

**Work Participation and TANF/WIA
Coordination Project**
Supporting Statement for OMB Clearance Request

Part A: Justification for the Collection of Baseline Data

May 2011

Revised October 2011

A1. Circumstances Making the Collection of Information Necessary

The Claims Resolution Act of 2010 extended the Temporary Assistance for Needy Families (TANF) Program and contains a section regarding reports required from the states concerning the reporting of allowable work activities, and “Other” TANF expenditures. The Act further provides that the Secretary may provide any additional information that he or she determines appropriate with respect to the information required by this section of the Act including information about individuals who have no hours of participation in work-related activities and the principal reasons for such non-participation. The purpose of the first portion of the project is to provide information relevant to this requirement that may not be reported directly to ACF by the States.

In addition, the 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), which created TANF, imposed time limits on receipt of cash assistance and broadened and strengthened mandates for clients to work or engage in work-related activities. These changes in particular increased the need for employment-related services for welfare recipients, applicants, and potential applicants. In 1998, the Workforce Investment Act (WIA) consolidated multiple employment-related public programs into a unified system through which comprehensive labor market information, job training, and job-finding assistance could be provided in "one-stop" service centers. Moreover, WIA mandated that in service areas in which funds are insufficient to serve all citizens, public assistance recipients and other low-income citizens have priority for services. Legislative intent was to have the two systems working together to improve the employment chances of low-income individuals. The second portion of the current project will look at exemplary programs involving cross-program coordination and the degree to which WIA program services are provided to TANF clients.

The activity for which this OMB clearance is being requested is a project wherein the following research questions are being addressed:

1. What is the nature of the data reported by selected states concerning Engagement in Additional Work Activities and Expenditures on other Benefits and Services in the Reports required by Congress?
2. What are the factors not presented in the data reported by these States to ACF that explain the circumstances of individuals who have no hours of participation and the principal reasons for such non-participation?
3. What is the nature of the TANF/WIA Coordination problems encountered?
4. What are examples of successful State TANF/WIA coordination efforts?

To accomplish this objective, ACF seeks approval of the proposed discussion guide to be used in telephone and in-person informal discussions with state TANF officials. The criteria set forth by ACF (see A16.1) will direct discussions with a Technical Working Group as well as federal officials to assist in strategically selecting states. Once states are chosen, state administrators will be contacted to identify key people with whom ACF should speak. Upon identifying contacts within the states, site visits will take place, during which discussions will occur. Some discussions may also occur by phone, depending on the convenience of the respondents. Following discussions, Mathematica Policy Research, Inc will develop for ACF: a report on work participation, a report on TANF/WIA coordination, and special reports.

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.

A2. Purpose and Use of the Information Collection

The primary purposes of the project for which this OMB Clearance is being requested are to: 1) to gather information from selected States concerning the data on Engagement in Additional Work Activities and Expenditures on “Other” Benefits and Services that are required to be reported by the States to Congress, and information on the coordination of TANF and WIA, and 2) to produce two reports to ACF providing a fuller explanation of the data contained in the State reports to ACF and examples of TANF/WIA coordination.

The 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) made sweeping changes to the welfare system in the United States, replacing the 60 year-old Aid to Families with Dependent Children program with a block grant to States to create the Temporary Assistance to Needy Families (TANF) program. The system that once focused on the delivery of cash benefits now encourages families to make the transition from welfare to work. The 2005 Deficit Reduction Act continued this emphasis. By limiting the time and conditions under which people could receive cash benefits, both pieces of legislation meant to move people into the workforce. The Claims Resolution Act of 2010 extended the TANF program and contains a section regarding reports required from the States concerning the reporting of allowable work activities. The Act requires that States report for a specified period whether individuals engage in activities directed toward attaining self-sufficiency and the specific activities among those that do not qualify as a work activity under section 407(d) but that are otherwise reasonably calculated to help the family move toward self-sufficiency; or that are of a type that would be counted toward the State participation rates under section 407 but for the fact that (a) the work-eligible individual did not engage in sufficient hours of the activity; (b) the work-eligible individual has reached the maximum time limit allowed for having participation in the activity counted toward the State's work participation rate; or (c) the number of work-eligible individuals engaged in such activity exceeds a limitation as noted in the statute. The Act further provides that the Secretary may provide any additional information that he or she determines appropriate with respect to the information required by this section of the Act including information about individuals who have no hours of participation and the principal reasons for such non-participation. Thus, one purpose of this project is to provide information relevant to this requirement that will not be reported directly to ACF by the States.

