 16 of the interviews will be approximately 20 minutes each, while 35 will average 60 minutes each. Since the local interviews will be targeted to local offices with applicant requirements and/or programs, we estimate that these interviews will last about 60 minutes.

To accommodate the different diversion strategies the state and local offices have implemented, the interview guide consists of several modules (see Appendix B). Each module contains a set of interview questions for the particular type of diversion strategy employed. Thus we will be able to tailor each interview to the types of applicant diversion and employment strategies implemented in the state or local office.

We will schedule each state's telephone interview after we have received its completed state mail questionnaire so that we can tailor the interview appropriately. Based on information we obtain from the state-level telephone interviews on the extent of variation in diversion practices and the types of activities being implemented across their local offices, we will purposively select approximately 30 local offices (3 from each of 10 states) for interviews. We will select local offices in states that have a diverse range of diversion practices or that offer local office discretion in selecting and implementing diversion strategies.

3. Site Visits

Site visits will offer an opportunity for deeper exploration of the implementation details of diversion programs and the identification of promising practices. We will interview key staff at the local level in three states with innovative applicant diversion and employment programs. Key topics we plan to cover during site visits include the following:

- ***Development of Innovative Practices.*** We will ask local administrators about their motivation for adopting a particular practice and the timeline for implementation. We will also investigate how the policies and procedures were developed and changed over time.

- ***Implementation and Service Delivery.*** Our interviews will explore in detail the process for implementing and delivering the applicant strategy, including the types of staff members involved, the training provided to staff, and typical experiences among clients.

- ***Major Challenges and Lessons Learned.*** To provide a full understanding of promising practices, we will gather information on program administrators' impressions of the challenges and successes encountered in implementing the practices. We will ask administrators to suggest lessons for other states or localities that may consider adopting similar practices.

- ***Program Administrative Data.*** We will make every effort to obtain readily accessible data files, system reports, or analyses that can help answer questions about the level of program participation and the characteristics and outcomes of TANF applicants.

We plan to conduct site visits to three states, visiting two localities in a single state when possible. Our criteria for selecting local sites will be whether they currently employ an applicant diversion or employment approach that is likely to be of interest to other states and localities and that appears to be achieving its intended goals. The program should have the potential to serve as a promising practice for possible replication and should have been operating long enough to have resolved initial implementation issues. We also will aim to include a mix of approaches among the local sites visited. We will develop a list of possible locations for site visits by using data collected from the state and local telephone interviews, and information gathered from a research review and from interviews with representatives of national organizations and noted welfare researchers. In addition, we will use the pretests of the survey instrument as an opportunity to learn more about states and localities that appear to be particularly strong candidates for site visits. Based on these criteria, we expect that states selected for site visits will have work-related application requirements and/or a pre-TANF job search program.

The site visits will include semi-structured interviews with a variety of agency staff members, including directors, mid-level managers responsible for implementing diversion practices, and line staff who screen applicants for participation in applicant diversion or employment programs and/or deliver services to applicants. Site visitors will tailor the site visit interview guide for each interview to ensure the questions reflect the experience and responsibilities of the person being interviewed (see Appendix C). If partner organizations are involved in the practice, we will seek to interview representatives of those organizations as well. Finally, we will observe the delivery of services related to applicant diversion and employment efforts—such as individual intake (or screening) meetings, group orientations, or required group job search sessions or workshops—in order to gain as much insight as possible into how the diversion approach functions in practice and is experienced by potential TANF applicants.

Two project team members, the project director and a research analyst, will jointly conduct each of the visits to the two local offices within the three selected states. In a typical day, site visitors will aim to conduct a total of four to five interviews plus observations of program activities. In general, both staff members will be present at any given interview. The two-person approach increases the effectiveness of the probing during the interview and allows visitors to compare notes and impressions following the interviews to ensure that all information is captured accurately. At the same time, a pair of staff members on site allows flexibility in the site visit schedule, should it be necessary.

4. Possible Study Limitation

The study's main limitation is that it will not evaluate the effectiveness of state and local offices' applicant diversion and employment programs. While the study will be able to identify and describe innovative and potentially promising practices, it will not determine which approaches are most effective at diverting applicants or preparing them for TANF's work-related

requirements. In addition, although the study will attempt to collect administrative data on these programs, it will not be able to report the outcomes for participants of these programs.

B. HOW, BY WHOM, AND FOR WHAT PURPOSE INFORMATION IS TO BE USED

This study will inform ACF and states of the types of applicant diversion and employability programs in place across the country. Specifically, the study aims to describe states and local offices' approaches to and experiences with diverting applicants from TANF or requiring their participation in work-related activities. This information may inform these offices' decisions about policies and implementation guidelines for their own applicant programs.

C. USE OF AUTOMATED, ELECTRONIC, MECHANICAL, AND OTHER TECHNOLOGICAL COLLECTION TECHNIQUES

This study will use limited technological techniques to collect information from states. The initial survey will be mailed (or emailed) to state respondents and the study team will follow up with telephone interviews. No other techniques are necessary given the size of the initial mailing (50 states plus the District of Columbia) and the nature of the telephone followup (semi-structured interviews).

D. EFFORTS TO AVOID DUPLICATION OF EFFORT

This study will enhance existing efforts to document state and local offices' use of TANF applicant diversion and employment strategies. Through the Welfare Rules Database (WRD), the Urban Institute has documented state rules with regard to particular TANF policies. While the database contains information on states' TANF diversion strategies and applicant job search requirements, it does not describe states' overall approach to diverting applicants and engaging them in work activities. Additionally, the WRD does not capture all types of diversion activities such as applicant job search programs that provide short-term cash assistance or requirements

that applicants complete an employability plan or attend a work-related orientation. This study will cover a broader range of diversion strategies and provide more analysis of the states' goals for their programs, whether the strategies are meeting intended goals, and other approaches they are considering in the wake of DRA.

To avoid duplicating the work of the Urban Institute, wherever possible, we will use the data it has collected on these programs so that we do not ask states or localities for information already collected. For example, in interviewing an administrator in a state with a known lump-sum payment program, we will summarize the information in the WRD database and ask the respondent to confirm the information, rather than asking the respondent to relate all the policy details.

E. SENSITIVITY TO BURDEN OF SMALL ENTITIES

The information requested is the minimum required to meet the study objectives. The burden on state and local offices has been minimized as much as possible by designing an approach to data collection that intrudes only minimally. First, state TANF directors will be asked to complete a short, non-labor intensive questionnaire to help frame the rest of the study. Then, based on the results, we will tailor subsequent telephone interviews to ask each state director only those questions that are appropriate for his or her state context. We will schedule the telephone interviews for a time most convenient for the respondent.

Before each round of site visits, the research team member who will be leading the visit will contact the local TANF director to explain the purpose of and review possible dates for the visit. We will offer directors alternative dates and allow them to select the dates most convenient for program staff. Following this initial contact, we will send the director a letter that details what we hope to accomplish during the visit, who we need to interview, the approximate amount of time needed for each interview, and the amount of time needed for the discussions.

F. CONSEQUENCES TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY THAN PROPOSED

The data collected in this study will provide important information to understand how states use TANF diversion and applicant strategies, especially in response to the new requirements contained in the DRA. If these data were not collected, ACF would not have a comprehensive understanding of states' strategies to divert TANF applicants from public assistance or to prepare them for the TANF work-participation requirements.

G. SPECIAL CIRCUMSTANCES

There are no special circumstances.

H. FEDERAL REGISTER ANNOUNCEMENT AND CONSULTATION

1. Federal Register Announcement

The initial *Federal Register* announcement was printed on November 16, 2006 in Volume 71, No. 221, p. 66786. The second notice was printed on February 13, 2007 in Volume 72, No. 29, pp. 6736-6737. For additional information, see the Office of the Secretary Certification Statement.

2. Consultation

A number of individuals beyond the study team have been consulted on the design of the study and the development of the data collection instruments. Their names, organizational affiliations, and telephone numbers are listed below:

- Naomi Goldstein, ACF (202-401-9220)
- Karl Koerper, ACF (202-401-4535)
- Michael Dubinsky, ACF (202-401-3442)
- Peter Germanis, ACF (202-401-6495)

- Gretchen Kirby, MPR (202-484-3470)
- Liz Schott, Center on Budget and Policy Priorities (202-408-1080)

I. PAYMENTS OF GIFTS TO RESPONDENTS

No payments will be made to respondents for their participation in this study.

J. CONFIDENTIALITY OF THE DATA

This study is being conducted in accordance with all relevant regulations and requirements, including the Privacy Act of 1974 (5USC 552a), the Privacy Act Regulations (34 CFR Part 5b), and the Freedom of Information Act (5 CFR 552) and related regulations (41 CFR Part 1-1, 45 CFR Part 5b, and 40 CFR 44502). In our introductions to each telephone or in-person interview, we will assure respondents that (1) their participation in the study is voluntary; (2) their name will never be used in reporting the results, and answers will not be released in any manner that would enable someone to identify them; (3) the information they provide will be kept private to the extent permitted by law; and (4) the information they provide will not be used for monitoring or accountability purposes and will in no way affect their employment. To further put respondents at ease, we will assure them that our study is not evaluating state or local TANF offices but is collecting information to understand how diversion programs are being used and implemented. In past research studies, this approach has helped elicit useful information from respondents about their perceptions and opinions on key topics.

Project staff members responsible for the data collection will be fully informed of MPR's policies and procedures regarding confidentiality of data. They will be trained to remind survey and site visit respondents of these procedures as necessary. MPR routinely employs the following safeguards to ensure confidentiality:

- All employees at MPR sign a confidentiality pledge that emphasizes the importance of confidentiality and describes their obligations.

- Access to personal identifying information with regard to the respondent universe for a survey and to completed hardcopy survey instruments is strictly limited to MPR staff directly involved in the survey. Documents are stored in locked files and cabinets. Discarded material is shredded.

- Computer files are protected with passwords, and access is limited to specific users. All identifying respondent information is stripped from electronic data analysis files. In addition, data are maintained on removable storage devices that are kept physically secure in when not in use.

- Data confidentiality and security at MPR's survey operation center is further ensured by code access to the center, lockable storage areas for sensitive documents, and controlled access to computerized files and systems.

K. ADDITIONAL JUSTIFICATION FOR SENSITIVE QUESTIONS

We are not collecting any sensitive data. We will ask state and local respondents about the details of their applicant programs and requirements. We also will ask about their opinions of these policies, how they believe they affect applicants' decision to enroll or not enroll in welfare, and the successes and challenges of these policies.

L. ESTIMATES OF HOUR BURDEN OF THE COLLECTION OF INFORMATION

We estimate the total respondent burden for the Identifying Promising TANF Diversion Practices study to be 137.63 hours in 2007—16.83 hours for the mail survey, 69.8 hours for telephone interviews of state and local TANF administrators, and 51 hours for the in-person site visits (Table I.1). Based on the pretest of the mail questionnaire of state TANF directors, we are estimating that the questionnaire will take an average of 20 minutes to complete. We assume that the telephone interview will average 60 minutes for about 70 percent of states and 18 minutes for the other 30 percent. Interviews with approximately 30 local offices will take no more than 60 minutes to complete. For the in-person site visits we are assuming that there will be an average of 8 respondents per site (with a maximum of 6 sites) and that most interviews will take 60 minutes to complete. All data collection will occur in 2007.

TABLE I.1

ESTIMATED RESPONSE BURDEN FOR RESPONDENTS FOR THE IDENTIFYING
PROMISING TANF DIVERSION PRACTICES STUDY

	Number of Respondents	Number of Responses per Respondent	Average Burden per Response (Hours)	Annual Burden (Hours)
Mail Questionnaire	51	1	.33	17.00
State Director Interview	51	1	.80	39.80
Local State Director Interview	30	1	1.00	30.00
Site Visit				
Administrator Interview	6	1	1.50	9.00
Supervisor Interview	12	1	1.00	12.00
Line Staff	18	1	1.00	18.00
Partner Organization	12	1	1.00	12.00
Total for 2007				**137.80**

M. ESTIMATE OF TOTAL ANNUAL COSTS AND BURDEN TO RESPONDENTS OR RECORD KEEPERS

State and local TANF offices will not incur any financial costs for participating in evaluation activities.

