UNDERSTANDING THE DYNAMICS OF DISCONNECTION FROM EMPLOYMENT AND ASSISTANCE

OMB CLEARANCE PACKAGE:
SUPPORTING STATEMENT, PART A

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SUPPORTING STATEMENT Part A: Justification

This section provides supporting statements for each of the eighteen points outlined in Part A of the Office of Management and Budget (OMB) guidelines, for the collection of information for the study *Understanding the Dynamics of Disconnection from Employment and Assistance*, funded by the U.S. Department of Health and Human Services (HHS), Administration for Children and Families (ACF), Office of Planning, Research and Evaluation (OPRE). In 2011, OPRE contracted with the Urban Institute to conduct fieldwork with low-income individuals who are disconnected from employment and public assistance, including those not receiving cash assistance through the Temporary Assistance for Needy Families (TANF) program. In this request, OPRE seeks clearance from OMB for data collection to support the execution of this research study.

A1. Necessity for the Data Collection

The Office of Planning, Research and Evaluation (OPRE) desires to enhance its knowledge about the characteristics, circumstances and well-being of this disconnected population and to develop hypotheses for potential future research.

Since the creation of TANF in 1996, there has been concern about TANF recipients who leave TANF without finding work, as well as low-income individuals who may be eligible for TANF but are neither receiving TANF nor working. Low-income individuals and families who are not employed or receiving public assistance are often referred to as "disconnected." The need to develop a sound empirical knowledge base to improve understanding of this population has been identified by numerous policy makers at the federal, state and local levels.

In-depth discussions with disconnected mothers will contribute to improved understanding of specific reasons for their unemployment and lack of assistance, families' coping strategies, and families' perspectives on pathways out of disconnection.

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 of Survey and Data Collection Procedures

The goal of this information collection is to assess the challenges and context for families that are disconnected from employment and public assistance. Discussions with respondents will explore what their experiences of disconnectedness are, including when they have engaged or participated in employment and assistance programs, how individual, family, and household characteristics may influence their disconnected experiences, and how they cope during periods without employment and assistance.

Information on families disconnected from work and welfare is of great interest to the TANF program. Disconnected families are by definition eligible for TANF but not receiving it. It is important for the TANF program to understand who these families are, how they are getting by, their overall well-being, and why they are not participating in TANF.

Understanding how disconnected families are getting by, including their employment experiences, their income, their living arrangements, and their overall health and wellbeing is important for understanding the extent to which disconnection from TANF is or is not an important program and policy concern. Is disconnection from TANF a big problem for these families, or are they getting by? How concerned should policymakers be about this population? Qualitative information on the coping strategies and wellbeing of these families is important for understanding more about the overall situation of disconnected families and the extent to which the TANF program needs to be concerned about these families.

Qualitative information about respondents' experiences with government benefits, their perception of government programs, and their perception of barriers to participating in government programs, will provide important information for the TANF program on why eligible families are not participating in the program and specific barriers that those families perceive to participating in the program. This information can be used to generate hypotheses for further study and by the TANF program to help identify program practices that may pose barriers to participation.

Given that this is a qualitative study, that the sample size is relatively small, and that the sample will not necessarily be representative of the population of all disconnected mothers in the U.S., results of this study will be treated as exploratory and will not be used to make program and policy decisions, but rather will be used to generate hypotheses for future research and program analysis.

To carry out this data collection, site visits will be conducted in two sites with relatively high concentrations of low-income families: Los Angeles, California and Southeast Michigan. Respondents will be sampled from two existing longitudinal surveys in those sites:

1) The Best Start Los Angeles Pilot Community Evaluation, currently led by the Urban Institute's Health Policy Center and the Center for Healthier Children, Families and Communities at the University of California Los Angeles (UCLA), and
2) The Michigan Recession and Recovery Study (MRRS), conducted by the National Poverty Center of the University of Michigan.

Sampling from survey respondents from these existing studies is advantageous given the surveys' access to potentially hard to reach individuals that fit OPRE's study criteria and the current contracting organizations' involvement in these survey studies.

