

Study of Coordination of Tribal TANF and Child Welfare Services

OMB Information Collection Request
New Collection

Supporting Statement

Part A

June 2012

Submitted By:
Office of Planning, Research and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

7th Floor, West Aerospace Building
370 L'Enfant Promenade, SW
Washington, D.C. 20447

Project Officer:
Anne F. Bergan

A1. Necessity for the Data Collection

The Office of Planning, Research and Evaluation (OPRE) in the Administration for Children and Families (ACF), U.S. Department of Health and Human Services (DHHS) seeks approval for the data collection described herein. The proposed information collection is necessary to support the study undertaken by ACF to document the approaches and strategies utilized by the tribes and tribal organizations that were awarded grants for Coordination of Tribal TANF and Child Welfare Services to Tribal Families at Risk of Child Abuse or Neglect.

The proposed descriptive study will describe and document the ways in which the tribal grantees create and adapt culturally relevant and appropriate approaches, systems, and programs to increase coordination and enhance service delivery to address child abuse and neglect. In addition, the study will document the challenges faced and lessons learned. The information developed through the study will be of value to ACF, the grantees, and a range of stakeholders working with and serving tribal communities, particularly those addressing prevention and reduction of child abuse and neglect.

In 2011, following a competitive application and review process, ACF's Office of Family Assistance (OFA) awarded discretionary grants for Coordination of Tribal TANF and Child Welfare Services to Tribal Families at Risk of Child Abuse or Neglect to 14 American Indian and Alaska Native tribes and tribal organizations that administer Tribal TANF programs (also referred to here as the 2011 TT-CW grantees).

Legislative background and purpose

Funding for the 2011 TT-CW grants was authorized by the Claims Resolution Act of 2010 [Section 811(b) of Pub. L. 111-291 (see Attachment A)], that included an extension of the TANF program and authorized funds for Healthy Marriage and Responsible Fatherhood grants. The statute allowed that a portion of those funds may be set aside to support grants: (1) to improve case management for families eligible for assistance from a Tribal TANF program; (2) for supportive services and assistance to tribal children in out-of-home placements and the tribal families caring for such children, including families who adopt such children; and (3) for prevention services and assistance to tribal families at risk of child abuse and neglect. This authority is similar to that authorized by the Deficit Reduction Act of 2005 [Section 7103 of Pub. L. 109-171 (see Attachment B) amended section 403(a)(2) of title IV-A of the Social Security Act].

In 2006, under the Deficit Reduction Act, ACF had funded ten Tribal TANF – Child Welfare Coordination discretionary grants for a five-year project period that ended in 2011. The 2010 legislation authorized additional awards for demonstration projects for coordination of child welfare and Tribal TANF services provided to tribal families at risk of child abuse or neglect. The purposes of the projects and the authorized uses of project funds remained the same. Authorized by this new legislation, in 2011 OFA awarded 14 grants following a competitive application process. The 2011 grants provided the opportunity for additional tribes to implement Tribal TANF - Child Welfare Coordination projects, and for most of the 2006 grantees to build on, modify, and/or expand their projects to address and meet these tribes' unique needs. *Study of Coordination of Tribal TANF and Child Welfare Services*

The proposed information collection, conducted as a descriptive study of the funded programs that serve tribal communities, will document the ways in which the tribal grantees create and adapt culturally relevant and appropriate approaches, systems, and programs, to increase coordination and enhance service delivery to address child abuse and neglect. The study will also document the challenges faced and lessons learned by the ACF grantees.

A2. Purpose and Use of the Information Collection

All 2011 TT-CW grantees are required, as a condition of receiving funding, to fully participate in an ACF-sponsored study of the funded projects. The information yielded by the proposed data collection will not only be of interest and value to ACF, the grantees, and a larger array of stakeholders, but will also specifically inform the funding agency of the progress of the grant-funded authorized activities, and the factors that facilitate or impede program implementation. The information collected by the proposed data collection will address the following critical research questions:

1. What are the key factors that influenced the submission of grant applications to support coordination, development of the approaches and implementation of actions/activities (e.g., organization and political context and history, key persons, rates of abuse/neglect, etc.)?
2. Were there changes made from the original design/plan as included in the grant application? Why?
3. What is the origin of the approach/model being implemented? Were adaptations required [of the approach/model] to work within Tribal programs and communities?
4. What is the nature of the intervention as implemented?
5. What are the goals and objectives?
6. What are the levels and characteristics of service provision and coordination between Tribal TANF and child welfare agencies and any other agencies/parties?
7. What staff is involved, what are their roles?
8. What are their [staff's] opinions or perceptions about the approaches proposed/taken through the grant and the extent to which the approaches/activities support meeting stated goals and objectives for the grant?
9. Were project goals and objectives accomplished?