N. ESTIMATES OF ANNUALIZED COSTS TO THE FEDERAL GOVERNMENT

The estimated cost to the federal government through September 2007 of the Identifying Promising TANF Diversion Strategies study—including designing and administering the data collection instruments; collecting, processing, and analyzing the data; and preparing reports summarizing the results—is $288,028. This estimate is based on MPR's previous experience managing data collection efforts of these types.

O. REASONS FOR PROGRAM CHANGES OR ADJUSTMENTS

This is a new data collection effort.

P. PLANS FOR TABULATION AND PUBLICATION AND SCHEDULE FOR THE PROJECT

1. Publication Plans

As part of this data collection, we will produce one final report. The final study report, expected to be delivered in September 2007, will summarize findings from all of the data collection activities—the mail survey, state and local TANF office interviews, and local TANF office site visits. To supplement dissemination of these reports, team members will also seek to present their research at several professional conferences.

2. Tabulation Plans

a. Survey and Telephone Interviews

Based on survey and interview data with state and local TANF administrators, we will develop spreadsheets with important features of the state and local programs. Using these spreadsheets, we will be able to summarize information about these programs across state and local TANF offices.

b. Site Visits

Soon after each site visit is completed, one member of the site visit team will organize and consolidate his or her notes, consulting with the other team member as necessary. During the consolidation process, the designated staff member can identify any ambiguities or missing data elements for resolution through brief follow-up telephone calls. We will compile and synthesize all the collected information into a site-specific, internal memorandum that will be used for the analysis and writing of the final report. Each memorandum will follow a uniform outline based on the key study topics and will draw on information obtained from interviews; any program observations; and documents obtained before, during, and after the site visits. The memorandum will highlight points of disagreement and close agreement among data sources.

To facilitate cross-site comparisons, we will construct tables that summarize key findings for each site. In qualitative research, the identification of themes or categories is a standard method of data analysis (Yin 1994). In addition, the project staff members will meet after each site visit to debrief and consider what we have learned with respect to the key research questions. The meetings will provide an opportunity to discern common themes emerging from the site visits and generate ideas for information to be highlighted in the final report.

Q. APPROVAL NOT TO DISPLAY THE EXPIRATION DATA FOR OMB APPROVAL

All study materials will display the OMB expiration date.

R. EXCEPTION TO THE CERTIFICATION STATEMENT

No exceptions to the certification statement are requested.

II. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

A. RESPONDENT UNIVERSE AND SAMPLING METHODS

1. Survey and Telephone Interviews

We plan to administer the mail questionnaire to all 50 states and the District of Columbia. Similarly, all states and the District of Columbia will participate in the follow-up telephone interview. However, the length of the interview will depend on the number and types of TANF applicant diversion and employment programs implemented.

We will purposively select the 30 local TANF offices to interview based on the state interviews. First, through the state interviews, we will identify which states allow local offices to determine (1) the types of applicant programs to implement or (2) how to implement programs that have been authorized by the state. In our interviews with states that do give local offices latitude, we will ask states for their recommendations of local offices to include in the telephone interviews and the later site visits. Then, based on this information, we will purposively select local offices to interview. Our expectation is that our state interviews will indicate that about 10 states grant broad local discretion, and we will purposefully select 3 local offices in each that represent different approaches.

2. Site Visits

We will select purposively three states and two localities from each state to include in the site visits. We will select them based on the state and local interviews, a review of available public documents and data, and conversations with and recommendations of colleagues in the welfare policy and research fields. Data on diversion programs collected through the state- and local-telephone interviews will be another source of information. We will use these data to assess the extent to which particular state or local programs appear to be achieving their stated

goals. We will include in the study those programs that appear to be successful, as well as select states that allow their local offices discretion in how or what kinds of programs they implement. We also will consider states and localities that have recently changed their programs and policies in response to the DRA.

In addition, the sampling strategy will ensure that a mix of different diversion practices—such as work-related application requirements, pre-TANF job search programs, and other innovative approaches—will be included in the site visits. However, the information currently available on the solely state-funded programs indicates that many are in the very early stages of implementation and most represent a change in funding source rather than the creation of a new program that differs substantially from the state's TANF program. Consequently, we expect there would be little to learn about these programs on visits to local sites. The telephone interviews are likely to provide most of the pertinent information about their implementation. Questions about how local sites implement work-related application requirements or job-search programs may be more appropriate for site visits.

Once we have identified the site visit sites, we will contact the TANF administrator in each of the three states to inform him or her that two local offices have been selected for the site visit component of the study and enlist his or her support in eliciting the participation of the local offices. After securing local offices' agreement to participate, we will arrange convenient times to conduct the visits. Site visit respondents include local office program administrators, case managers, eligibility workers, other front-line staff who have responsibilities in the applicant programs and requirements, and administrators and front-line staff at contracted service providers and community-based organizations with responsibilities for these programs. We will ask each site to designate one contact to serve as site visit coordinator with whom we can discuss the appropriate number and combination of staff members to include in each site visit interview.

B. STATISTICAL METHODS FOR SAMPLE SELECTION AND DEGREE OF ACCURACY NEEDED

There will be no statistical methods used to select the sample of survey and telephone interview respondents or case study sites.

C. METHODS TO MAXIMIZE RESPONSE RATE AND TO DEAL WITH NONRESPONSE

1. Mail Survey and Telephone Interview

Achieving a high response rate in the mail survey and telephone interview is essential in order to capture a complete picture of states' TANF applicant diversion and employment strategies, and we will take special steps to assure success. First, MPR staff will send an advance letter to state TANF directors to inform them about the study and the survey stages (see Appendix A). The letter will explain the study's purpose and sponsors, describe what the study will entail, and assure the confidentiality of respondents. Administrators of selected local TANF offices will receive a similar letter. In addition, as we identify the local welfare offices for the telephone interview, we will inform both the state TANF director and the local offices of the selection.

Second, telephone interviews will be conducted by MPR researchers who have experience conducting interviews and are familiar with TANF programs. They are particularly attuned to addressing respondent concerns about the study and encouraging participation without alienating potential respondents. For TANF administrators who are reluctant to participate because of lack of time, interviewers will stress that the survey may be done at their convenience and over several appointment times. For those concerned about confidentiality, interviewers will explain MPR's confidentiality procedures.

2. Site Visits

We will take several steps to maximize response rates during the site visits. First, we will attempt to increase response and cooperation by guaranteeing confidentiality to all potential respondents. Before each interview, we will assure respondents that (1) their participation in the study is voluntary, (2) their name will never be used in reporting the results and answers will not be released in any manner that would enable someone to identify them, (3) the information they provide will be held in strict confidence and used only for the study, and (4) the information they provide will not be used for monitoring or accountability purposes and will in no way affect their employment.

Second, we will attempt to reduce nonresponse due to scheduling conflicts or lack of time through advance planning. All site visits will be scheduled at least one month in advance, allowing time to identify the important respondents, contact them individually, and gain assurance of their availability. We will give each site visit coordinator a detailed site visit schedule and request that he or she (1) share copies of the schedule with each respondent well in advance of the visit and (2) alert MPR staff to any problems in individuals' schedules before the visit so that alternate respondents can be identified and scheduled.

Finally, we will attempt to reduce nonresponse for other reasons by distributing to each respondent, in advance of each site visit, hardcopy materials that explain the study and its sponsors and encourage participation.

D. TEST OF PROCEDURES AND METHODS TO BE UNDERTAKEN

1. Survey and Telephone Interviews

Prior to this OMB submission, we conducted a pretest of the mail questionnaire and telephone interviews with seven states. Following receipt of the seven mail questionnaires, we discussed the questionnaire with each respondent for their feedback. Based on this feedback we

modified the questionnaire. For the pretest telephone interviews, MPR project staff conducting each interview considered whether responses to questions were consistent with the intent of the questions and whether respondents understood each question appropriately. Based on the pretest, we modified a draft version of the protocol to improve the clarity of question wording and the sequencing and flow of questions.

2. Site Visits

The site visit protocols draw heavily on MPR's experience developing protocols for other studies, such as the Implementation of TANF Sanctions study and the Assessing Medicaid and Food Stamp Program Access and Participation study. We do not believe that further testing is necessary since the protocols are intended to serve as general guides rather than instruments to be followed precisely; in this kind of data collection, early experience in the field will lead to ongoing feedback about which topics merit more or less emphasis and what avenues are most fruitful for follow-up probing to explore issues. We expect that senior staff from MPR will adapt and tailor lines of questioning in each site based on the particular circumstances in the site.

E. INDIVIDUALS CONSULTED ON THE STATISTICAL ASPECTS OF THE DESIGN

No individuals beyond the study team were consulted on the statistical aspects of the design.

REFERENCES

The Urban Institute.   "Welfare Rules Database."   Accessed October 9, 2006 from http://anfdata.urban.org/WRD/WRDWelcome.CFM.

Yin, Robert. *Case Study Research: Design and Methods, Second Edition.* Sage Publications: Thousand Oaks, CA, 1994.

APPENDIX A

ADVANCE LETTER AND QUESTIONNAIRE

January 9, 2007

TANF Director
[address]

Dear Director:

The Administration for Children and Families (ACF) has contracted with Mathematica Policy Research, Inc. (MPR) to conduct a study of state policies and programs designed to provide assistance to families before approving their application for ongoing cash assistance through the Temporary Assistance for Needy Families (TANF) block grant.

The study will be based on information collected in each state and the District of Columbia. The information will be collected in two stages. In the first stage, MPR will send you a mail survey requesting current information on your state's programs and policies that target TANF applicants. The purpose of these programs may be to divert applicants from the TANF program or prepare them for the TANF work-related requirements. In the second stage, an MPR researcher will conduct a follow-up telephone conversation to gather additional information on these policies and programs. Depending on your state's practices and policies, this interview will last between 10 and 60 minutes. Following the state interviews, MPR will collect additional information from local TANF offices in selected states through semistructured interviews and in-person visits.

While participation in this study is voluntary, the answers you provide will help ACF understand how states are assisting TANF applicants. If you have questions or would like to know more about the study, please call [xxxx].

Sincerely,

Naomi Goldstein
Director
Office of Planning, Research
   and Evaluation

cc: Files

MPR Reference No.: 6292-310
Survey Identification Number: |__|__|__|__|

OMB Approval Number: xxxx-xxxx
Expiration Date: xx/xx/xxxx

MATHEMATICA
Policy Research, Inc.

Study of Temporary Assistance for Needy Families (TANF) Diversion Practices

State TANF Director Questionnaire

January 4, 2007

Introduction

The TANF program is now more than ten years old, and each state continues to explore and experiment with methods of encouraging work and promoting self-sufficiency. The Administration for Children and Families (ACF) has initiated the TANF Diversion Practices study to better understand the strategies states are using to promote employment and self-sufficiency among families *applying* for cash assistance and to facilitate information-sharing across states about these practices. As a first step, we are asking you to complete the short questionnaire about your efforts to engage TANF *applicants* in work or work-related activities or to provide financial and other assistance to *applicant* families to divert them from the TANF program. We will use the information from this questionnaire to identify and further explore innovative strategies that may be of interest to other states. After we review your responses, we will contact you to schedule a follow-up telephone interview to gather additional information. The follow-up interview will last between 10 and 60 minutes.

Instructions

Always proceed to the next question in the survey unless special instructions tell you to go elsewhere. Most questions can be answered by simply placing a check mark in the appropriate box. For a few questions you will be asked to write in a response. Feel free to elaborate on any responses in the questionnaire margins or to provide additional thoughts about your TANF diversion program at the end of the questionnaire. Please write "DK" next to the answer category if you do not know an answer.

Please return the completed questionnaire in the enclosed return mail envelope to Mathematica Policy Research, Inc., P.O. Box 2393, Princeton, NJ 08543-2393, ATTN: Todd Ensor, or fax it to Mr. Ensor at (609) 799-0005. If you have any questions, please call Todd Ensor at (609) 275-2326.