To fit the goals of the study, respondents must be low-income, unmarried women with children who are not working and not receiving TANF or Supplemental Security Income (SSI) for themselves. Women who are currently employed or receiving TANF may be included if they experienced at least six months of unemployment in the past two years, had a child and were unmarried during the period of unemployment, and were not receiving TANF at the time. Field staff will use multiple recruitment methods, detailed in supporting statement B, sections B.2 and B.3. Staff will screen potential respondents by telephone (see Appendices A-2, A-2S, and A-7 for screening scripts). The sample will include approximately 66 women total, 36 in LA and 30 in Michigan.

This exploratory study will involve one in-depth qualitative interview per respondent, expected to last approximately 90 minutes. Members of the research study team will utilize a field conversation guide to collect information from individual respondents (See Appendices A-9 and A-9S).

Data across respondents will be coded for themes that address the following research questions.

1. *What are the current, recent, and past employment experiences of respondents?*
    - *What are the perceptions of employment opportunities and barriers?*
2. *What experience have respondents had with government benefits and programs?*
    - *To what extent does this group receive government benefits?*
    - *What are the perceptions of government programs?*
    - *What are the perceptions of barriers to participating in government programs?*
3. *What sources of income and financial support do respondents rely on?*
    - *How stable are these sources of income?*
    - *How sufficient are these sources of income?*
4. *What are the housing arrangements of this group?*
    - *How stable are these housing arrangements?*
5. *What is the health and well-being of this group?*
6. *What are other major coping strategies used by respondents?*
7. *What role do social networks and supports play in disconnection?*

The table below maps questions in the conversation guide (Appendix A-9) to the study's research questions.

Study Research Question	***Related Conversation Guide Question***
Demographic/personal characteristics for context	1-10 age, race, immigrant status, marital status, education, children, household members, length of time in residence, current schooling/training
What are the current, recent, and past employment experiences of respondents? o *What are the perceptions of employment opportunities and barriers?*	11-20 Current/most Recent Employment 21-25 Employment History Last Two Years 26-30 Barriers/challenges to employment
What experience have respondents had with government benefits and programs? o *To what extent does this group receive government benefits?* o *What are the perceptions of government programs?* o *What are the perceptions of barriers to participating in government programs?*	31-33 Use of government benefits currently or in past ; experience applying; reasons not receiving 34 Biggest challenges to receipt and suggestions for change
What sources of income and financial support do respondents rely on? o *How stable are these sources of income?* o *How sufficient are these sources of income?*	35-41 Total and sources of income last year; stability of income; sources of income last month 42 Contributions of other household members 43-47 Financial difficulties
What are the housing arrangements of this group? o *How stable are these housing arrangements?*	48-52 Housing arrangements 53-58 Stability of housing arrangements
What is the health and well-being of this group?	59 Unmet medical needs 60-63 Health of respondent 64 Health of children
What are other major coping strategies used by respondents?	66-69 Coping strategies – for food, children's needs, sources of help
What role do social networks and supports play in disconnection?	70-75 Social networks and how provide support for respondent 76-77 How respondent provides support to network 78-81 People in network adding to stress/challenges
	82 Overall biggest challenges she faces 83 How can government help

The data collection instruments to be used are as follows:
Los Angeles Site:

- Advertisement Script (A-1)—For use by UCLA to inform potentially eligible Best Start LA participants about the study and to obtain consent to have UCLA send Urban Institute study staff their contact information
- Telephone Recruitment Script (A-2)—To recruit respondents and check eligibility
- Follow-up Telephone Script (A-3)—To schedule interviews with Los Angeles respondents
- Consent Form for Interviews (A-4)—To explain the study objectives and procedures and to obtain consent from respondents in Los Angeles
- Receipt of Payment Form (A-5)—To document whether a $40 gift of appreciation was accepted by the respondent for accounting purposes
- Consent Form for Linking Data for Los Angeles Site (A-6)—To explain the purpose of linking the study data to participants' Best Start LA survey data and to obtain consent to receive their study data from UCLA

Southeast Michigan Site:

- Telephone Recruitment Script and Screener (A-7)—To provide potentially eligible respondents in Michigan with more information about the study and check for eligibility
- Consent Form for Interviews (A-8)—To explain the study objectives and procedures and to obtain consent from respondents in Southeast Michigan

Both Sites:

- Conversation Guide (A-9)—To collect from the interview respondents the substantive information necessary for the study

Instruments A-1 through A-9 are provided in Appendices, including Spanish translations of Los Angeles site materials identified as instruments A-1S through A-6S, and A-9S.

