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SUPPORTING STATEMENT FOR OMB CLEARANCE: PART A

DHHS/ACF SUPPORTING HEALTHY MARRIAGE (SHM) PROJECT EVALUATION

LOW-INCOME MARRIED COUPLES DATA COLLECTION ACTIVITIES – CONTROL SERVICES SURVEY

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TABLE OF CONTENTS

A. .	JUSTIFICATION	3
Д1	Circumstances Necessitating Data Collection	
7 1 1 .	A1.1 Overview of the SHM Evaluation	
Δ2	How, By Whom and For What Purpose Are Data to be Used	
714.	A2.1 The Role of the SHM Control Services Survey	
	A2.2 Contents of the Control Services Survey	
A3.	Use of Information Technology for Data Collection to Reduce Respondent Bu	rden7
	Efforts to Identify Duplication	
A5.	Burden on Small Business	7
A6.	Consequences to Federal Program or Policy Activities if the Collection of Information is not Conducted or is Conducted Less Frequently	7
Δ7	Special Data Collection Circumstances	
117.	Special Data Concetion Circumstances	
A8.	Form 5 CFR 1320.8(d) and Consultations Prior to OMB Submission	8
A9.	Justification for Respondent Payments	9
A10). Confidentiality	10
	A10.1 Confidentiality and the Control Services Survey	11
A11	1. Questions of a Sensitive Nature	12
A12	2. Estimates of the Hour Burden of Data Collection to Respondents	12
	A12.1 Estimates of the Cost Burden of Data Collection to Respondents	
A13	3. Estimates of Capital, Operating, and Start-Up Costs to Respondents	
	and Record-Keepers	13
	1. Estimates of Cost to Federal Government	
A15	5. Changes in Burden	14
A16	5. Tabulation, Analysis, and Publication Plans and Schedule	14
A17	7. Reasons for Not Displaying the OMB Approval Expiration Date	14
A18	3. Exceptions to Certification Statement	14

B. COLLECTION OF INFORMATION USING STATISTICAL METHODS	15
B1. Sampling and Analysis	15
B2. Procedures for Collection of Information	15
B2.1 Procedures for the Control Services Data Collection	16
B3. Maximizing Response Rates	16
B4. Pre-Testing	17
B5. Consultants on Statistical Aspects of the Design	17
List of Exhibits	
A1-1 Major Research Questions in the SHM Evaluation	4
A12-1 Annual Estimated Burden Hours of the SHM Control Services Survey	13
List of Attachments	
A: Control Services Survey Instrument	18
B: Federal Register Notices	38
C: Letter to Potential Survey Respondents	
D: Informed Consent Agreement for SHM baseline collection	44

A. JUSTIFICATION

A1. <u>Circumstances Necessitating Data Collection</u>

Recent declines in marriage in the United States have had disproportionate effects on poor children. Increasing numbers of children are born to poor unmarried parents, and children of poor married parents are twice as likely as children of affluent married parents to experience their parents' break-up. The accumulating evidence points to markedly better outcomes when children are raised by married parents and suggests that these differences partly are due to marriage's effects on the income, relationships, and quality of parenting available to children.

For these reasons, as the federal government and state governments develop new programs and policies to inform provisions in the 1996 TANF legislation to support the formation and maintenance of two-parent families, there is great interest in preventive strategies aimed at improving the quality and duration of marital relationships. Thus, in 2001 the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services launched its Healthy Marriage Initiative.

The ACF initiative seeks to "help couples who choose marriage for themselves access services that will help them develop the skills and knowledge to form and sustain healthy marriages." These services will center on research-based marriage education curricula developed by experts in the field. Prior to the ACF initiative, these services were primarily available to middle- and upper-class couples, and formal evaluation of these programs was limited to a series of small-sample studies. This initiative emphasizes broadening access to low-income populations while ensuring that the services are accompanied by referrals to other supports that families may need in order to participate and to sustain healthy marital relationships. It also includes a rigorous evaluation agenda.