Employment, Self-Sufficiency, and Alternative Income
Support Strategies for TANF Applicants

Please provide the following information for strategies you may have in place, or are planning to put into place, for families who *apply* for cash assistance.

| Section A. Lump Sum Payments To Divert |
| Applicants From TANF Assistance |

A1. **Does your state offer or plan to offer lump sum payments (via cash, vendor payments, or vouchers) to families applying for cash assistance with the intent of alleviating the need for TANF assistance?**

1 ☐ Yes, statewide — **Go to A2**

2 ☐ Yes, at county discretion — **Go to B1**

0 ☐ No — **Go to B1**

A2. **Please record the month and year of initial or planned implementation of this program.**

|___|___| / |___|___|
Month   Year

| Section B. Pre-TANF Job Search and Assessment |
| Programs That Provide Short-Term |
| Financial Assistance |

B1. **Does your state have or plan to implement a program separate from your TANF cash assistance program that provides *short-term* financial assistance to families who apply for TANF assistance while they participate in job search, complete an employability assessment, or participate in other work-related activities?**

1 ☐ Yes, statewide — **Go to B2**

2 ☐ Yes, at county discretion — **Go to C1**

0 ☐ No — **Go to C1**

B2. **Please record the name of that program.**

_____

_____

_____

B3. **Is this program targeted to all eligible TANF applicants (excluding child-only cases) or a subset of applicants with certain characteristics?**

1 ☐ All eligible applicants

2 ☐ Subset of eligible applicants

B4. **Is participation in this program voluntary or mandatory for the target population?**

1 ☐ Voluntary

2 ☐ Mandatory

B5. **Please record the month and year of initial or planned implementation of this program.**

|___|___| / |___|___|
Month   Year

| Section C. Work-Related TANF Application |
| Requirements |

C1. **In this section we ask about your state's current or planned work-related requirements that all or some TANF applicants complete *before* they are approved to receive TANF cash assistance.**

Are TANF applicants required to participate in an orientation program focused on work requirements or employment-related activities?

1 ☐ Yes, statewide — **Go to C2**

2 ☐ Yes, at county discretion — **Go to C4**

0 ☐ No — **Go to C4**

C2. **Is a family's application for TANF cash assistance denied if they fail to comply with the requirement?**

1 ☐ Yes

0 ☐ No

C3. Please record the month and year of initial or planned implementation of this requirement.

|___|___| / |___|___|
Month   Year

———————————————————————

C4. Are TANF applicants required to complete a plan that outlines what steps they will take to find employment or move towards self-sufficiency?

   1 ☐ Yes, statewide — **Go to C5**

   2 ☐ Yes, at county discretion — **Go to C7**

   0 ☐ No — **Go to C7**

C5. Is a family's application for TANF cash assistance denied if they fail to comply with the requirement?

   1 ☐ Yes

   0 ☐ No

C6. Please record the month and year of initial or planned implementation of this requirement.

|___|___| / |___|___|
Month   Year

———————————————————————

C7. Are TANF applicants required to register for work?

   1 ☐ Yes, statewide — **Go to C8**

   2 ☐ Yes, at county discretion — **Go to C10**

   0 ☐ No — **Go to C10**

C8. Is a family's application for TANF cash assistance denied if they fail to comply with the requirement?

   1 ☐ Yes

   0 ☐ No

C9. Please record the month and year of initial or planned implementation of this requirement.

|___|___| / |___|___|
Month   Year

———————————————————————

C10. Are TANF applicants required to participate in a job search?

   1 ☐ Yes, statewide — **Go to C11**

   2 ☐ Yes, at county discretion — **Go to D1**

   0 ☐ No — **Go to D1**

C11. Is a family's application for TANF cash assistance denied if they fail to comply with this requirement?

   1 ☐ Yes

   0 ☐ No

C12. Please record the month and year of initial or planned implementation of this requirement.

|___|___| / |___|___|
Month   Year

Section D. Consideration of Alternative Resources

D1. As part of the TANF application process, are intensive services provided to help applicants find other means of assistance in lieu of receiving TANF?

   1 ☐ Yes, statewide — **Go to D2**

   2 ☐ Yes, at county discretion — **Go to E1**

   0 ☐ No — **Go to E1**

D2. Please record the month and year of initial or planned implementation of these services.

|___|___| / |___|___|
Month   Year

Section E. Solely State-Funded Cash Assistance Programs

E1. **Does your state have or plan to implement a program that is funded solely by state or local dollars (not TANF or TANF Maintenance of Effort (MOE) dollars) that provides *ongoing* financial assistance to families with children who would otherwise be eligible for TANF?**

1 ☐ Yes, statewide — **Go to E2**

2 ☐ Yes, at county discretion — **Go to F1**

0 ☐ No — **Go to F1**

E2. **Please provide the name of this program.**

_____

_____

_____

_____

E3. **Is this program available to families who are *applying* for TANF assistance?**

1 ☐ Yes, statewide — **Go to E4**

2 ☐ Yes, at county discretion — **Go to F1**

0 ☐ No — **Go to F1**

E4. **To which types of TANF applicants is this program targeted?**

Mark Yes or No for each type

		Yes	No
a.	Two parent families?.........................	1 ☐	0 ☐
b.	Families with a household head attending college?............................	1 ☐	0 ☐
c.	Families experiencing personal or family challenges?	1 ☐	0 ☐
d.	Other types of families *(Please describe below)*	1 ☐	0 ☐

_____

_____

_____

E5. **Is participation in this program voluntary or mandatory for the target population?**

1 ☐ Voluntary

2 ☐ Mandatory

E6. **Please record the month and year of initial or planned implementation of this program.**

|___|___| / |___|___|
 Month   Year

Section F. Final Comments

F1. **Please provide us with materials such as regulations, reports, or educational material you have describing these policies or programs. If they are available on-line, please provide us with the link and we will download them.**

Web Links:_____

_____

_____

_____

_____

F2. **We will be following up shortly to discuss your state's responses in this questionnaire. In the meantime, please write in any comments that might help us prepare for this discussion.**

_____

_____

_____

_____

_____

_____

_____

_____

_____

F3. Please enter the name and telephone number of the person who completed this questionnaire.

_____

Telephone Number:

(|___|___|___|)-|___|___|___|-|___|___|___|___|
  Area Code

F4. Please enter the name and telephone number of the person we should contact for the follow-up telephone interview, if different from the person who completed this questionnaire.

_____

Telephone Number:

(|___|___|___|)-|___|___|___|-|___|___|___|___|
  Area Code

F5. Thank you for completing this survey. Please return it in the enclosed return envelope to Todd Ensor at Mathematica Policy Research, Inc., P.O. Box 2393, Princeton, NJ 08543-2393 or fax it to Mr. Ensor at (609) 799-0005. We will follow up by phone shortly.

APPENDIX B

STATE AND LOCAL TELEPHONE INTERVIEW GUIDES

TANF DIVERSION STUDY

STATE AND LOCAL TELEPHONE INTERVIEW PROTOCOL

Introduction

In the mail survey you completed last month you indicated that the state targets the following programs or requirements to applicants for TANF assistance: [name programs].

[Local interview: From discussions we have had with the state TANF office, we understand that your local office has implemented the following program(s) targeted to applicants for TANF assistance: [programs] .]

The purpose of this interview is to learn more about each of these programs. First, I would like to discuss each of these programs with you and, then, I will ask you some general questions about the state's [local office's] overall strategy.

We would like to start with [name of program].

Modules

Module 1: Formal Diversion Payments (Lump-Sum Payment)

Module 2: Job Search and Other Work-Related Requirements

Module 3: Alternative Resources

Module 4: Pre-TANF Job Search and Assessment Program with Cash Assistance

Module 5: Solely State-Funded Cash Assistance Program

Concluding Questions

Is the state trying to achieve a broader goal with its mix of applicant requirements and programs? If so, how well is this mix meeting the state's goals?

Are there any approaches you would like to see the state take with respect to diverting TANF applicants and/or preparing them for the work-participation requirements?

How has the state's [local office's] overall approach to diverting applicants been influenced by passage of the DRA?

Are there new programs or approaches being considered by the state [local office] to divert applicants from TANF? Please describe.

Thank you for your time.

MODULE 1: FORMAL DIVERSION PAYMENTS

I.   Program Details

We have obtained information from the Urban Institute on the structure of your formal diversion payment or lump sum payment program. We would like to review this information and then ask you some additional questions: [Review the following information]

      Maximum Payment Amount
      Form of payment
      How often recipient can receive payment
      Period of TANF ineligibility without penalty after payment
      How the payment is treated with regards to the time limit

II.   Program Goals/Scope

1. What is the primary purpose/goal of the lump sum payment program?

2. Was the program created through state legislation or administratively?

3. What is the funding source for this program? If state money supports this program, how has this affected the funding for other state programs?

4. Do county or local offices have any discretion to offer a formal diversion payment that is different than what we just reviewed? If yes, please describe.

III.   Eligibility

1. To whom is the program targeted?

2. Are there explicit criteria that an applicant must meet to be considered for the program? If so, what are the criteria?

3. For those applicants that meet the program criteria, is the program mandatory or voluntary?

4. Are there any circumstances under which an applicant who does not meet the program criteria can receive a diversion payment? Please describe.

5. Are the income and assets criteria for eligibility the same as for the TANF program?

    -   If no: How are they different?

IV.   Recruitment and Screening

1. What strategies are used to inform and recruit applicants to participate in the program? When is an applicant informed about the program and by whom?

2. How are intake or eligibility workers trained to discuss the option of a lump sum payment with applicants? Who trains them?

3. How consistently do you think these discussions occur between workers and applicants?

4. At what point in the application process do these discussions occur? What event or information triggers the discussion?

5. Which workers screen applicants and manage the payments?

V. Payment

1. How is the amount of the payment determined? What information does the applicant need to provide to demonstrate the need for the payment? How much discretion do workers have in determining the payment amount?

2. Are there restrictions on how the payment can be used? Do workers have discretion on how it is used?

3. Over what time period is the payment received?

4. Is participation in any work activity required to receive the payment? If yes, what is the requirement?

VI. Application Processing

1. How much time do you have to make a decision on an application? Does the clock start ticking at the time the initial application is submitted or after the completion of any pre-application work requirements?

2. What is the disposition of a participant's initial TANF application?

3. How is the participant's application for other supports (Medicaid, food stamps) handled? How does this change if an applicant finds employment?

4. How are participants' payments treated in determining eligibility for Medicaid and food stamps?

5. If a person receives a lump sum payment, are they eligible to receive any other kind of supports either while receiving the lump sum or if they find a job? [child care, transportation, case management, education and training]

VII. Participation and Outcomes

1. What proportion of applicants is considered for the program? Of those considered, what proportion receives a lump sum cash payment? How many applicants enroll in the program during an average month?

2. How do you track participation in the program?

3. To what extent do you maintain data on participation and outcomes (participation rates, employment rates, proportion reapply for assistance)? [request data]

4. Do you have any data or reports that compare the outcomes of lump-sum recipients with families that receive TANF assistance? [If so, request data/reports]

VIII. Successes/Challenges/Advice for Other States

1. To what extent is the program achieving its goals?

2. What challenges have you had to overcome to implement the program? What strategies helped you to overcome those challenges?

3. What lessons have you learned that you would like to pass along to states that are considering implementing a similar program?

4. Have you made or considered making any changes to this requirement since the reauthorization of TANF? Please describe.

5. Which counties or local offices have done an exemplary job implementing the program and/or have had high participation rates? What do they do differently than other offices?

MODULE 2: JOB SEARCH AND OTHER WORK-RELATED REQUIREMENTS

**(WORK PROGRAM ORIENTATION, WORK REGISTRATION
OR DEVELOPMENT OF AN EMPLOYMENT PLAN)**

You indicated that TANF applicants are required to complete [the program requirement] as a condition of eligibility for TANF. We would like to learn more about this requirement, including what is expected of applicants, what assistance is available to them and what happens if they do not complete the requirement.

I.   Program Goals/Scope

1.   What is the primary purpose/goal of requiring applicants to [insert program requirement] as a part of the TANF application process?

2.   Was this requirement created through state legislation or administratively?

3.   What is the funding source for this program? If state money supports this program, how has this affected the funding for other state programs?

