

**Innovative Strategies for Increasing Self-Sufficiency
(ISIS)**

**Supporting Statement
for OMB Clearance Request**

Part A

Justification

This section provides supporting statements for each of the eighteen points outlined in Part A of the OMB guidelines, for the collection of information in the *Innovative Strategies for Increasing Self-Sufficiency (ISIS)* demonstration and evaluation. This study will be carried out in two phases:

- Phase 1—selection of interventions to be tested and identification of six sites to be included in the study; and
- Phase 2—data collection in selected study sites, analysis, and reporting.

This submission seeks clearance for the Phase 1 information collection activities. A subsequent OMB submission will seek clearance for Phase 2 information collection activities.

A1. Circumstances Making the Collection of Information Necessary

The Administration for Children and Families (ACF) in the U.S. Department of Health and Human Services (HHS) seeks approval for the data collection activities described in this request in order to support a study being undertaken for ACF by Abt Associates Inc. The study, ISIS, will ultimately produce experimental tests of a range of promising strategies designed to promote employment and self-sufficiency, and to reduce dependence on cash welfare among low-income families, with the overall goal of increasing our knowledge about the effectiveness of different strategies. This section provides an overview of the overall study and discusses its objectives and the need for the proposed information collection.

For many years, both governments and private philanthropy have made investments to help improve the labor market outcomes and well-being of low-income parents and families. Fortunately, many of the interventions have been well evaluated, often with experimental methods, so progress has been made in developing strong evidence on what is effective and what is not. At the same time, many questions remain unanswered, and often interventions have been tested as a single package in a single site, severely restricting the more general application of their results. Appendix A summarizes the major findings from a variety of studies aimed at improving employment outcomes of low income families. It is within the context of some answers but many outstanding questions that the Administration for Children and Families is conducting the current study to search for effective employment and self-sufficiency strategies for low-income families.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate the collection. ACF is undertaking the collection at the discretion of the agency.

Study Objectives

As noted above, the overall objective of the *Innovative Strategies for Improving Self-Sufficiency (ISIS)* demonstration and evaluation is to test the next generation of promising and innovative strategies to improve the employment outcomes and increase the self-sufficiency of low-income families. The project will identify and evaluate multiple employment strategies that build on previous approaches and are adapted to the current federal, state, and local policy environment. The project will target current and former recipients of Temporary Assistance for Needy Families (TANF) benefits, as well as families at risk of receiving benefits.

Research questions to be addressed by the study include:

- **Implementation**—What approaches are provided under each intervention? What are the characteristics of the populations served? How are services for the target population implemented? How do services for the treatment group compare to the services available to the control group? What are the issues and challenges associated with implementing and operating the service packages and policy approaches studied?
- **Impact**—What are the net impacts of selected approaches under the project on outcomes including earnings, employment and employment retention, and public assistance receipt?
- **Subgroups**—Do some programs work better for some subgroups than others? How do program impacts vary by sub-group or by treatment type?
- **Cost effectiveness**—What are the costs of employment programs in the study? Do the estimated benefits of providing services or implementing policies outweigh the costs of these initiatives?

The study will use an experimental design in six sites to compare outcomes for randomly assigned treatment and control group members. Major study activities include:

- Identifying promising strategies and programs both through review of the literature as well as extensive contacts with the field in order to recommend which types of interventions are of the highest interest to the field and show the most promise for achieving substantial gains for low-income families.
- Recruiting sites to participate in the demonstration and evaluation of the selected interventions, providing limited assistance (if needed) to strengthen or expand programs, and providing technical guidance on evaluation support activities.
- Collecting data on the research sample at baseline and for up to five years post-random assignment.
- Analyzing data collected and preparing reports with the results.

The study is being conducted in two phases. During the first phase, we intend to use the proposed data collection to obtain similar information from multiple sources in order to ensure that the ISIS evaluation involves tests that will be of substantial interest to policymakers. This initial phase is essential in order to provide critical information that will serve as the basis for the remaining activities within the study.

During the second phase, the demonstrations will be established, participants will be randomly assigned to either the treatment or control group, data collection activities will occur, and data will be analyzed and reports prepared.

This OMB submission seeks clearance for the information collection activities from key stakeholders as part of the Phase 1 project activities. A subsequent submission will seek clearance for Phase 2 activities.