The Supporting Healthy Marriage (SHM) Demonstration is the first large-scale, multi-site test of marriage education programs for low-income married couples.¹ It offers a tremendous opportunity to build knowledge on how to support healthy marriages. The study design is based upon random assignment, the strongest known method for assessing program effects. The multi-site structure provides flexibility to assess a variety of approaches to marriage education over a long follow-up period. This well-designed study will illuminate the determinants of healthy marriages, and any tests that improve marital outcomes will provide important information about the causal links between such improvements and outcomes for children, adults, and families.

¹ The Building Strong Families (BSF) project is another multi-site random assignment evaluation funded by the Administration for Children and Families in 2002 as part of the Healthy Marriage Initiative. BSF is an initiative to develop and evaluate programs designed to help interested unwed parents achieve their aspirations for healthy marriage and a stable family life.

A1.1 Overview of the SHM Evaluation

The SHM evaluation, which began in September 2003, builds on the evidence described in the previous section. It is the first large-scale, multi-year, multi-site rigorous test of marriage education programs for low-income married couples. It is designed to inform program operators and policymakers of the most effective ways to help couples strengthen and maintain healthy marriages. Exhibit A1-1 lists the major research questions addressed in the evaluation, which will be presented through a mix of site-specific reports and cross-cutting documents summarizing results and lessons across the sites.

Exhibit A1-1

Major Research Questions in the SHM Evaluation

- 1. How effective is marriage education for low-income married couples and what outcomes does it affect? Marriage education has shown some positive effects on middle class couples in improving relationship quality. Can similar positive effects be found for low-income married couples? Can marriage education increase marital stability and improve child well-being as well?
- 2. **Who benefits the most and least from marriage education?** Low-income married couples are a diverse group. An important question for SHM is whether marriage education works better for some groups than for others. For example, does it have different effects for couples about to have their first child or those whose oldest child is about to become a teenager?
- 3. Why do some marriage education programs work better than others? Because SHM deals with a relatively new type of social intervention, implementation research holds the promise of being able to identify best practices. The project will describe each site's goals and service models; the start-up challenges sites faced; and early lessons on designing marriage skills programs, securing program funding, building interagency partnerships, identifying and recruiting couples, and encouraging participation.

MDRC and its subcontractors are working with eight pilot sites around the country to implement and test SHM programs. The SHM project includes the following sites:

- The University of Central Florida, Orlando, FL
- Catholic Charities, Wichita, KS
- University Behavioral Associates, Bronx, NY
- Public Strategies, Oklahoma City, OK
- Community Prevention Partnership, Reading, PA
- Texas Health and Human Services Commission, Austin, TX
- Becoming Parents Program, Seattle, WA
- Center for Human Services, Shoreline, WA

We will work intensively with each site to develop, refine, and pilot test its proposed demonstration project and to put in place the random assignment and data collection protocols

necessary to implement the evaluation. In each site, once the program to be tested has been designed in detail, MDRC's team² will support the staff training and start-up process and conduct an assessment during a pilot period. This will ensure that the model is being operated as planned and that the flow of clients through the program is consistent with both program and evaluation requirements. After each site completes a six-month pilot, the research team will also conduct a brief survey to examine the differential between service received by the control group and the program group. ACF is currently seeking OMB approval for this data collection. the pilot phase, participants are randomly assigned to research groups to allow the research team to monitor the assignment process. The projects will collect baseline information from couples in the program group and the control group (OMB No. 0970-0299) to help describe the population being served, to assess the validity of random assignment, and to define key sub-groups for later analyses. As a result of the pilot experience, projects will refine their program model to reflect any lessons learned and will then begin to assign couples to the actual research sample groups. (In places where random assignment has worked very well during the pilot period and where little program refinement is required, couples randomly assigned during the pilot period may remain in the permanent research groups for the study.)

MDRC will continually monitor the demonstration programs and examine any research design challenges to develop recommendations to strengthen the programs. Follow-up surveys at the 12-, and 36 month points will be used to evaluate program impacts. These surveys will include respondents from among the couples who participate in the program as well as couples in the control group. During the 12-month follow-up, MDRC will also conduct an observational study of couple interactions and parent-child interactions. Assessments of child outcomes will be included in the 36- month survey. Justifications for information collection associated with these activities will be provided at the appropriate time.