4.   Is [the program requirement] required statewide or only in selected areas?

5.   Do county or local offices have any discretion in defining or altering [the program requirement]? If yes, please describe.

II.   Eligibility

1.   Who is required to complete the [program requirement]? How do you determine if someone should be exempted from this requirement?

2.   Are there any circumstances in which this requirement can be waived? Please describe.

3.   How is the participant's application for other supports (Medicaid, food stamps) handled while they are completing the [program requirement]?

III.   Recruitment and Screening

1.   What strategies are used to inform applicants about this requirement? When is an applicant informed about the requirement and by whom?

2.   Who explains this requirement to applicants?

IV.   Program Structure

1.   How is the [program requirement] structured? What must the applicant do? Over what period of time?

2.   What assistance is provided to participants to help them meet this requirement? Who provides this assistance? [the TANF agency; another government agency,

such as the One Stop Career Center or the Workforce Development agency; or a contractor]

3. Is child care assistance available for participants? If yes, is there a formal process for linking participants with child care assistance? If so, please describe this process.

4. Where does an applicant have to go to complete the requirement? Is an applicant given an appointment to complete the requirement or are they required to schedule a time on their own? What are the options for rescheduling if an applicant misses an appointment?

5. How long does it take to complete the requirement?

6. For job search requirements, how is participation monitored? Who monitors participation?

V. Consequences for Not Participating

1. What are the consequences for not completing the requirement?

2. If an applicant begins to participate but then stops participating, are any efforts in place to reengage them?

3. How much time do you have to make a decision on an application? Does the clock start ticking at the time the initial application is submitted or after the completion of any pre-application work requirements?

4. What is the disposition of the TANF application if an applicant does not complete the requirement?

5. When can the applicant reapply for assistance if their application is denied for failing to meet the requirement?

6. What happens to a participant's applications for food stamps and Medicaid if they do not complete the requirement?

VI. Participation

1. What proportion of applicants is required to complete [the program requirement]?

2. Of those required to complete the requirement, what proportion complete it?

3. How do you track completion of the requirement?

4. To what extent do you maintain data on who completes the requirement and who finds employment? [request data]

VII. Employment (Job search requirements only)

1. What proportion of applicants finds employment before going on to TANF?

2. How is the TANF application handled if an applicant finds employment? How is their eligibility for TANF determined?

3. Is an applicant who finds employment before going on to TANF eligible for the same earnings disregard as a TANF recipient who finds employment? If not, how does the earnings disregard differ for applicants?

4. If they find employment and are not eligible for TANF, are they eligible for the same benefits as a TANF recipient who finds employment and exits TANF? If not, what is different?   Do you offer a post-employment TANF program or exit bonus for TANF recipients?   Are applicants who find employment eligible for this program or bonus?

5. How is the food stamp and Medicaid application handled if the applicant finds a job?

VIII.   TANF Transition (Job search requirements only)

1. If an applicant does not find employment or finds employment and is still eligible, how is the transition to TANF handled?

2. What work activity are they required to participate in?

3. Do they undergo an assessment? If so, when?

IX.   Successes/Challenges/Advice for Other States

1. To what extent is the program achieving its goals?

2. What challenges have you had to overcome to implement the requirement? What strategies helped you to overcome those challenges?

3. What lessons have you learned that you would like to pass along to states that are considering implementing a similar requirement?

4. Have you made or considered making any changes to this requirement since the reauthorization of TANF? Please describe.

5. Which counties or local offices have done an exemplary job of implementing [the program requirement]? What makes them exemplary?

MODULE 3: ALTERNATIVE RESOURCES

You indicated that as a part of the application process, eligibility workers are required to explore the availability of alternative resources (such as family or friends or services provided by community organizations) with families applying for assistance. We would like to learn more about this requirement and how it is implemented.

I.   Program Goals/Scope

1. What is the primary purpose/goal of this approach?

2. Was this approach created through state legislation or administratively? When?

3. What is the funding source for this program? If state money supports this program, how has this affected the funding for other state programs?

4. Is this approach implemented statewide or only in selected areas?

5. Do county or local offices have any discretion in defining or altering this requirement? Please describe.

6. Have you made or considered making any changes to this approach since the reauthorization of TANF?

7. What public agency or other organization manages this program?

II.   Eligibility

1. To whom is the consideration of alternative resources targeted?

2. Are there any circumstances when an applicant can choose to apply for TANF rather than accessing alternative resources even when identified?

III.   Recruitment and Screening

1. What strategies are used to inform applicants that they must consider alternative resources before their TANF application can be approved? When is an applicant informed about the requirement and by whom?

2. Can you describe when this discussion takes place and what instructions workers have been given about how to facilitate this discussion?

3. Is information gathered as a part of the written TANF application that helps to guide this discussion. Or, does the intake worker initiate the discussion during the eligibility interview?

4. Who conducts this discussion with applicants? How are they trained?

5. How consistently do you think these discussions occur between workers and applicants?

6. How does a worker determine whether alternative resources are available and accessible to an applicant?

7. If alternative resources are identified, what is the next step? Is the TANF application placed on hold? If so, for what period of time or until what specific requirement is met?

IV.   Outcomes

1. How often are workers able to identify alternative resources that alleviate the need to apply for TANF benefits? How often is a TANF application withdrawn or denied because a family's needs can be met through alternative resources?

2. How do you track which applications are withdrawn or denied because alternative resources have been identified?   [request data]

V.   Successes/Challenges/Advice for Other States

1. To what extent is the program achieving its goals?

2. What challenges have you had to overcome to implement the program? What strategies helped you to overcome those challenges?

3. What lessons have you learned that you would like to pass along to states that are considering implementing a similar program?

4. Have you made or considered making any changes to this requirement since the reauthorization of TANF?

5. Which counties or local offices have done an exemplary job of implementing this approach? What makes them exemplary?

**MODULE 4: PRE-TANF JOB SEARCH AND ASSESSMENT PROGRAMS
WITH CASH ASSISTANCE**

You indicated on your survey form that you have implemented a program separate from your TANF programs that provides *short-term* financial assistance to families who apply for TANF assistance while they participate in job search, complete an assessment, or participate in other work-related activities.

I.   Program Goals/Scope

1.   What is the primary purpose/goal of providing a pre-TANF program that provides financial assistance and requires individuals to participate in work activities?

2.   Was this program created through state legislation or administratively?

3.   What is the funding source for this program?   If state money supports this program, how has this affected the funding for other state programs?

4.   Is the program available statewide or only in selected areas? Please describe.

5.   Do county or local offices have any discretion in defining or altering the structure of this program? Please describe.

6.   What influence did increased work participation rates as a result of TANF reauthorization have on the implementation of this program?

7.   How is the program funded? Is financial assistance claimed as assistance or non-assistance for TANF/MOE reporting purposes?

8.   What public agency or other organization manages this program?

II.   Eligibility

1.   What are the eligibility criteria for the pre-TANF program? Which applicants are exempted from participation in the pre-TANF program? How do you determine if someone should be exempted from this requirement? Is participation in the pre-TANF program mandatory for eligible applicants?

2.   For applicants who meet the eligibility criteria, are there any circumstances in which this requirement can be waived and applicants can apply directly to TANF?

III.   Recruitment and Screening

1.   What strategies are used to inform applicants about this program? When is an applicant informed about the program and by whom?

IV. Financial Assistance

We would like to first learn more about the financial assistance component of the program and then learn about the services and work component.

1. What is the maximum amount of financial assistance a family can receive through this program? How does this compare to the amount of assistance they can receive from TANF?

2. How is the amount of assistance determined? What information does the applicant need to provide to demonstrate the need for the assistance?

3. How is the financial assistance provided to participants? (e.g., cash, voucher, vendor payment)

4. How often is the financial assistance provided?

5. Are there any constraints on how the assistance can be used?

6. What is the maximum amount of time a family can receive assistance through the program?

7. Do the months when a family is receiving financial assistance count toward the time limit?

V. Interaction with Other Programs

1. How is the participant's application for other supports (Medicaid, food stamps) handled?

2. Are families eligible for child care and other work supports while they are participating in the pre-TANF program? If yes, is there a formal process for linking participants with child care assistance? If so, please describe this process.

3. How are earnings treated while a family is in the pre-TANF program?

4. Are child support payments collected on behalf of families in the pre-TANF program retained by the state? How does this differ from the TANF program? Does child support distributed to families in the pre-TANF program reduce the financial assistance they receive through the program? Does the state disregard any of the child support income to determine the amount of financial assistance?

VI. Work Activity Requirement

1. In what type of work activities are program participants required to participate?

2. If all participants do not participate in the same activity, what determines the activity in which they participate?

3. What level of participation is required in the work activity? Over what period of time?

4. What assistance is provided to participants? Who provides this assistance? [the TANF agency; another government agency, such as the One Stop Career Center or the Workforce Development agency; or a contractor]

5. How long does participation in the program last?

6. How is participation monitored? Who monitors participation?

VII.   Consequences for Not Participating

1. What happens if a participant stops participating? Are any efforts required to reengage them?

2. What are the consequences for not participating? What happens to their financial assistance?

3. When can they reapply for the program?

VIII.   Transition to TANF

1. Under what circumstances is a family transitioned onto TANF?   What happens when a family reaches the maximum amount of time in the pre-TANF program?

2. How does this transition occur?

3. Is the transition automatic or does the family have to complete a separate application for TANF?

4. If participants of this program are working, how are earnings treated when they transition to TANF? Are they eligible for the same benefits as a TANF recipient who finds employment? If not, what is different?

    - Is a participant who finds employment eligible for the same earnings disregard as a TANF recipient? If not, how does the earnings disregard differ for participants?

5. What benefits are available for families who find employment and are not eligible for TANF due to earnings? Are they eligible for the same benefits as a TANF recipient who finds employment? If not, what is different?

6. What work activity are participants required to participate in once on TANF?

IX.   Participation and Outcomes

1. How do you track participation in the program?

2. What proportion of applicants is required to participate in the pre-TANF program?

3. Of those required to participate, what proportion do so? What proportion finds employment before transferring to TANF?   What proportion does not find

employment, but does not transfer to TANF? What proportion transfers to TANF?

4. What other data do you maintain on program participation and outcomes? [request all data/reports]

X.   Successes/Challenges/Advice for Other States

1. To what extent is the program achieving its goals?

2. What challenges have you had to overcome to implement the program? What strategies helped you to overcome those challenges?

3. What lessons have you learned that you would like to pass along to states that are considering implementing a similar program?

4. Which counties or local offices have done any exemplary job of implementing the pre-TANF program? What makes them exemplary?

MODULE 5: SOLELY STATE-FUNDED CASH ASSISTANCE PROGRAMS

You indicated on your survey form that you have implemented a financial assistance program funded solely with state or local dollars that provides ongoing financial assistance to families with children and in which families are not considered to be on TANF. We would like to learn more about this program.

I.   Program Goals/Scope

1. What is the primary purpose/goal of creating a state program that provides cash assistance to families with children?

2. Was this program created through state legislation or administratively?

3. What is the funding source for this state program? What state programs are no longer funded as a result of this program?

4. Is the program available statewide or only in selected areas?

5. Do county or local offices have any discretion in defining or altering the structure of this program? Please describe.

6. What influence did increased work participation rates resulting from TANF reauthorization have on the implementation of this program?

II.   Eligibility

1. Which families are eligible for this program?

2. Does this program target new applicants, families that have been receiving TANF assistance or both?

3. Is participation in the solely state-funded program mandatory for any families who meet particular criteria?

4. How is eligibility for the program determined? How does the eligibility criteria differ from your TANF program?

5. Is the application process for this program separate from the application process for TANF? If yes, can you describe the application process?

6. Does the solely state-funded program have the same rules and regulations as the state's TANF program? If no, how does the program differ?

If no, complete subsequent sections of the protocol as needed. If yes, skip to section X of the protocol.

III. Recruitment and Screening

1. What strategies are used to inform families about this program? If participation in the program is optional, how are families informed of the option and of any consequences for not participating?

IV. Financial Assistance

1. What is the maximum amount of financial assistance a family can receive through this program? How does this compare to the amount of assistance they can receive from TANF?