A2. Purpose and Use of the Information Collection

Achieving the goals of the ISIS project requires a strong intervention development process involving the review of existing research and engagement of key stakeholders including policymakers at various levels, program administrators and researchers. The strategy identification process must engage state officials and other stakeholders broadly in the process of highlighting important and relevant topics that the study should address. In the end, state and local interests will play a major role in the study since the project depends on finding programs willing to participate in a rigorous evaluation. The Phase 1 activities are an important first step toward developing strong, usable, and used findings.

We propose to engage in discussions with the following groups of stakeholders:

- Practitioners—administrators or staff of state agencies, local agencies, and programs with responsibility for employment-related services or activities for welfare-dependent and other low income families;
- Researchers—individuals who study and/or are experts on issues related to welfare policy and/or the conditions affecting poverty, economic self-sufficiency, and low-wage labor markets;
- Policy community—policy analysts and policy makers who are instrumental in applying research on poverty and on employment and social welfare policy to inform and, in some cases, craft public policies related to employment services or activities for welfare and other low income families.

The stakeholder discussions will focus on identifying strategies to be tested and demonstration sites to participate in the study. Through these discussions, participants will comment on the most important types of strategies that should be tested around the country. The short semi-structured discussions or focus groups will yield the respondent's perspective on:

- Important areas of focus today and over the next several years;
- Demographic groups with the greatest needs for employment assistance;
- Innovative and promising strategies—in general and in specific locations.

Appendix B presents the *Intervention Strategy Discussion Guide*.

The information gathered through the information collection will be used by ACF and the contractor staff to identify strategies, ideas, major research themes and questions that are most pressing to the

field that ISIS can answer. The information will be used to help narrow the set of programs that are considered and those that are recommended for inclusion in the evaluation.

Not collecting the information would diminish the degree to which this major next-generation study of employment and self-sufficiency initiatives reflects issues of greatest import to federal, state, and local policy makers. Accordingly, the information the study produces would be less relevant to the policy and program decisions they must make in designing efforts to help economically disadvantaged families. For that reason, this field assessment component is a crucial part of the ISIS study plan.

A3. Use of Improved Information Technology and Burden Reduction

The information will be collected through semi-structured discussions that are not conducive to information technology, such as computerized interviewing.

A4. Efforts to Identify Duplication and Use of Similar Information

The information collection requirements for the Phase 1 activities have been carefully reviewed to determine whether the needed information is already available. Literature reviews are being conducted to assess what is currently known about innovative and promising strategies to increase employment and self-sufficiency. However, in order to design the best possible demonstration interventions, it is crucial for study staff to understand the current perspectives of practitioners, researchers, and policy-makers. No existing data sources can provide this information.

A5. Impact on Small Businesses or Other Small Entities

Not applicable. No small businesses are expected to be involved.

A6. Consequences of Collecting Information Less Frequently

During Phase 1, information will be collected only once, thus no repetition of effort is planned. Not collecting the information at all would substantially limit the value of the investment ACF will make in this study. Identifying interventions of interest to policymakers and program administrators is crucial to ensuring that findings from the study are relevant to federal, state and local policymakers and program administrators.

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances for the proposed data collection.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13 and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on February 11, 2008, Volume 73, Number 28, page 7746, and provided a sixty-day period for public comment. A copy of this notice is attached as Appendix C.

During the notice and comment period, the government received 17 requests for copies of the instrument. All requests were fulfilled and no public comments were received.

Staff with Abt Associates Inc., the evaluation contractor hired by ACF, and their sub-contractors who have substantial knowledge of state and local employment-focus programs, and consultants, including key staff of the National Conference of State Legislatures, National Governors Association, and the American Public Human Services Association contributed to the discussion guide.

A9. Explanation of Any Payment or Gift to Respondents

No payments to respondents are proposed for this information collection.

A10. Assurance of Confidentiality Provided to Respondents

All persons interviewed by telephone or in-person as part of Phase 1: Demonstration Site Selection activities will be assured that the information they provide will not be released in a form that identifies them. Participants will be told that their conversations are not **confidential**, but that identifying information will not be attached to any public reports or data supplied to the U.S. Department of Health and Human Services or any other researchers.

A11. Justification for Sensitive Questions

There are no personally sensitive questions in this data collection.