Concerning TANF-WIA Coordination study, in the second half of the 1990s, the nation's major cash assistance and workforce development systems underwent sweeping changes. In 1996, PRWORA created the TANF Program, which imposed time limits on receipt of cash assistance and broadened and strengthened mandates for clients to work or engage in work-related activities. In particular, these changes increased the need for employment-related services for welfare recipients, applicants, and potential applicants. In 1998, WIA consolidated multiple

employment-related public programs into a unified system through which comprehensive labor market information, job training, and job-finding assistance could be provided in One-Stop Career Centers. Moreover, WIA mandated that in service areas in which funds are insufficient to serve all citizens, public assistance recipients and other low-income citizens have priority for services. Legislative intent was to have the two systems working together to improve the employment chances of low-income individuals. Ongoing research on TANF/WIA coordination and integration has revealed wide variation in management structures, administrative designs, and implementation experiences. Studies have focused on the degree to which various factors may influence cross-program coordination and the degree to which WIA program services are provided to TANF clients. The purpose of the current study is to identify practices in TANF/WIA coordination in order to assist States and local jurisdictions to better implement this program.

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 will not duplicate information that is already available. Literature reviews and recent studies have been and will continue to be consulted (and, where necessary, additional review will be conducted) to assess what is currently known about additional work activities, expenditures on “Other” activities, and TANF/WIA coordination.

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

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.

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 March 30, 2011, Volume 76, Number 61, page 17654, and provided a sixty-day period for public comment.

During the notice and comment period, the government received one request for copies of the instruments. It was fulfilled.

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

For informal discussions, no personal identifying information beyond name, work telephone number, email address, and professional affiliation (e.g., name of the program, title, etc.) will be sought. Discussants will be told that their conversations will be kept private to the fullest extent of the law and that it is expected that their name and affiliation will only be included in summary information provided to ACF. ACF staff may participate in telephone or on-site discussions. Discussants will be told that, to the extent allowable by law, individual identifying information will not be disseminated publicly.

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 discussion guides.

Exhibit A12.1 summarizes the reporting burden on respondents. The annual burden is estimated from the total number of completed discussions proposed and the time required to complete the discussions. Based on past experience with similar discussion guides, it is estimated that the average individual discussion will take 2 hours. The total burden is expected to be 80 hours.

Survey respondents will be state TANF administrators. The source used to determine the wages were the 2009 Employment and Wages from Occupational Employment Statistics (OES) survey from the Bureau of Labor Statistics. The rate used for Researchers, Policy Experts, and state TANF personnel, \$33.14, is equivalent to state government managers under SOC code 11-9151.

Exhibit A12.1 Annual Information Collection Burden Estimate

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Discussion Guide for Use State TANF Personnel	40	1	2	80	\$33.14	\$2651.20
Totals				80		\$2651.20

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

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

A14. Annualized Cost to the Federal Government

Data collection will be carried out by Mathematica Policy Research, Inc, Information collection may continue for up to 24 months after award of contract, though most information is expected to be obtained in the first year. Based on our experience with other similar information collection activities carried out by contractors, total costs to the government are estimated to be approximately \$100,000. Combined with

the costs estimated for federal staff in the Office of Planning, Research and Evaluation in ACF to develop and review and the instruments, total costs are estimated to be \$103,000. Since information collection will occur over two years, annualized costs are estimated to be \$51,000.

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

The preliminary phases of the project will be to collect information that will be used for selecting sites. Discussions will be held with the Office of Family Assistance (OFA), Employment and Training Administration (ETA) Regional Offices and a TANF/WIA technical working group to select specific sites. These discussions and the resulting recommendations will be guided by the specific criteria from ACF. These selection criteria are the size of the caseload, the percentage of zero-hour cases, and particularly creative ways of assuring Temporary Assistance for Needy Families/Workforce Investment Act (TANF/WIA) coordination. This project is designed to delineate the nature of the data reported by the selected states concerning Engagement in Additional Work Activities and Expenditures on other Benefits and Services in the Reports required by Congress. This will help to determine what factors are not presented in the data reported by these States to ACF that explain the circumstances of individuals who have no hours of participation and the principal reasons for such non-participation. In addition, information on TANF/WIA coordination will be gathered. Individual summaries of all discussions and overarching summaries of information obtained from each source shall be prepared by the contractor.

The information obtained in the selected state interviews will be combined with information obtained in preparing for those interviews and the reviews of existing research to produce an initial report addressing the research questions. This will be presented in a briefing where additional questions may be raised. The final analysis and report will follow.

A16.2 Time Schedule and Publications

This study is expected to be conducted over a 24 month period. This OMB submission seeks approval for information collection as part of initial activities of the study, which will occur mostly in the first year of the project.

Activity	Expected Date
Review available information on state activities and discuss site selection with ACF, OFA, and ETA staff, and Technical Working Group.	0-3 months following OMB approval
Site Selection	Beginning immediately after OMB approval
Initial contact with state	1-6 months following OMB approval

TANF and WIA administrators to identify respondents	
Site Visits and telephone interviews	1-9 months following OMB approval
Final Report for Work Participation	12 months following OMB approval
Final Report for TANF/WIA Coordination	16 months following OMB approval
Special Reports	20-22 months following OMB approval

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

All instruments 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.