2. How is the amount of assistance determined?

3. How is the financial assistance provided to participants? (e.g., cash, voucher, vendor payment)

4. Are there any restrictions on how this assistance can be used?

5. How often is the financial assistance provided?

6. What is the maximum amount of time a family can receive assistance through the program? Is this time limit for receiving assistance through the solely state-funded program based on the TANF time limit?

7. Does assistance received through the solely state-funded program count towards the TANF time limit?

8. If there is no time limit on participation, are there other events that can cause families to exit the program or transition into another program? Describe.

V. Interaction with Other Programs

1. How is the participant's application for other supports (Medicaid, food stamps) handled?

2. Are families eligible for child care and other work supports while they are participating in this program?

3. Are child support payments collected on behalf of families in the solely state-funded program retained by the state? How does this differ from the TANF program? Does child support distributed to families in the solely state-funded program reduce the financial assistance they receive through the program? Does the state disregard any of the child support income to determine the amount of financial assistance?

4. How is eligibility for Medicaid or Transitional Medical Assistance handled for families that exit the solely state-funded program? If the state offers Transitional Food Stamps, how is eligibility for Transitional Food Stamps handled for families that exit the solely state-funded program?

VI. Work Activity Requirement

1. In what type of work activities are program participants required to participate?

2. If all participants do not participate in the same activity, what determines the activity in which they participate?

3. What level of participation is required in the work activity? Over what period of time?

4. What assistance is provided to participants? Who provides this assistance? [the TANF agency; another government agency, such as the One Stop Career Center or the Workforce Development agency; or a contractor]

5. Who monitors their participation?

VII. Consequences for Not Participating

1. What happens if a participant stops participating? Are any efforts required to reengage them?

2. What are the consequences for not participating? What happens to their financial assistance?

3. When can the applicant reapply for the program?

VIII. Transition to TANF

1. Are families participating in this program ever eligible for TANF? Describe.

2. If so, what is the process for transferring families from this program to TANF? Is the transition automatic or does the family have to complete a separate application for TANF?

3. If a family finds employment, how are earnings treated when families transition to TANF?

4. What benefits are available for families who find employment and are not eligible for TANF due to earnings?

IX. Participation and Outcomes

1. How many families are currently participating in this program?

2. In an average month, how many families apply for or are transferred to the program?

3. Among families applying directly to the program, how many families have been deemed eligible? How many of these families were initially applicants for TANF?

4. How do you track participation in the program?

5. What other data do you maintain on program participation and outcomes? [request all data/reports]

X.   **Successes/Challenges/Advice for Other States**

1. To what extent is the program achieving its goals?

2. What challenges have you had to overcome to implement the program? What strategies helped you to overcome those challenges?

3. What lessons have you learned that you would like to pass along to states that are considering implementing a similar program?

TANF DIVERSION STUDY

TELEPHONE INTERVIEW PROTOCOL:
STATES WITH NO REQUIREMENTS OR PROGRAMS

You indicated on your survey form that you do not currently engage TANF applicants in work or work-related activities before their application is approved, or provide financial and other assistance to applicant families through programs outside of your regular TANF program. We would like to ask you a few questions about whether your state has any *past* experience with these types of programs and/or requirements.

I.   Introduction

1. In the past, has your state ever:

Offered lump sum payments (via cash, vendor payments, or vouchers) to families applying for cash assistance with the intent of alleviating the need for TANF assistance?

Required all or some TANF applicants to complete any of the following *before* they are approved to receive TANF cash assistance:

   - An orientation focused on work requirements and/or employment-related activities?

   - A plan that outlines what steps they will take to find employment and/or move towards self-sufficiency?

   - Registration for work?

   - Participation in work-related activities, such as job search?

Required applicants to explore the availability of alternative resources (such as family or friends or services provided by community organizations) as part of your application process?

Implemented a program separate from your TANF cash assistance program that provides *short-term* financial assistance to families who apply for TANF assistance while they participate in job search, complete an employability assessment, or participate in other work-related activities?

Established programs that are funded solely by state or local dollars (not TANF or TANF MOE dollars) that provide *ongoing* financial assistance to families with children and in which families are not considered to be on TANF?

II.   States with Prior Experience

If the state has prior experience with any of the above programs/requirements, ask questions 2-8 for each program/requirement.

1. When was the program/requirement first implemented and how long did it exist?

2. Was the program/requirement created through state legislation or administratively?

3. What was the primary purpose or goal of the program/requirement?

4. Did the program/requirement target a specific type of welfare applicant?

5. Did county or local offices have discretion in defining or altering the program/requirement?

6. Did the state collect any data on participation or outcomes for the program/requirement (participation rates, employment rates, proportion who reapply for assistance)? Please describe.

7. Why did the state end/discontinue the program/requirement?

8. What were the main lessons learned from implementing the program/requirement?

9. Does the state have plans to reconsider this type of program in light of TANF reauthorization or the interim final regulations?

   If yes, why? When does the state expect to implement the program/requirement? How will it differ from the state's previous program/requirement (purpose/goal, target population, implications for TANF application)? Is it a statewide program or a program implemented at a county's discretion?

   If no, why not?

III. States with No Prior Experience

If the state does not have prior experience with any of the above programs, ask the following question:

1. Has the state considered implementing these types of programs/requirements for applicants in light of TANF reauthorization or the interim final regulations?

   If yes, what type of program/requirement did the state consider/is the state considering? Is the state planning to implement the program/requirement? Why or why not? If the state is planning to implement the program/requirement, please describe it (projected start date, purpose/goal, target population, implications for TANF application). Is it planned as a statewide program or a program implemented at county discretion?

   If no, why has the state not considered these types of programs/requirements?

APPENDIX C

SITE VISIT INTERVIEW GUIDES

IDENTIFYING PROMISING TANF DIVERSION PRACTICES STUDY

SITE VISIT GUIDE: GENERAL INTRODUCTION

Thank you for taking the time to speak with me today. My name is [X], and I am a [TITLE] with Mathematica Policy Research, Inc. (MPR), a nonpartisan research firm. The Office of Planning, Research, and Evaluation (OPRE) under the Administration for Children and Families (ACF) has contracted with MPR to conduct a study of state policies and programs designed to provide assistance to families before approving their application for ongoing cash assistance through TANF. Through this study, we will examine the types of strategies states and local offices are using.

During our conversation, I would like to hear about your experiences with these applicant diversion and employment strategies, and will also ask you your opinions. I will ask you about (1) the purpose of the program and how it was developed, (2) details of the program and the kind of data kept on participants, and (3) your perceptions of the successes and challenges in implementing and operating the program.

Everything you say will be kept private to the extent permitted by law. The information we gather will be used to write a report about states' experiences implementing these activities, including their successes, challenges, and lessons learned. Our report will describe experiences and views expressed by staff across states, but comments will not be attributed to specific individuals or states. Staff members will not be quoted by name.

Do you have any questions before we get started?

IDENTIFYING PROMISING TANF DIVERSION PRACTICES STUDY

SITE VISIT GUIDE – ADMINISTRATOR

A. Goal/Purpose

1. What is the primary goal or purpose of the work-related application requirement/job search program? Have the goals of the requirement evolved or changed over time? If so, in what ways and why?

2. What was the impetus for implementing the work-related application requirement/job search program? Was it imposed in response to a change in federal/state/local policy? If so, how does it address the policy or policy change?

3. For pre-TANF job search with cash assistance program: Why did you decide to establish a separate short-term financial assistance program with work requirements?

4. For older work-related application requirements/job search program: How has the Deficit Reduction Act (DRA) or release of the subsequent federal regulations affected the original work-related application requirement/job search program?

5. For office with multiple work-related application requirements: How do the different applicant requirements complement each other?

6. Please describe the requirements and/or programs available to TANF applicants. Who do they target and what is required or available?

B. Development Process

1. When was the work-related application requirement/job search program first implemented?

2. What were the start up issues and challenges, if any?

3. What was the local office's role in developing the work-related application requirement/job search program?

4. What funds are used to support and implement the work-related application requirement/job search program [federal, state MOE, or separate state funds]? Why are these types of funds used? Has the source of funding for the program changed over time? If so, how and why?

5. How much funding is currently allocated for the work-related application requirement/job search program? How long is the funding period?

6. What kinds of support did the local office receive from the state or other local offices in implementing the work-related application requirement/job search program? [e.g., rely on experiences of other local offices/states; receive resources from the state]

7. How much discretion do local offices have in implementing the work-related application requirement/job search program? Do local offices have discretion over any of the following:

   - Eligibility requirements
   - Screening process
   - Selecting partners
   - Determining types of job search assistance or services

C. Tracking Applicant/Participant and Program Outcomes

1. Where is applicant/participant information stored? Is it included in the TANF administrative data system or a separate system? How are applicants/participants tracked during their participation in the work-related application requirement/job search program? Who is responsible for entering and tracking this information?

2. Are there any applicants/participants whose information is not entered into the data system (e.g., applicants/participants that do not complete the application process, applicants/participants that do not complete the job search requirement)?

3. Describe the data collected on TANF applicants/participants who do not end up receiving TANF. [collect any available reports]

   - What demographic data are collected?

   - Is there information on the services provided to these participants?

   - What information is collected on participant outcomes, including employment and TANF receipt?

   - Is it possible to determine whether a participant reapplied for TANF or received TANF benefits after participation in the program/activity?

   - What information is available on employment, including type of employment, wages, or hours for this population?

4. How accessible are the data? How long have the data been collected?

5. How are the data used? To determine eligibility for later TANF eligibility? To monitor program outcomes?

6. What are the challenges associated with collecting these data?

7. How many families who start the TANF application process or enter the pre-TANF job search program do not continue? For what reasons? What are the characteristics of these families?

8. What are the employment outcomes for applicants/participants participating in the work-related application requirement/upfront job search program? What were the characteristics of applicants who obtained work during the work-related application requirement/job search program?

9. How has the work-related application requirement/upfront job search program affected the office's TANF caseload? To what extent do TANF applicants not receive cash assistance through TANF as a result of the work-related application requirement/job search program?

10. For Work-Related Application Requirements: What percentage of applicants enroll in TANF after completing the work-related application requirement? What percentage of applicants who do not meet the application requirement reapply to TANF at a later date?

11. For Pre-TANF Job Search Programs: What percentage of participants (a) finish the program, (b) find employment, (c) transfer onto TANF, (d) do not complete the program, or (e) reapply to TANF?

12. How has the requirement/program affected the work participation rate? Did it have the intended effect? Why or why not?

D. Successes, Challenges

1. Was the work-related application requirement/job search program implemented as expected? How did implementation differ from what was expected? Why?

2. Which aspects of the program/activity worked well and which aspects did not? Why?

3. What are the major challenges in implementing the program/activity? How were these challenges addressed?

4. To what extent is the work-related application requirement/job search program meeting its purpose/goals? What information/data is this assessment based on?

5. Are you satisfied with the numbers and outcomes of applicants participating in the work-related application requirement/job search program? Why or why not?

6. How has the program improved your ability to meet the TANF program changes resulting from DRA and the new federal regulations?

7. What, if any, unexpected positive or negative consequences resulted from the work-related application requirement/job search program? Explain.

8. What are the main lessons learned from your experience implementing the requirement/program? What lessons were learned regarding:

   - Eligibility/screening process
   - Stringency of penalties
   - Funding
   - Staffing
   - Orientation
   - Support services

9. What would you have done differently in implementing your applicant program or requirement? What advice would you give to another state or local office considering this type of program/requirement?

10. Are there new programs or approaches being considered by the state [local office]? Please describe.

11. Is there a different approach you would like to see the state/office take with respect to diverting TANF applicants and/or preparing them for the work-participation requirements? Please describe.

IDENTIFYING PROMISING TANF DIVERSION PRACTICES STUDY

SITE VISIT GUIDE – SUPERVISOR

A. Goal/Purpose

1. What is the primary goal or purpose of the work-related application requirement/job search program? Have the goals of the requirement evolved or changed over time? If so, in what ways and why?

2. For older work-related application requirements/job search program: How has the Deficit Reduction Act (DRA) or release of the subsequent federal regulations affected the original work-related application requirement/job search program?

3. For office with multiple work-related application requirements: How do the different applicant requirements complement each other?