10. Was there successful implementation of specific actions as proposed in the grant application?
11. How do grantees assess progress in meeting objectives?
12. What data are collected and how are data used (e.g., in what manner do grantees document and track the delivery of services, child/family outcomes)?

There are four primary instruments that will be utilized by the study team in conducting interviews to collect information to address the above research questions. The four proposed instruments that will guide the interviews are tailored to the following respondent groups: TT-CW project staff, TANF and child welfare staff, tribal or community partners, and tribal leaders or elders (included as Instruments 1, 2, 3, and 4 with this document). The fifth proposed instrument, an event participant survey, will be used to collect feedback from participants (generally project directors and coordinators) in conjunction with periodically held grantee meetings (Instrument 5). Finally, the sixth proposed protocol (Instrument 6)—not a data collection instrument—provides a guide of the main topics for the study team to cover in the introductory calls with the grantees.

A3. Improved Information Technology to Reduce Burden

Automated response collection is not appropriate for this information collection that relies on descriptive information gathered through face-to-face interviewing.

A4. Efforts to Identify Duplication

The proposed data collection is unique because the information is specific to the 2011 TT-CW grantees. There are no other information collection efforts that involve the collection of information on the approaches and strategies utilized by the 2011 TT-CW grantees in implementing their funded projects and the lessons learned from the grantees' program implementation. Furthermore, this information collection is expected to also serve the grantees' needs for documenting and learning from their project implementation.

A5. Involvement of Small Organizations

No small businesses are anticipated to be involved in this study and organizational size would not affect the relevance or importance of particular research questions.

A6. Consequences of Less Frequent Data Collection

This request is for approval to collect information from 2011 TT-CW grantees using semi-structured interviews. The interviews will be conducted once per year over the course of three years. Gathering information annually is essential for documenting the progress of the tribes and tribal organizations as they roll out their implementation of Tribal TANF and child welfare coordination activities. Less frequent data collection would inhibit the timely use of

the information by ACF and the grantees for assessment of program effects and continuous quality improvement (CQI).

A7. Special Circumstances

There are no special circumstances for the proposed data collection efforts.

A8. Federal Register Notice and Consultation

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 April 3, 2012, Volume 77, Number 64, page 20024, and provided a sixty-day period for public comment. No comments were received during this time. A copy of this notice is attached as Attachment C.

The instruments contained herein were thoroughly reviewed by individuals who are knowledgeable of the topics addressed and who have worked extensively with the grantees' and other tribal communities (i.e., Tribal members, consultant on data collection in tribal communities, OPRE, OFA, and Children's Bureau staff).

A9. Payment of Respondents

No payments to respondents are proposed for this information collection.

A10. Confidentiality of Respondents

All respondents will be informed of the importance of maintaining their privacy and that all reported data will be aggregated and interview responses will not be attributed to individual respondents.

Identifiers will be assigned to each respondent, in place of personal information. Only data that have been stripped of individually identifying information will be maintained in the data repository.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

The anticipated burden on the grantee is largely the time spent in the face-to-face discussions during each site visit. However, no interview should last longer than 90 minutes and the same individuals would not be asked to participate in more than one interview during each annual site visit. Interviews will be held with project directors, tribal leadership, Tribal TANF and child welfare staff and supervisors, and program partners. There are no costs to the respondents other than their time.

Where possible, some information on the four interview protocols may be prefilled prior to a site visit based on information gathered from grantees' documents (i.e., grant applications, semi-annual reports). Similarly, during follow-up site visits in years 2 and 3, some static information may be prefilled based on the previous year's interview responses.

The fifth proposed instrument, the Feedback Form, will be utilized only in conjunction with periodic grantee meetings. It is anticipated that up to five of these meetings will take place across three years. The participants—grantees' project directors and/or coordinators—will be invited to complete the form after each meeting. The form will take less than ten minutes to complete.

The study team will utilize the Guide to Introductory Call with the Tribal TANF-CW Grantees (Instrument 6) during one introductory call with each grantee's point of contact. The calls are estimated to take up to one hour with each grantee and will only occur in year 1.