The next section provides more detail on the control services survey currently requiring OMB approval, as well as the role that the resulting data will play in the SHM evaluation. The proposed control services survey instrument is included in Attachment A.

A2. How, By Whom, and For What Purpose Are Data to be Used

This document requests OMB clearance for activities related to the control services survey developed as part of the SHM evaluation. The information gathered in the control services survey will be used to describe how many couples in the control group received marriage education and other support services, in comparison with couples in the program group. We will also use the data to describe participation in SHM services among program group members. These data will thus help us understand the differential in service receipt between the two research groups. The SHM evaluation team consists of MDRC and its partners, Abt Associates, Child Trends, Optimal Solutions Group, and McFarland and Associates. We will administer this data collection to all participants in the SHM pilot in each site, but will not administer it to participants enrolled in the evaluation research sample after the pilot period ends unless we are unable to locate a sufficient number of respondents from the pilot sample.

² MDRC is the lead evaluative organization conducting the SHM project. It is joined by a team of subcontractors including Abt Associates, Child Trends, Optimal Solutions Group, and McFarland Associates.

A2.1 The Role of the SHM Control Services Survey

In order to conduct a fair test of the SHM program, the research team must be sure that similar kinds of marriage education services are not readily accessible to control group members elsewhere in the community. This is particularly important given the large number of healthy marriage grants recently made by the Administration for Children and Families, including some in the same areas as our emerging sites. Abt Associates, as part of the SHM research team, will conduct a brief survey with pilot sample members to assess the service receipt differential between the program and control groups.

Each of the participants in the SHM pilot study will be contacted by Abt Associates about three to six months after they are enrolled in the pilot to complete a brief survey over the phone. We may also contact some participants in the full evaluation if the pilot sample is not large enough. The purpose of this survey is to identify the kinds of services that participants have received since random assignment, either from the SHM program or from other agencies in the community. This will be combined with data from the program MIS about the services that program group members received from a site's SHM program. This will allow the research team to determine whether there is a sufficient differential between the services received by the program and control group to constitute a fair test of the SHM intervention, and to provide technical assistance to sites to help strengthen the differential between the program and control groups in sites in which the control group is receiving substantial services.

If our analysis of these data indicate that a substantial proportion of the control group is receiving services in the community that are very similar to those that the program group is receiving from SHM, MDRC and ACF may elect not to include an emerging site from the pilot into the full evaluation or may remove a site from the full evaluation. We do not anticipate this outcome, given the types of services that have been documented to date in the geographic areas served by our sites. Instead, we are likely to use the information to provide technical assistance to help sites to strengthen the differential if needed.

A2.2 Contents of the Control Services Survey

The control services survey is intended to be quite brief and in pre-tests, took only about five minutes to administer. Because the pre-test respondents received very few marriage education or counseling services outside of SHM, we anticipate that the survey could take up to 15 minutes, depending on the kinds of services that a respondent received since enrolling in the study. For the purpose of this submission, we estimate that the average respondent burden will be about 10 minutes. The survey will ask questions about the following five modules:

- *Participation in marriage education services*, including the length of services, whether it was in a group setting, whether the participant attended these services with their spouse, and the name of the program.
- *Participation in other marriage services*, such as counseling or therapy. This will also include questions about the length of services, whether the participant attended these services with their spouse, and the name of the agency or program.
- *Participation in other intensive parenting or home visiting services*. This will include questions about the name of the agency or program and the intensity of services.

- *Reasons for non-attendance*. Members of the program group will be asked how many of their assigned marriage education workshops they attended. If they answer "None" or "Some", they will be asked to identify the reasons they did not attend from a list.
- *Update contact information*. Respondents will be asked to update their contact information so that the research team can send the respondent's payment to the correct address. Also, in cases where respondents remain in the study sample, the survey staff will need to be able to reach them for later follow-up surveys.