A3. Improved Information Technology to Reduce Burden

To ensure that qualitative data collection activities produce comparable, complete, and high quality data, field staff will audio record discussions with respondents, with their consent, and later transcribe each audio recording to create an electronic Microsoft Word document containing the full transcript. Transcripts will be coded and analyzed using NVivo qualitative analysis software. Using NVivo will enhance the ability to ensure inter-coder reliability and to analyze the qualitative data systematically. Systematic analyses of the qualitative data will allow identification of patterns and themes among the respondents and across the two sites.

A4. Efforts to Identify Duplication

The data requirements for the study have been carefully reviewed to determine whether the needed information is already available. There is little available evidence that meets ACF's needs to understand the complex underlying reasons for disconnection, barriers to employment and access to public benefits, the effects of employment instability on families' economic and housing security, and the social networks families rely on for support.

Previous research on the disconnected population, primarily quantitative analyses, has identified the prevalence of disconnection, benefit use and employment barriers among the disconnected, and the duration and primary causes of disconnection to the extent possible using available data. (See Appendix C for a more detailed review of the research).

However, this existing body of research is limited for several reasons. Most of the existing evidence comes from local or national structured surveys that were not focused exclusively on the issue of disconnected families. These surveys tend to have limited information on the causes of disconnection. In addition, the format of a structured survey, usually administered over the phone, does not allow for a more nuanced discussion of the reasons for disconnection and coping strategies. In addition, some important topics are less often and less easily addressed in the large structured survey format, including questions of immigration status, mental health issues, or domestic violence.

Targeted qualitative fieldwork with this population will make important new contributions to the existing body of evidence.

A5. Involvement of Small Organizations
Information will not be collected from any small businesses or other small entities. Respondents will be individuals identified as meeting the study criteria.

A6. Consequences of Less Frequent Data Collection
This is a one-time data collection.

A7. Special Circumstances
There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

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 February 22, 2012, Volume 77, Number 35, page 10533, and provided a 60-day period for public comment. A copy of this notice is included as Appendix D. During the notice and comment period, the government did not receive any substantive comments.

In addition, the gaps in availability of similar data, the topic areas for data collection and the data collection sampling and methods were discussed at an expert roundtable meeting . A list of the 25 experts from outside of HHS that participated in the expert roundtable is included as Appendix E.

A9. Payment of Respondents
As a token of appreciation, a gift of $40 cash will be provided to each interview participant. This amount is consistent with gifts given as part of other recent ACF-funded projects involving 90-minute, in-depth interviews with low-income families, (for example, Child Care Choices of Low-Income Working Families, Determinants of Subsidy Stability and Continuity of Child Care in Illinois and New York). This approach expresses gratitude for the respondents' participation

but will not be an excessive amount that could be coercive to the low-income population targeted in this study. The payment will be provided in person after the respondent has signed an informed consent form to participate and before initiating the interview. Respondents who withdraw from the study during the interview or fail to complete the interview will still receive the $40.

A10. Confidentiality of Respondents

We will not invoke the Privacy Act for this study. This data collection is discretionary and we will not be retrieving information by personally identifiable information. Privacy will be protected by the processes put in place by the contractor, which comply with all Federal and Departmental regulations for private information and meet all of the obligations of the Privacy Act. OPRE has a Privacy Impact Assessment (PIA) that is in process of being published, which will cover this data collection.

Prior to the start of each interview, the researchers will obtain written informed consent from respondents and assure the respondents that the information provided will be kept private to the extent permitted by law. Specifically, none of the information obtained during the course of the study will be disclosed in such a way that individuals or organizations can be identified by anyone outside the research team, and the respondents will not be quoted by name. All research staff are required to sign the Urban Institute's *Staff Confidentiality Pledge* (see Appendix F).