B. Development Process

1. What were the start up issues and challenges, if any?

2. What was the local office's role in developing the work-related application requirement/job search program?

3. What kinds of support did the local office receive from the state or other local offices in implementing the work-related application requirement/job search program? [e.g., rely on experiences of other local offices/states; receive resources from the state]

4. How much discretion do local offices have in implementing the work-related application requirement/job search program? Do local offices have discretion over any of the following:

   - Eligibility requirements
   - Screening process
   - Selecting partners
   - Determining types of job search assistance or services

C. TANF Application Process

1. Please describe the sequence of steps in the TANF application process and the specific timing of required activities such as (a) attending an orientation, (b) completing an employability plan, or (c) conducting an upfront job search?

   Specifically:

- What steps in the TANF/pre-TANF application process occur before and/or between each work-related application requirement, or before the job search program?

- How much of the TANF/pre-TANF application is completed before the work-related application requirement/job search program?

- Is a determination of TANF/pre-TANF eligibility made before an applicant completes the work-related application requirement/job search program?

2. What is the typical amount of time between first entrance to the welfare office and each work-related requirement?

3. How do applicants first hear about the work-related application requirements, and from whom? What is the message conveyed to applicants regarding the work-related application requirements?

4. Is the requirement/program mandatory for all applicants? If not, what type of welfare applicant does the requirement/program target? Why is this population targeted? What information is gathered from the applicant to determine whether they are required to complete the requirement/program?

5. Are any applicants exempted from the requirement/program? How much discretion do program staff have in determining eligibility and granting exemptions from the requirement/program? What is the process for determining whether someone should be exempt from the requirement/program?

6. For older program/requirement: Have the eligibility requirements changed over time? How? Why?

D. Orientation Requirement (ask if applicable)

1. What is the purpose of the orientation session? What information is covered? Are other work-related application requirements explained during the orientation? What is the format for the orientation session?

2. Who conducts the orientation sessions? How long are they? Are they group or individual sessions? How often are they held?

3. How are orientations scheduled for applicants—i.e., are dates and times assigned or do applicants have some input into the scheduling process?

4. What is the process for tracking applicant participation in the orientation session? Approximately what proportion of applicants attends orientation sessions?

5. How much outreach is conducted to encourage attendance at the orientation sessions? Is there additional follow-up for applicants that do not attend the first scheduled orientation or subsequent sessions?

6. What is the required time frame for an applicant to attend an orientation session? For the average applicant, how much time is there between their initial visit to the welfare office and orientation?

E. Employability Plan Requirement (ask if applicable)

1. Are applicants required to complete the employability plan before being approved for assistance?

2. How are meetings to complete an employability plan scheduled? How many visits are required to complete the employability plan? Where is the plan completed?

3. How much outreach is conducted to encourage completion of an employability plan? Is there additional follow-up for applicants that do not complete an employability plan?

4. Who assists the applicant in preparing the employability plan? What is their background/training?

5. What information is collected to develop the plan? How is the plan developed? In what ways and how often is it modified?

6. How is the plan used by staff or customers? What follow-up activities occur after creation of the employability plan?

F. Job Search Application Requirement or Pre-TANF Job Search Program (ask if applicable)

1. What job search activities must an applicant/participant complete before their application is approved? Or as part of the pre-TANF job search program?

    - How is the job search requirement defined? Are applicants/participants required to contact a specific number of employers, spend a certain number of weeks looking for a job, attend job search classes or workshops?

    - What is the maximum/minimum amount of time the applicant/participant has to participate in job search activities? What is the average amount of time the typical customer spends in the activity?

    - Are these requirements the same for all applicants/participants? Explain.

    - How does the job search requirement/program differ from the job search requirement for TANF recipients?

2. How much outreach is conducted to encourage participation in job search activities? Is there additional follow-up for applicants/participants who do not participate in job search activities?

3. What resources are provided to assist applicants/participants with their job search?

- Are there computer labs? Phones, fax machines, copy machines, printers, and other office equipment? Does the program provide transportation assistance for job interviews? What resources are most useful for clients?

- When are the resources available? Where are they located? How often do applicants/participants use the resources? Is there a staff person available to assist applicants/participants in using the resources? Is there someone available to assist customers with the computers?

- How are these job search resources different from the resources available to TANF recipients?

- Who provides these resources?

4. Are job search classes or workshops provided for applicants/participants?

- If so, are the classes/workshops mandatory or voluntary? How many classes/workshops are required?

- What topics are covered in the classes? What is the format of the classes? How long are the classes?

- Who teaches the classes? Where are they provided?

- How often are classes provided?

- How many applicants attend a typical job search session?

- How do the job search classes differ from classes offered to TANF recipients?

5. Do applicants/participants receive one-on-one job search assistance?

- If so, who provides this assistance and where? How much time is typically spent with each applicant/participant? What type of assistance is requested by applicants/participants most often?

- Are applicants/participants provided with job leads?

6. Are incentives offered to the applicant/participant for finding work during the upfront (pre-TANF) period?

7. Is a case manager assigned to each applicant/participant during the period they are meeting the requirement or participating in the program? If so, what is the case manager's role? How much and what kind of contact does the case manager have with applicants/participants? What is the purpose of this contact? How many cases are assigned to each case manager?

8. Please describe the staffing structure for this initiative. Specifically:

- Who within the local office has responsibility for managing the job search requirement/program? Did the office hire new staff or rely on existing staff?

- What is the experience/background of staff involved? What other responsibilities does this person have?

- How much time do staff spend on the work-related application requirement/job search program?

- Have there been changes in staffing over time?

- What kind of training do staff connected to the requirement/activity receive?

9. To what extent do other staff not directly connected to the program have knowledge or information about the work-related application requirement/job search program to inform applicants/clients? What kind of training do they receive?

10. To what extent does the program/activity rely on staff from partner agencies? What are the responsibilities of these agencies?

G. Financial Assistance

1. Do applicants/participants receive financial assistance while participating in the job search requirement/program? (If office offers financial assistance but through lump-sum program, ask these questions as well)

- If yes, what is the purpose of providing this assistance?

- Are there conditions for receiving this assistance?

- How is cash assistance provided (e.g., cash, voucher, vendor payment)? Do case managers have discretion in deciding the form of assistance?

- Are there restrictions on how the assistance can be used? Do case managers have discretion in defining how the assistance can be used?

- How is the amount of financial assistance determined? Do case managers have discretion in deciding the amount of financial assistance or the length of its receipt? What is the maximum amount of time a family can receive assistance through the program? What is the maximum amount of financial assistance a family can receive? How does this amount differ from the amount they can receive under TANF?

- How often is the financial assistance provided to applicants/participants?

- Is this assistance treated as assistance or non-assistance? Why?

H. Other Forms of Assistance

1. Do applicants/participants receive any support services while completing the work-related application requirement/job search program? For example, a transportation stipend, food assistance, or other assistance? How are applicants informed of these services? How many applicants/participants utilize these services? How do these services compare to support services available through TANF? How are they funded?

2. Are applicants/participants participating in the work-related application requirement/job search program eligible for childcare assistance? How are applicants enrolled in childcare assistance? When does this assistance become available? How much

assistance is available? How does the assistance compare to the childcare assistance available through TANF? What proportion of applicants/participants utilize child care assistance?

3. What is the status of an applicant's/participant's food stamp application while completing the work-related application requirement/job search program? When is the food stamp application filed and approved? Is approval of the food stamp application dependent on completion of the requirements?

4. What is the status of an applicant's/participant's Medicaid application while completing the work-related application requirement/job search program? When is the Medicaid application filed and approved? Is approval of the Medicaid application dependent on completion of the requirements?

I. Requirement/Program Implications for TANF

For Work-Related Application Requirements (i.e., job search, orientation, or employability plan):

1. At what point is the application for TANF approved or denied based on the work-related application requirement (e.g., complete employability plan; after x months in pre-TANF activities; after complete x number of employer contacts)? What happens when an applicant finishes the work-related application requirement?

2. What are the consequences for applicants who do not complete each work-related application requirement? What happens to their current TANF application or their application for other services? What are the implications for their future TANF eligibility, time on TANF, and sanctions?

3. For Job Search Application Requirements: What happens to applicants who find a job during the job search requirement period? Are they transferred to a TANF work program? What assistance or supports are available for participants who find a job as a result of the job search requirement/program? Are these applicants eligible for earned income disregards? Are the earned income disregards for applicants different than those available for TANF recipients? If so, how do they differ?

For Pre-TANF Job Search Programs:

4. What is the maximum amount of time an individual can participate in the program?

5. How does participation in the program affect participants' eligibility for TANF or their time limit? Does financial assistance received during the job search program affect an applicant's eligibility for TANF cash benefits?

6. If still eligible for TANF, what triggers the participant's transfer to TANF (for example, exhausting their time in the program; successfully participating for x hours per week; obtaining employment)? Is this different for different types of participants? Describe.

7. If eligible for TANF, please describe the transfer process. Specifically, are participants required to reapply for TANF? If so, do they need to complete the entire application process? If not, how are participants transferred onto TANF?

8. What events trigger the exit of a participant from the pre-TANF job search program (without making them eligible for TANF)?

9. What are the consequences for applicants who do not complete the required activities of the program? What happens to their TANF application or their application for other services? What are the implications for their future TANF eligibility, time on TANF, and sanctions?

10. What happens to applicants who find a job during the program? Does the program provide assistance or supports for participants who find a job as a result of the job search requirement/program? How does this compare to the assistance and supports available for TANF clients who find jobs? Are these applicants eligible for earned income disregards? Are these applicants eligible for Transitional Medical Assistance or Transitional Food Stamp benefits (if offered by the state)? How does their eligibility for transitional benefits differ from the eligibility of TANF recipients?

11. Does the financial assistance received during the job search requirement/program count towards their TANF time limit?

J. Tracking Applicant/Participant and Program Outcomes

1. How are applicants/participants tracked during their participation in the work-related application requirement/job search program? Who is responsible for entering and tracking this information?

2. Are there any applicants/participants whose information is not entered into the data system (e.g., applicants/participants that do not complete the application process, applicants/participants that do not complete the job search requirement)?

3. Describe the data collected on TANF applicants/participants who do not end up receiving TANF. [collect any available reports]

4. How accessible are the data? How long have the data been collected?

5. What are the challenges associated with collecting these data?

6. How many families who start the TANF application process or enter the pre-TANF job search program do not continue? For what reasons? What are the characteristics of these families?

7. What are the employment outcomes for applicants/participants participating in the work-related application requirement/upfront job search program? What were the characteristics of applicants who obtained work during the work-related application requirement/job search program?

8. For Work-Related Application Requirements: What percentage of applicants enroll in TANF after completing the work-related application requirement? What percentage of applicants who do not meet the application requirement reapply to TANF at a later date?

9. For Pre-TANF Job Search Programs: What percentage of participants (a) finish the program, (b) find employment, (c) transfer onto TANF, (d) do not complete the program, or (e) reapply to TANF?

K. Successes, Challenges

1. Was the work-related application requirement/job search program implemented as expected? How did implementation differ from what was expected? Why?

2. Which aspects of the program/activity worked well and which aspects did not? Why?

3. What are the major challenges in implementing the program/activity? How were these challenges addressed?

4. To what extent is the work-related application requirement/job search program meeting its purpose/goals? What information/data is this assessment based on?

5. Are you satisfied with the numbers and outcomes of applicants participating in the work-related application requirement/job search program? Why or why not?

6. How has the program improved your ability to meet the TANF program changes resulting from DRA and the new federal regulations?

7. What, if any, unexpected positive or negative consequences resulted from the work-related application requirement/job search program? Explain.

8. What are the main lessons learned from your experience implementing the requirement/program? What lessons were learned regarding:

   - Eligibility/screening process
   - Stringency of penalties
   - Funding
   - Staffing
   - Orientation
   - Support services

9. What would you have done differently in implementing your applicant program or requirement? What advice would you give to another state or local office considering this type of program/requirement?

10. Is there a different approach you would like to see the state/office take with respect to diverting TANF applicants and/or preparing them for the work-participation requirements? Please describe.

IDENTIFYING PROMISING TANF DIVERSION PRACTICES STUDY

SITE VISIT GUIDE – LINE STAFF

Background:

What is your experience/background?