A3. Use of Information Technology for Data Collection to Reduce Respondent Burden

The use of improved technology has been incorporated into the data collection design wherever possible in order to reduce respondent burden. Interviewers will administer the control services survey using a Computer-Assisted Telephone Interview (CATI) system. Computer-administered surveys reduce burden by skipping inappropriate and non-applicable questions, thus facilitating a more streamlined survey administration. For example, respondents who are in the control group will not be prompted to answer questions about their attendance at SHM program services. This technology will allow for an easier and quicker survey process and will be implemented in all sites.

A4. Efforts to Identify Duplication

The SHM control services survey will collect information about particular kinds of services that may be accessed by the specific individuals who will be participating in the SHM study. Because we need to ask these questions of both the control group members and the program group members and because we are asking about services that may not be provided by the SHM program, this information is not readily available in other program records, nor does any other research duplicate this information for the specific individuals who will participate in the SHM evaluation.

A5. Burden on Small Business

Does not apply. All respondents are individuals.

A6. <u>Consequences to Federal Program or Policy Activities if the Collection of Information is not Conducted or is Conducted Less Frequently</u>

Without collecting the information in the control services survey, the SHM research team will be unable to assess whether there is a sufficient differential in the services received by the SHM program group and the SHM control group to provide a fair test of the SHM program model. If the control group in the SHM study receives similar services to those provided by the SHM program it will be impossible to determine the real impacts of the SHM program. The control services survey will allow the research team to understand the service differential near the time that each site begins to enroll participants in the SHM study. If necessary, we would be able to implement measures to increase the intensity of the SHM program model, identify different recruitment sources, or decide not to move a site forward into the full evaluation.

In sum, without the control services survey, we will be unable to conduct the fairest and most accurate evaluation of marriage education programs. Program operators and policy-makers interested in providing marriage education to low-income couples would be left with less information about the best strategies to target different groups and less certainty about marriage education's overall effectiveness as an intervention.

A7. Special Data Collection Circumstances

No such circumstances.

A8. Form 5 CFR 1320.8(d) and Consultations Prior to OMB Submission

The 60-day Federal Register notice soliciting comments for the SHM baseline data collection was published in the Federal Register, Volume 72, Number 82, page 21266 on April 30, 2007. The 30-day Federal Register notice was published in the Federal Register, Volume 72, Number 131, page 37534 on July 10, 2007. A copy of the published 60-day Federal Register notice and the published 30-day Federal Register notice are located in Attachment B. ACF/HHS received two comments resulting from the published 30-day Federal Register notice. One comment was a request for a copy of the draft survey instrument, which MDRC provided. The second comment questioned the value of conducting research on healthy marriage, but did not provide any specific comments or questions about the proposed data collection. Therefore, we have not made any resulting changes to the survey instrument or data collection plans.

Although this survey represents efforts to break new ground in assessing programs specifically designed to assist the low-income married population, it builds on previous survey research. We have consequently developed instruments that incorporate items from other major studies. Many of the questions in the SHM control services survey are based on program participation items included in the 15-month follow-up survey for the Building Strong Families (BSF) project (OMB No. 0970-0304), which is being conducted by Mathematica Policy Research. These questions have been adapted to meet the specific needs of the SHM project and its focus on married couples. BSF is focused on romantically involved, unwed new or expectant parents.

Surveys previously fielded by MDRC about the receipt of social services also provided a natural starting place for the development of this instrument. However, because the emerging SHM interventions enter a field in which there is very little prior research, both at MDRC and in the broader research community, many items selected for inclusion have been developed for the specific purpose of this instrument. Some questions were included exactly as they were asked in previous surveys, while others were modified to reflect the goals of the SHM project as fully as possible, and also to reflect the population's low literacy and comprehension skills.