A12. Estimates of Annualized Burden Hours and Costs

This proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses other than the time spent answering the questions contained in the *Intervention Strategy Discussion Guide*.

Exhibit A12.1 summarizes the reporting burden on respondents to the *Intervention Strategy Discussion Guide* submitted for OMB clearance. Response times were estimated from pre-tests with nine potential respondents. The annual burden is estimated from the total number of completed discussions and the minutes taken to complete the discussions. Thus, the total burden is expected to be 200 hours.

Exhibit A12.1

Phase 1 Information Collection Activities

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours
Intervention Strategy Discussion Guide	400	1	.5	200

Estimates of Annualized Costs

Survey respondents will be researchers (experts on issues related to welfare policy, poverty, economic self-sufficiency, and low-wage labor markets), practitioners (administrators or staff of state agencies, local agencies, and programs with responsibility for employment-related services or activities for welfare and other low income families), and policy analysts and policy makers. To compute the total estimated annual cost, the total burden hours were multiplied by the average hourly wage, according to the Bureau of Labor Statistics, National Compensation Survey, 2005 (\$29.81/hour). The total estimated annual cost is \$5,962.¹

Instrument	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Intervention Strategy Discussion Guide	200	\$29.81	\$5,962

A13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Not applicable. The Phase 1 information collection activities do not place any capital cost or cost of maintaining capital requirements on respondents.

A14. Annualized Cost to the Federal Government

The information collection activity and associated forms have been developed by the evaluation contractor, Abt Associates Inc. in performance of HHS Contract Number HHSP2332007291 3YC. Phase 1 data collection will take place beginning in late summer and continuing through winter 2008.

¹ Source: Bureau of Labor Statistics, National Compensation Survey, 2005. Average hourly wage of college teachers, social scientists, legislators, and public administration officials.

The total cost to the government as part of Phase 1 is \$152,064. This is also the annual cost for this collection as the collection will only take place over the course one year.

A15. Explanation for Program Changes or Adjustments

This submission to OMB is a new request for approval.

A16. Plans for Tabulation and Publication and Project Time Schedule

A16.1 Analysis Plan

Phase 1 of the *Innovative Strategies for Improving Self-Sufficiency (ISIS)* demonstration and evaluation involves selecting the interventions and demonstration sites for the study. As discussed in Sections A1 and A2, the ISIS evaluation is designed to test the next generation of promising and innovative strategies to improve the employment outcomes and increase the self-sufficiency of low-income families. This requires a strong intervention development process, involving policymakers at the federal, state, and local level; state and local TANF administrators; and researchers involved in studying issues of employment and poverty.

The interviews that will be conducted under Phase 1 will be used for internal study purposes, to help inform the types of interventions the study will examine and to assist in the identification and selection of demonstration sites. The interviews will be conducted by senior staff members familiar with the issues involved. Once an interview is complete, the staff member who conducted the interview will complete a contact form, summarizing the discussion. A copy of the contact form is presented in Appendix D. Use of the standardized form will ensure that consistent analysis or examination is completed for each interview.

The information obtained in the interviews will be combined with information obtained from the literature review of existing research and from attendance at relevant conferences and meetings to produce Promising Strategy Assessments. Assessments will be developed for each potential intervention strategy identified. The purposes of the assessments are: (1) to provide the basis for selecting a small number of strategies to pursue actively in the project's marketing phase; (2) to specify in some detail recommended program and evaluation designs for these strategies; and (3) assist in the identification of specific demonstration sites. The assessments are a form of "collaboration" with the field. That is, the goal is to draw in and engage, not just obtain information.

The Promising Strategy Assessments will follow a common outline, presented in Appendix E. The outline is organized around a set of key criteria that will be used to select the interventions to be tested in Phase 2 of the study.

A16.2 Time Schedule and Publications

This seven-year study began September 30, 2007 and will be completed by September 30, 2014. This OMB submission seeks approval for information collection as part of Phase 1 of the study which will

run from the summer through winter 2008. No formal publications will result directly from this information collection. A summary of the discussions, literature review, and information gathering as part of Phase 1 will be prepared and submitted to ACF. This publication is anticipated to be completed in the later part of 2008 or early 2009.

A17. Reason(s) Display of OMB Expiration Date is Inappropriate

All instruments for the *Innovative Strategies for Improving Self-Sufficiency (ISIS)* demonstration and evaluation will display the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.