The estimates for hourly costs were based on the average of median salaries of comparable positions as listed in May 2011 National Occupational Employment and Wage Estimates (U.S. Department of Labor, Bureau of Labor Statistics).

Instrument	Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Interview Protocol for Program Staff	9	3	1.5	41	30.00	1,230.00
Interview Protocol for TANF and CW Staff	19	3	1.0	57	21.00	1,197.00
Interview Protocol for Tribal and Community Partners	9	3	0.75	20	23.00	460.00
Interview Protocol for Tribal Leaders or Elders	9	3	1.0	27	35.00	945.00
Feedback Form for Community of Learning	10	5	0.15	8	30.00	240.00

Events						
Guide to Introductory Call with the Tribal TANF-CW Grantees	5	1	1	5	30.00	150.00
Estimated Annual Burden Sub-total				158		4,222.00

A13. Cost Burden to Respondents or Record Keepers

No additional cost burden will apply for respondents or record keepers.

A14. Estimate of Cost to the Federal Government

The total cost to the Federal Government for the three years of information collection is estimated to be \$987,932. The total annualized cost is estimated to be approximately \$329,311. The total costs consist of all costs related to the data collection including direct labor costs, other direct costs (including site visit travel, postage, document reproduction costs, telephone service, and contracts with outside consultants); and any fees on other direct costs.

A15. Change in Burden

This is a new information collection.

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication

Information to be collected

The descriptive study will yield information that reflects how the grantees’ projects were implemented; the goals and objectives achieved; and challenges, their resolutions, and lessons learned. The semi-structured interviews also will provide for an examination of “implementation drivers”, such as administrative and organizational support for the service coordination efforts; perspectives and practices of staff at various levels of each organization; implementation challenges; and efforts to incorporate data into program planning and implementation. Overall, the study will document program-wide implementation of Tribal TANF-child welfare coordination efforts. The proposed information collection includes a set of common information collection guides to use across the grantee sites to explore these topics. In addition, an important component of the information collection is the Coordination Outcomes Checklist (embedded in the interview protocols for the program staff and the TANF/CW staff) as it will provide comparable key information from a cross-site perspective.

The proposed information collection instruments are largely in the form of topical guides for conducting the semi-structured interviews rather than structured questionnaires. This format is conducive to ensuring that all topics of interest are addressed in a comprehensive and consistent manner while allowing site visit team members the flexibility to organize their interviews and topics in a manner that matches the roles and responsibilities of the respondents. This approach best facilitates candid discussions of topics to be explored.

Publications resulting from the qualitative analyses of information collected

The proposed descriptive study relies on qualitative data analysis of information from the multiple sources (interviews with multiple stakeholder groups and review of grantee documents) and will yield a richly descriptive and complex understanding of the grantees' experiences implementing the coordination projects.

The information collected will be analyzed and summarized in periodic briefings, interim reports, and a final report in narrative format. The narrative reporting of the findings will be written in a manner accessible to each of the intended audiences. The key reports are as follows: 1) Initial Report to document the strategies and approaches proposed by grantees and the early implementation experiences of grantees and partner organizations; 2) Interim Report to document the strategies and approaches implemented by grantees and partners, the mid-term implementation experiences, and lessons applicable to the practice field as well as policymakers; and 3) Final Report to document the strategies and approaches implemented by the grantees and partners, the mid-term implementation experiences, and lessons applicable to the practice field as well as policymakers.

The findings may also be made available in formats suitable for multiple uses and audiences, such as research briefs, papers, and/or summary study reports. The goal in producing these publications will not only be to summarize the research findings, but also to highlight key issues and lessons learned.

Project timetable

The proposed information collection will take place during site visits to the 14 Coordination of Tribal TANF and Child Welfare Services grantees to gain insights into topics related to intra-tribal collaboration, facilitators and barriers to program implementation, changes in family functioning and family engagement, and perceived benefits to children, youth, and families that stem from program participation. At each grantee site, the tribal leadership, program director(s), Tribal TANF and child welfare staff and supervisors, and program partners are the intended respondents for the interview data collection. Each of the 14 grantees will be visited three times. The site visits are expected to take place in 2012, 2013, and 2014. Data collection during the site visits will be complemented by an ongoing review of grantee-produced documents (i.e., annual and semi-annual reports that are submitted to the funding agency) and by informal communication with the grantees during regularly scheduled update calls.

A17. Reasons Not to Display OMB Expiration Date

The OMB expiration date for the information collection will appear on the instruments.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.