The key instruments that were used in the development of the control services survey questions are as follows:

- MDRC surveys, including those used in the following projects: the Employment Retention and Advancement (ERA) project (OMB No. 0970-0242 and OMB No. 0970-0265); the Enhanced Services for the Hard-to-Employ (HtE) project (OMB No. 233-01-0012); and the Work Advancement and Support Center project (private foundation – funded survey);
- The 15-month follow-up survey instrument, developed by Mathematica Policy Research for the Building Strong Families project (OMB No. 0970-0304); and
- The Oklahoma Baseline Statewide Survey on Marriage and Divorce, a state-wide survey designed to measure aspects of family and marital life, as well as prior participation in marriage education services.

In the course of developing the control services survey instrument, MDRC also drew on the internal expertise of Dr. Charles Michalopoulos, Dr. Virginia Knox, Dr. JoAnn Hsueh, and Jo Anna Hunter, each of whom have been involved with developing surveys and impact analysis at MDRC for numerous projects.

A9. Justification for Respondent Payments

We are aiming to achieve an 80 percent completion rate for the control services survey. This survey has some unique aspects that make administration difficult and threaten response rates. We are therefore requesting clearance to offer a monetary incentive to those who complete the control services survey. Aspects of the survey effort that may make it more difficult to obtain high completion rates are:

- The surveys include questions that could be perceived as somewhat intrusive and therefore could make respondents reluctant to participate (i.e., questions about participation in marriage education services, therapy or counseling, all of which could be perceived as placing a stigma on participants).
- Other difficulties in administering the control service survey come from the population itself. Educational and economically disadvantaged groups, such as those in the SHM pilot sample, have been found to be more difficult than the general population to convince to participate in surveys.

These difficulties interact to make this survey of SHM pilot sample members more difficult to conduct than surveys of the general population. In addition, the pilot sample for each SHM site is very small. We plan to administer the control services survey to between 86 and 174 respondents in each site, depending on the size of that site's SHM pilot. Consequently, it is especially important that we obtain completion rates high enough that they allow us to draw conclusions from this data. Furthermore, because the results of this survey will be used to make decisions about individual sites, we will need to obtain sufficient respondents in each site, not merely from the overall SHM pilot sample.

Thus, we are requesting clearance to use respondent payments for those who complete the

control services survey to obtain completion rates that will yield credible results, to avoid the bias that could result from selective non-response, and to reduce item non-response. In addition, providing an incentive for the control services survey will also increase the likelihood that these sample members will respond to later follow-up surveys because sample members who receive monetary incentives for completing a past survey are more likely to respond to subsequent surveys (Singer, et al., 1998). We believe that MDRC's previous experiences with surveys of welfare recipients and other disadvantaged populations make a strong case for the use of gifts and respondent payments for completing the SHM control services survey.

To be effective, the amount of the incentives must fit the burden of the survey. We have based the amount to be paid to SHM respondents on prior research, and MDRC's prior experience with similar populations. We propose a \$10 incentive for each member of the couple who completes the SHM control services survey.

A10. Confidentiality

Each potential participant in the SHM control services survey will have been read the agreement to take part in the SHM study when they enrolled in SHM (see Attachment D for the entire informed consent form - OMB Control Number: 0970-0299). This statement will explain the study and will assure them of their privacy and rights as respondents. Specifically, the reference to confidentiality reads:

If you agree to be in the study, researchers will collect information about you and your children.

The information you share with the study team is important. It could help make these services available to other couples like you. At the start of the study, you and your spouse will be asked to answer some questions in private. These questions will ask you how well you get along with your spouse, how happy or sad you are, and what makes you upset.

If you agree to be in the study, you and your spouse will be interviewed one or more times over the next seven years by a survey company called Abt Associates. Abt Associates is part of the research team for this study. You will be asked about your marriage, how well you are getting along with your spouse, your experiences with [Local program], and your children. You might also be asked to let us do some activities with your children. You do not have to answer any question that you don't want to answer. You will get [gift amount] for each interview.

If you agree to be in the study, [Local Program] program will share information with the research team about the services you get over the next five years as well. We might also collect data from [State] about things like your wages and benefits. We might also collect data from [State] about services your children get, and your children's school test scores.

Taking part in the study is your choice. You may stop being in the study at any time. If you stop being in the study, we will use any information that we have collected before then.