How much time do you spend on the work-related application requirement/job search program?

What other responsibilities do you have?

What kind of training do staff connected to the requirement/activity receive?

A. Goal/Purpose of Requirement/Program

1. What is the primary goal or purpose of the work-related application requirement/job search program? Have the goals of the requirement evolved or changed over time? If so, in what ways and why?

2. For office with multiple work-related application requirements: How do the different applicant requirements complement each other?

B. Development Process

1. What were the start up issues and challenges, if any?

2. What kinds of support did the local office receive from the state or other local offices in implementing the work-related application requirement/job search program? [e.g., rely on experiences of other local offices/states; receive resources from the state]

C. TANF Application Process

1. Please describe the sequence of steps in the TANF application process and the specific timing of required activities such as (a) attending an orientation, (b) completing an employability plan, or (c) conducting an upfront job search?

   Specifically:

   - What steps in the TANF/pre-TANF application process occur before and/or between each work-related application requirement, or before the job search program?

   - How much of the TANF/pre-TANF application is completed before the work-related application requirement/job search program?

- Is a determination of TANF/pre-TANF eligibility made before an applicant completes the work-related application requirement/job search program?

2. What is the typical amount of time between first entrance to the welfare office and each work-related requirement?

3. How do applicants first hear about the work-related application requirements, and from whom? What is the message conveyed to applicants regarding the work-related application requirements?

4. Are any applicants exempted from the requirement/program? How much discretion do program staff have in determining eligibility and granting exemptions from the requirement/program? What is the process for determining whether someone should be exempt from the requirement/program?

D. Orientation Requirement (ask if applicable)

1. What is the purpose of the orientation session? What information is covered? Are other work-related application requirements explained during the orientation? What is the format for the orientation session?

2. How long are the orientation sessions? Are they group or individual sessions? How often are they held?

3. How are orientations scheduled for applicants—i.e., are dates and times assigned or do applicants have some input into the scheduling process?

4. What is the process for tracking applicant participation in the orientation session? Approximately what proportion of applicants attends orientation sessions?

5. How much outreach is conducted to encourage attendance at the orientation sessions? Is there additional follow-up for applicants that do not attend the first scheduled orientation or subsequent sessions?

6. What is the required time frame for an applicant to attend an orientation session? For the average applicant, how much time is there between their initial visit to the welfare office and orientation?

E. Employability Plan Requirement

1. Are applicants required to complete the employability plan before being approved for assistance?

2. How are meetings to complete an employability plan scheduled? How many visits are required to complete the employability plan? Where is the plan completed?

3. How much outreach is conducted to encourage completion of an employability plan? Is there additional follow-up for applicants that do not complete an employability plan?

4. What is your role in preparing the employability plan?

5. What information is collected to develop the plan? How is the plan developed? In what ways and how often is it modified?

6. How is the plan used by staff or customers? What follow-up activities occur after creation of the employability plan?

F. Job Search Application Requirement or Pre-TANF Job Search Program

1. What job search activities must an applicant/participant complete before their application is approved? Or as part of the pre-TANF job search program?

   - How is the job search requirement defined? Are applicants/participants required to contact a specific number of employers, spend a certain number of weeks looking for a job, attend job search classes or workshops?

   - What is the maximum/minimum amount of time the applicant/participant has to participate in job search activities? What is the average amount of time the typical customer spends in the activity?

   - Are these requirements the same for all applicants/participants? Explain.

   - How does the job search requirement/program differ from the job search requirement for TANF recipients?

2. How are applicants/participants informed of the requirement/program? Is there an orientation session to inform applicants/participants of the requirement/program?

3. How much outreach is conducted to encourage participation in job search activities? Is there additional follow-up for applicants/participants who do not participate in job search activities?

4. What resources are provided to assist applicants/participants with their job search?

   - Are there computer labs? Phones, fax machines, copy machines, printers, and other office equipment? Does the program provide transportation assistance for job interviews? What resources are most useful for clients?

   - When are the resources available? Where are they located? How often do applicants/participants use the resources? Is there a staff person available to assist applicants/participants in using the resources? Is there someone available to assist customers with the computers?

   - How are these job search resources different from the resources available to TANF recipients?

   - Who provides these resources?

5. Are job search classes or workshops provided for applicants/participants?

   - If so, are the classes/workshops mandatory or voluntary? How many classes/workshops are required?

- What topics are covered in the classes? What is the format of the classes? How long are the classes?

- Who teaches the classes? Where are they provided?

- How often are classes provided?

- How many applicants attend a typical job search session?

- How do the job search classes differ from classes offered to TANF recipients?

6. Do applicants/participants receive one-on-one job search assistance?

- If so, who provides this assistance and where? How much time is typically spent with each applicant/participant? What type of assistance is requested by applicants/participants most often?

- Are applicants/participants provided with job leads?

7. Are incentives offered to the applicant/participant for finding work during the upfront (pre-TANF) period?

8. If a case manager: What is your role with applicant/participant? How much and what kind of contact do you have with applicants/participants? What is the purpose of this contact? How many cases are assigned to you?

G. Financial Assistance

1. Do applicants/participants receive financial assistance while participating in the job search requirement/program? (If office offers financial assistance but through lump-sum program, ask these questions as well)

- If yes, what are the conditions for receiving this assistance?

- Do case managers have discretion in deciding the form of assistance? Describe.

- Do case managers have discretion in defining how the assistance can be used? Describe.

- Do case managers have discretion in deciding the amount of financial assistance or the length of its receipt? Describe.

2. How often is the financial assistance provided to applicants/participants?

H. Other Forms of Assistance

1. Do applicants/participants receive any support services while completing the work-related application requirement/job search program? For example, a transportation stipend, food assistance, or other assistance? How are applicants informed of these services? How many applicants/participants utilize these services? How do these services compare to support services available through TANF? How are they funded?

2. Are applicants/participants participating in the work-related application requirement/job search program eligible for childcare assistance? How are applicants enrolled in childcare assistance? When does this assistance become available? How much assistance is available? How does the assistance compare to the childcare assistance available through TANF? What proportion of applicants/participants utilize child care assistance?

3. What is the status of an applicant's/participant's food stamp application while completing the work-related application requirement/job search program? When is the food stamp application filed and approved? Is approval of the food stamp application dependent on completion of the requirements?

4. What is the status of an applicant's/participant's Medicaid application while completing the work-related application requirement/job search program? When is the Medicaid application filed and approved? Is approval of the Medicaid application dependent on completion of the requirements?

I. Requirement/Program Implications for TANF

For Work-Related Application Requirements (i.e., job search, orientation, or employability plan):

1. At what point is the application for TANF approved or denied based on the work-related application requirement (e.g., complete employability plan; after x months in pre-TANF activities; after complete x number of employer contacts)? What happens when an applicant finishes the work-related application requirement?

2. What are the consequences for applicants who do not complete each work-related application requirement? What happens to their current TANF application or their application for other services? What are the implications for their future TANF eligibility, time on TANF, and sanctions?

3. For Job Search Application Requirements: What happens to applicants who find a job during the job search requirement period? Are they transferred to a TANF work program? What assistance or supports are available for participants who find a job as a result of the job search requirement/program? Are these applicants eligible for earned income disregards? Are the earned income disregards for applicants different than those available for TANF recipients? If so, how do they differ?

For Pre-TANF Job Search Programs:

4. How does participation in the program affect participants' eligibility for TANF or their time limit? Does financial assistance received during the job search program affect an applicant's eligibility for TANF cash benefits?

5. If still eligible for TANF, what triggers the participant's transfer to TANF (for example, exhausting their time in the program; successfully participating for x hours per week; obtaining employment)? Is this different for different types of participants? Describe.

6. If eligible for TANF, please describe the transfer process. Specifically, are participants required to reapply for TANF? If so, do they need to complete the entire application process? If not, how are participants transferred onto TANF?

7. What events trigger the exit of a participant from the pre-TANF job search program (without making them eligible for TANF)?

8. What are the consequences for applicants who do not complete the required activities of the program? What happens to their TANF application or their application for other services? What are the implications for their future TANF eligibility, time on TANF, and sanctions?

9. What happens to applicants who find a job during the program? Does the program provide assistance or supports for participants who find a job as a result of the job search requirement/program? How does this compare to the assistance and supports available for TANF clients who find jobs? Are these applicants eligible for earned income disregards? Are these applicants eligible for Transitional Medical Assistance or Transitional Food Stamp benefits (if offered by the state)? How does their eligibility for transitional benefits differ from the eligibility of TANF recipients?

J. Tracking Applicant/Participant and Program Outcomes

1. How are applicants/participants tracked during their participation in the work-related application requirement/job search program? Who is responsible for entering and tracking this information?

2. Are there any applicants/participants whose information is not entered into the data system (e.g., applicants/participants that do not complete the application process, applicants/participants that do not complete the job search requirement)?

3. What are the challenges associated with collecting the data on participants and nonparticipants?

4. How many families who start the TANF application process or enter the pre-TANF job search program do not continue? For what reasons? What are the characteristics of these families?

5. For Work-Related Application Requirements: What percentage of applicants enroll in TANF after completing the work-related application requirement? What percentage of applicants who do not meet the application requirement reapply to TANF at a later date?

6. For Pre-TANF Job Search Programs: What percentage of participants (a) finish the program, (b) find employment, (c) transfer onto TANF, (d) do not complete the program, or (e) reapply to TANF?

K. Successes, Challenges

1. Was the work-related application requirement/job search program implemented as you expected? How did implementation differ from what you expected? Why?

2. Which aspects of the program/activity worked well and which aspects did not? Why?

3. What are the major challenges in implementing the program/activity? How were these challenges addressed?

4. In your opinion, to what extent is the work-related application requirement/job search program meeting its purpose/goals? What information/data is this assessment based on?

5. Are you satisfied with the numbers and outcomes of applicants participating in the work-related application requirement/job search program? Why or why not?

6. What, if any, unexpected positive or negative consequences resulted from the work-related application requirement/job search program? Explain.

7. What are the main lessons learned from your experience implementing the requirement/program? What lessons were learned regarding:

   - Eligibility/screening process
   - Stringency of penalties
   - Funding
   - Staffing
   - Orientation
   - Support services

8. What advice would you give to another state or local office considering this type of program/requirement?

9. Are there new programs or approaches being considered by the state [local office]? Please describe.

10. Is there a different approach you would like to see the state/office take with respect to diverting TANF applicants and/or preparing them for the work-participation requirements? Please describe.

IDENTIFYING PROMISING TANF DIVERSION PRACTICES STUDY

SITE VISIT GUIDE – PARTNER ORGANIZATION

A. Goal/Purpose

1. What is the primary goal or purpose of the work-related application requirement/job search program? Have the goals of the requirement evolved or changed over time? If so, in what ways and why?

B. Development Process

1. When did you first provide services as part of the work-related application requirement/job search program?

2. What were the start up issues and challenges, if any?

3. What was your organization's role in developing the work-related application requirement/job search program?

4. What funds are used to support and implement the work-related application requirement/job search program [federal, state MOE, or separate state funds]?

5. How much funding is currently allocated to your organization for the work-related application requirement/job search program? How long is the funding period?

6. What kinds of support did your organization receive from the local office, the state, or other local offices in implementing the work-related application requirement/job search program? [e.g., rely on experiences of other local offices/states; receive resources from the state]

7. How much discretion does your organization have in implementing the work-related application requirement/job search program? Does your organization have discretion over any of the following:

   - Eligibility requirements
   - Screening process
   - Selecting partners
   - Determining types of job search assistance or services

C. Orientation Requirement (ask if the organization is involved in this requirement)

1. What is the purpose of the orientation session? What information is covered? Are other work-related application requirements explained during the orientation? What is the format for the orientation session?

2. Who conducts the orientation sessions? How long are they? Are they group or individual sessions? How often are they held?

3. How are orientations scheduled for applicants—i.e., are dates and times assigned or do applicants have some input into the scheduling process?

4. What is the process for tracking applicant participation in the orientation session? Approximately what proportion of applicants attends orientation sessions?