Your Answers Will Be Kept Private

Only the study staff will be able to see information you give them. Your name will never appear in any public document. All the study staff is trained to protect privacy. Information gathered from [State] about you or your children will be marked with a code number, not names. We also have a Confidentiality Certificate (CC) from the US government that adds special protection for the research information about you. It says we do not have to identify you, even under a court order or subpoena. Still, if keeping your answers private would put you, someone else or your child in serious danger, then we will have to tell government agencies to protect you or the other person. And, the government may see your information if it audits us.

At the outset of the control services, survey, respondents will be reminded that they can refuse to answer the questions, their answers will be kept confidential, and that their agreement or refusal to participate will not affect their participation in the study or the ability to get services now or in the future.

The SHM Confidentiality Certificate from the National Institute on Alcohol Abuse and Alcoholism authorizes anyone connected with any information collections that are part of the SHM project to withhold the identity of subjects of the research. The Confidentiality Certificate protects the privacy of all research data gathered by researchers from MDRC, its subcontractors and cooperating agencies, and anyone else who may come into contact with research information about SHM study participants.

A10.1 Confidentiality and the Control Services Survey

Abt Associates will be responsible for administering the survey effort. Interviewers have access to the sample member's name, address and telephone number which have been stored in their laptop. All laptops used by Abt Associates' interviewers and other members of the SHM project research team meet OMB's and ACF's data security and encryption standards. Abt's proprietary Bellview CATI software allows interviewers to read and add information to files. They cannot print or change information. Specifically:

- Interviewers are not given the SSN's of sample members. They are given Abt-generated ID numbers.
- Cases are delivered electronically through a sample control subsystem that is part of the Bellview CATI system.
- Interviewers can obtain sample member's name, address, and telephone information from the Bellview CATI system. This system only allows the interviewer to read information, not print or extract it by other means.

Handling case material. Interviewers are sent cases via the CATI Data Collection System, which is integrated into Abt's proprietary Field Management System (FMS). The FMS is a major application composed of a set of interrelated applications that control all aspects of sampling, data collection, data cleaning and delivery of survey data. Interviewers are instructed to keep the Abt ID number, respondent name, contact address, telephone information and

answers private. The interviewers are also instructed not to disclose any information to anyone not associated with the project. Interviewers are allowed to discuss the interviews during interviewer meetings and during one-to-one supervisory sessions, but the interviews must be discussed in general terms, not identifying the individual.

In general, the interviewers do not have hard-copy files and all survey activities are completed electronically. If they have any handwritten notes used during the tracking and locating process, these notes must be shredded at the end of each interview.

Training procedures for interviewers. Abt Associates has a zero tolerance policy with regard to falsification or violation of respondent confidentiality/privacy. Confidentiality requirements are reviewed with all project employees and in addition, in project specific trainings which include modules on confidentiality and the protection of privacy covered. Abt Associate employees must also sign confidentiality pledges as a condition of their employment.

A11. Questions of a Sensitive Nature

This section contains additional justification for questions of a sensitive nature included in the control services survey. The questions on this survey deal primarily with services that study participants have accessed since random assignment, either through the SHM program or in the community. Some of these questions may be viewed as being sensitive in nature if a participant was uncomfortable disclosing that they sought help for their marriage or that they did not participate in SHM services. However, these kinds of questions are routinely asked in surveys and few people refuse to answer them. During survey pre-testing conducted by Abt Associates, none of the respondents refused to answer these questions. Importantly, at the outset of this survey, respondents will be reminded that they can refuse to answer the questions, their answers will be kept confidential, and that their agreement or refusal to participate will not affect their participation in the study or the ability to get services now or in the future.

A12. Estimates of the Hour Burden of Data Collection to Respondents

Participation in the control services survey is completely voluntary. No sanction or penalty will be applied to those participants receiving state or federal assistance who choose not to provide information. The control services survey will be administered to every participant in each site's SHM pilot, but respondents can choose not to answer any question.