5. How much outreach is conducted to encourage attendance at the orientation sessions? Is there additional follow-up for applicants that do not attend the first scheduled orientation or subsequent sessions?

6. What is the required time frame for an applicant to attend an orientation session? For the average applicant, how much time is there between their initial visit to the welfare office and orientation?

D. Employability Plan Requirement (ask if the organization is involved in this requirement)

1. Are applicants required to complete the employability plan before being approved for assistance?

2. How are meetings to complete an employability plan scheduled? How many visits are required to complete the employability plan? Where is the plan completed?

3. How much outreach is conducted to encourage completion of an employability plan? Is there additional follow-up for applicants that do not complete an employability plan?

4. Who assists the applicant in preparing the employability plan? What is their background/training?

5. What information is collected to develop the plan? How is the plan developed? In what ways and how often is it modified?

6. How is the plan used by staff or customers? What follow-up activities occur after creation of the employability plan?

E. Job Search Application Requirement or Pre-TANF Job Search Program (ask if the organization is involved in this requirement)

1. What job search activities must an applicant/participant complete before their application is approved? Or as part of the pre-TANF job search program?

   - How is the job search requirement defined? Are applicants/participants required to contact a specific number of employers, spend a certain number of weeks looking for a job, attend job search classes or workshops?

   - What is the maximum/minimum amount of time the applicant/participant has to participate in job search activities? What is the average amount of time the typical customer spends in the activity?

- Are these requirements the same for all applicants/participants? Explain.

- How does the job search requirement/program differ from the job search requirement for TANF recipients?

2. How are applicants/participants informed of the requirement/program? Is there an orientation session to inform applicants/participants of the requirement/program?

3. How much outreach is conducted to encourage participation in job search activities? Is there additional follow-up for applicants/participants who do not participate in job search activities?

4. What resources are provided to assist applicants/participants with their job search?

- Are there computer labs? Phones, fax machines, copy machines, printers, and other office equipment? Does the program provide transportation assistance for job interviews? What resources are most useful for clients?

- When are the resources available? Where are they located? How often do applicants/participants use the resources? Is there a staff person available to assist applicants/participants in using the resources? Is there someone available to assist customers with the computers?

- How are these job search resources different from the resources available to TANF recipients?

- Who provides these resources?

5. Are job search classes or workshops provided for applicants/participants?

- If so, are the classes/workshops mandatory or voluntary? How many classes/workshops are required?

- What topics are covered in the classes? What is the format of the classes? How long are the classes?

- Who teaches the classes? Where are they provided?

- How often are classes provided?

- How many applicants attend a typical job search session?

- How do the job search classes differ from classes offered to TANF recipients?

6. Do applicants/participants receive one-on-one job search assistance?

- If so, who provides this assistance and where? How much time is typically spent with each applicant/participant? What type of assistance is requested by applicants/participants most often?

- Are applicants/participants provided with job leads?

7. Are incentives offered to the applicant/participant for finding work during the upfront (pre-TANF) period?

8. Is a case manager assigned to each applicant/participant during the period they are meeting the requirement or participating in the program? If so, what is the case manager's role? How much and what kind of contact does the case manager have with applicants/participants? What is the purpose of this contact? How many cases are assigned to each case manager?

9. Please describe the staffing structure for this initiative. Specifically:

    - What is the experience/background of staff involved? What other responsibilities does this person have?

    - How much time do staff spend on the work-related application requirement/job search program?

    - Have there been changes in staffing over time?

    - What kind of training do staff connected to the requirement/activity receive?

10. To what extent do other staff not directly connected to the program have knowledge or information about the work-related application requirement/job search program to inform applicants/clients? What kind of training do they receive?

11. To what extent does the program/activity rely on staff from partner agencies? What are the responsibilities of these agencies?

F. Financial Assistance (ask if the organization is involved in providing this assistance)

1. Do applicants/participants receive financial assistance while participating in the job search requirement/program? (If office offers financial assistance but through lump-sum program, ask these questions as well)

    - If yes, what is the purpose of providing this assistance?

    - Are there conditions for receiving this assistance?

    - How is cash assistance provided (e.g., cash, voucher, vendor payment)? Do case managers have discretion in deciding the form of assistance?

    - Are there restrictions on how the assistance can be used? Do case managers have discretion in defining how the assistance can be used?

    - How is the amount of financial assistance determined? Do case managers have discretion in deciding the amount of financial assistance or the length of its receipt? What is the maximum amount of time a family can receive assistance through the program? What is the maximum amount of financial assistance a family can receive? How does this amount differ from the amount they can receive under TANF?

    - How often is the financial assistance provided to applicants/participants?

    - Is this assistance treated as assistance or non-assistance? Why?

G. Other Forms of Assistance (ask if the organization is involved in this requirement)

1. Do applicants/participants receive any support services while completing the work-related application requirement/job search program? For example, a transportation stipend, food assistance, or other assistance? What is your organization's role in providing these services?

2. Are applicants/participants participating in the work-related application requirement/job search program eligible for childcare assistance? What is your organization's role in providing these services?

H. Tracking Applicant/Participant and Program Outcomes

1. How are applicants/participants tracked during their participation in the work-related application requirement/job search program? Who is responsible for entering and tracking this information?

2. Are there any applicants/participants whose information is not entered into the data system (e.g., applicants/participants that do not complete the application process, applicants/participants that do not complete the job search requirement)?

3. Describe the data your organization collects on TANF applicants/participants who do not end up receiving TANF. [collect any available reports]

   - What demographic data are collected?

   - Is there information on the services provided to these participants?

   - What information is collected on participant outcomes, including employment and TANF receipt?

   - Is it possible to determine whether a participant reapplied for TANF or received TANF benefits after participation in the program/activity?

   - What information is available on employment, including type of employment, wages, or hours for this population?

4. How are the data used? To determine eligibility for later TANF eligibility? To monitor program outcomes?

5. What are the challenges associated with collecting this data?

6. How many families who start the TANF application process or enter the pre-TANF job search program do not continue? For what reasons? What are the characteristics of these families?

7. What are the employment outcomes for applicants/participants participating in the work-related application requirement/upfront job search program? What were the characteristics of applicants who obtained work during the work-related application requirement/job search program?

8. For Work-Related Application Requirements: What percentage of applicants enroll in TANF after completing the work-related application requirement? What percentage of applicants who do not meet the application requirement reapply to TANF at a later date?

9. For Pre-TANF Job Search Programs: What percentage of participants (a) finish the program, (b) find employment, (c) transfer onto TANF, (d) do not complete the program, or (e) reapply to TANF?

I.   Successes, Challenges

1. Was the work-related application requirement/job search program implemented as expected? How did implementation differ from what was expected? Why?

2. Which aspects of the program/activity worked well and which aspects did not? Why?

3. What are the major challenges in implementing the program/activity? How were these challenges addressed?

4. To what extent is the work-related application requirement/job search program meeting its purpose/goals? What information/data is this assessment based on?

5. Are you satisfied with the numbers and outcomes of applicants participating in the work-related application requirement/job search program? Why or why not?

6. What, if any, unexpected positive or negative consequences resulted from the work-related application requirement/job search program? Explain.

7. What are the main lessons learned from your experience implementing the requirement/program? What lessons were learned regarding:

   - Eligibility/screening process
   - Stringency of penalties
   - Funding
   - Staffing
   - Orientation
   - Support services

8. What would you have done differently in implementing the applicant program or requirement? What advice would you give to another state or local office considering this type of program/requirement?

9. Is there a different approach you would like to see the state/office take with respect to diverting TANF applicants and/or preparing them for the work-participation requirements? Please describe.

APPENDIX D

PUBLIC COMMENTS AND RESPONSES

STATE OF ARIZONA COMMENTS ON PROPOSED DATA COLLECTION

The department specifically requests comment on:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility.

Comment (a): Arizona believes that the collection of information, while not necessary, is important because the ability to review the policy and procedures of other States and the sharing of "Best Practices" could enhance the performance of the TANF Diversion Programs in Arizona and in other States as well.

(b) The accuracy of the agency's estimate of the burden of the proposed collection of information.

Comment (b): After considering the information provided in this Federal Register in regard to the surveys, interviews and visits to the local offices, Arizona believes that the estimated burden is a reasonable estimate of total burden hours.

(c) The quality, utility, and clarity of the information to be collected.

Comment (c): Arizona believes that surveys and interviews, coupled with the information gathered by visits to the local offices should yield the quality of the information that would be necessary to give good purpose to this study. The information collected should bring a better understanding of local diversion practices and procedures and provide clear direction for improving the application of diversion programs.

(d) Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.

Comment (d): While the surveys, interviews and local office visits will be necessary an advanced communication to the local offices and the directors, with the details of the specific information to be collected, would afford them the ability to gather the information accurately and prepare for the surveys and interviews.

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Fifth District

January 16, 2007

Administration for Children and Families
Office of Administration
Office of Information Services
370 L'Enfant Promenade, SW
Washington, DC 20447

Attention: ACF Reports Clearance Officer

Dear Sir/Madame:

Thank you for the opportunity to respond to the November 16, 2006, Federal Register publication requesting comments on *Identifying Promising Temporary Assistance for Needy Families (TANF) Diversion Practices.* Attached are our comments on the request for information.

If you have any questions, you may contact me at (562) 908-8517, or your staff may contact Beverly Stevens at (562) 908-8530. Thank you again for the opportunity to participate in the review process.

Sincerely,

Bill Taylor

Bill Taylor,
Director of Intergovernmental Relations

BT:bjs

Attachment

COMMENTS ON FEDERAL REGISTER

NOVEMBER 16, 2006- REQUEST FOR INFORMATION – IDENTIFYING PROMISING TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) DIVERSION PRACTICES STUDY

Requested Information

Question **(a)**:	Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether information shall have practical utility;
Response:	The proposed data collection effort is necessary to assess the operation of diversion programs administered by states and will have practical utility if researchers provide a replicable analysis and strong intercoder agreement in qualitative data analysis.
Question **(b)**:	the accuracy of the agency's burden of the purposed collection of information;
Response:	Based on our Department's experience working with researchers, using open-ended questions with multiple respondents, the burden on agencies is generally understated. What is missing from estimates is the amount of time it takes for staff to gather background information and prepare responses in advance of the interview. It is likely that a team must be assembled to address issues raised by research questions because policies and practices are distributed across people and programs. The presence of existing documentation on recent policy decisions, program goals and outcomes will determine the burden of staff needed to prepare responses.
Question **(c)**:	the quality, utility and clarity of this information to be collected; and
Response:	Consideration should be given to revising questions to include questions which are close-ended and those which provide multiple choice selections.
Question **(d)**:	ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other information technology.
Response:	We recommend that survey questions be sent via electronic mail, (e-mail) to staff at or above the middle management level. This will allow agencies to submit written responses to each question. Additionally, Department Directors will be able to scrutinize the wording of responses. The e-mail process will eliminate the need for interviewers to translate responses and reduce the possibility of misinterpretation of answers. Additionally, interviews can be audio-recorded to reduce the cost of a transcription service.
	Finally, the submission of a separate text file in response to each question could facilitate qualitative data analysis using one of many software options available.

RESPONSES TO COMMENTS FROM LA COUNTY

Question (a)
N/A

Question (b)
During the pretest conducted in December 2006, respondents reported completing the mail questionnaire in an average of 20 minutes. We have revised the burden estimates to reflect the additional minutes The telephone interviews with pretest states averaged about 60 minutes.

Question (c)

As a result of the pretest in December 2006, we revised the telephone interview protocol to minimize the burden on respondents. We also revised the questionnaire and interview protocol to improve the clarity of questions.

Question (d)

Following the pretest, we clarified questions in the mail questionnaire and telephone interview protocol to improve respondents' understanding of the questions. We are also requesting documentation on state policies and procedures prior to the telephone interview. This should enable us to complete the interviews more quickly and ensure the accuracy of state applicant employment and diversion strategies. We will enter all the information collected from the mail questionnaire and telephone interviews into spreadsheets to compare policies across states and to summarize the information.

We plan to conduct the interviews by telephone rather than by collecting responses through e-mail to engage the respondents in conversations about their applicant diversion and employment strategies. To the extent possible, we have included close-ended questions in the interview protocol.