As detailed in Section A2.2, respondents will be asked to respond to a brief series of questions about the services they have received since entering the SHM pilot. This includes questions about marriage education services and other services provided by the SHM site. It also asks respondents in the SHM program group about their attendance at SHM services. Lastly, respondents are asked to confirm their contact information.

MDRC projects that the data collection will be conducted within one year and the annual hour burden reflects that assumption. MDRC plans to administer the control services survey to between 86 and 174 respondents per site, or 808 respondents in one year, assuming an 80 percent response rate to this survey. Because our purpose is to examine service receipt by sample

members separately in each location of the study, we will need somewhat larger samples in sites that are recruiting and serving sample members in more than one location. Thus, sites with one location will have 86 respondents; sites with two locations will have 114 respondents, and the site with 3 locations will have 174 respondents. MDRC plans to randomly select couples from our SHM pilot sample for this survey. If we expect that we will not have enough sample members in the pilot phase to reach these sample sizes in a given site, we will select all of the pilot couples as well as a small number of couples who enter the full evaluation phase of the study.

Total burden hours are calculated as the number of respondents multiplied by the length of the control services survey. The response burden described here assumes that the study will include 8 sites with 86 to 174 respondents per site (or 808 respondents total) as the maximum possible burden for control services survey respondents.

The annual estimated burden hours are noted in Exhibit A12-1 below.

Exhibit A12-1

Annual Estimated Burden Hours of the SHM Control Services Survey

Instrument	Annual Number	Number	of	Average		Estimated
	of Respondents	Responses	per	Burden	Hours	Annual Burden
		Respondent		per Resp	onse	Hours
Eligibility	808	1		0.17 hours		137.4 hours
Checklist						
Estimated Annua	137.4 hours					

A12.1 Estimates of Cost Burden of Data Collection to Respondents

The SHM control services survey respondents will not be asked to incur costs that result from the proposed survey data collection activities. Their participation in the control services survey and in the SHM study is entirely voluntary.

A13. Estimates of Capital, Operating, and Start-Up Costs to Respondents and Record Keepers

Not applicable. The control services survey will be administered by research interviewers employed by Abt Associates and funded by MDRC as part of its research contract with ACF.

A14. Estimates of Costs to Federal Government

The estimated cost for designing the control services survey, preparing submissions for OMB and for MDRC's institutional review board, administering the survey, data entry and processing, and monitoring this survey effort is \$207,799. This estimate also includes an incentive of \$10 per person to compensate respondents for their time and maximize response rates. We expect

these costs to spread out over two years as we design the survey, administer it in each site, and process the results. This estimate includes \$30,000 in 2007 and \$177,799 in 2008. These costs do not include any costs of reporting on the control services survey data, since any reporting will be in the context of future implementation or impact reports.

A15. Changes in Burden

The efforts are all new data collection efforts and do not involve a change in burden.

A16. Tabulation, Analysis, and Publication Plans and Schedule

ACF expects that MDRC and Abt Associates will begin administering the control services survey in pilot sites in fall 2007. The exact timing of the survey will depend on progress in site development and program pilots. We intend to begin administering the survey about six months after each site has begun its SHM pilot. Summaries of the survey data will be prepared within a few months after survey administration is completed in each site.

At this time, there are no plans for publications exclusively dedicated to analyses of the control services survey. The survey data is primarily intended for use by ACF, MDRC and its subcontractors in determining whether there is a sufficient service differential between the program group and the control group to constitute a fair test of the SHM program model. However, as noted earlier, the information obtained through the control services survey will be critical to the overall SHM project and the SHM project includes plans for many publications, including our first report profiling the selected demonstration/evaluation site programs and discussing random assignment scheduled for 2008, implementation evaluation reports including a case study for each site in 2009, and interim and final impact analysis reports scheduled for 2010, 2012, and 2014, as well as research briefs and special topic reports as requested.

A17. Reasons for Not Displaying the OMB Approval Expiration Date

Not applicable. We intend to display the OMB approval number and expiration date on all survey materials.

A18. Exceptions to Certification Statement

Not applicable. We have no exceptions to the Certification Statement.