This study is also under the purview of the Urban Institute's Institutional Review Board (IRB). A copy of the Certificate of IRB Approval from the Urban Institute is included in Appendix G. To receive IRB approval for this study, the data collection effort must adhere to the following principles:

- *Subjects are informed of the nature of the research and how it will be used, and their consent either obtained or explicitly waived, where risks to them are determined to be minimal.*
- *Adequate provision is made to protect the privacy of subjects and to maintain privacy of data, where promised and as appropriate.*
- *Risks to subjects are minimized to the extent possible within research designs.*
- *Risks to subjects (from the research) are reasonable in relation to anticipated benefits (from the research).*
- *The selection of subjects is as equitable as possible (the burdens and benefits of the research are fairly distributed) and particular attention is paid to research involving vulnerable populations and protected health information.*

The Urban Institute operates under rigorous procedures regarding the protection of private data, consistent with its federal-wide assurance of compliance approved by the Office of Human Research Protections of the U.S. Department of Health and Human Services.

Examples include firewalls, encryption, use of secure electronic connections and locked files or offices, and separation of identifying information from survey responses.

A11. Sensitive Questions

The interview will cover several topics that may be considered sensitive to some participants. Each topic is explained below, followed by a justification for these questions.

- *Domestic violence*. Respondents will be asked about any incidence of domestic violence which will provide contextual information about the respondents' home environment, family stability, and well-being. The experience of domestic violence can be a potential causal factor for disconnection, if a partner's actions have constrained the respondent from seeking regular employment and assistance.
- *Depression.* Respondents will be asked to comment on whether they have been feeling sad, blue, or depressed for an extended period of time in recent weeks, and if so, what that experience was like and whether the respondent sought any professional help or counseling.
- *Household instability*. Respondents will be asked to describe the places they have lived during the past two years, including reasons for changes (e.g., eviction) and the effect of the moves on their children and family.
- *Sources of income/credit.* Respondents will be asked to describe all sources of income from work (including undocumented work), public benefits, child support, and other sources, as well as support from loans and credit cards.
- *Social networks and relationships.* Respondents will be asked to identify the individuals who they rely on for financial, emotional, and instrumental support, their relationships with these individuals (noted in the data by first and last initial only and not full name), and the types of support they receive from and provide to individuals in their social networks. They will also report the individuals who cause them stress. The interviewer will probe on the nature of the respondent's relationships with her children's father(s), if the respondent does not mention him as part of her social network.
- *Immigration history.* Respondents will be asked to identify their country of origin, and immigrants will be asked in what year they immigrated to the United States. Interviewers will probe whether respondents experienced any legal barriers to employment or assistance (e.g., not having the right papers). If a respondent reports that her children's father or her spouse resides in her native country, the interviewer will probe whether the father/husband experienced deportation or immigration issues, and if so, how that has affected the family in terms of financial security and the respondent's ability to work.

These data are integral to understanding families' unique circumstances and the causes and consequences of disconnection from employment and public assistance. ACF is particularly interested in reasons why individuals are not working and not accessing public assistance, how families cope while being disconnected, and how being disconnected affects mothers' and children's well-being and family stability. These data will contribute to filling gaps in knowledge about disconnected families, such as reasons for disconnection, effects of disconnection on families, and how families manage during economic hardship. There is limited research available about how to reach and assist disconnected families in ways that will improve the well-being of families with different characteristics and in diverse circumstances, and the information collected on these topics will contribute knowledge in this area.

Interviewers will obtain written informed consent for all respondents prior to the interview. The consent form will notify respondents that some topics in the interview may be personal and sensitive, and might make them feel uncomfortable; however, the information shared will be used only for the purposes of this study and will be securely stored and kept private. The consent form describes why the data are being collected: *"Although you may not benefit directly from this study, your participation will help us understand the issues faced by families like yours so that the state and federal government can design better programs, policies, and services."*

Interviewers will advise respondents of their right to skip any questions or take a break during the interview. Interviewers will be prepared to provide participants as needed with a list of local community resources—such as employment services, food pantries, crisis hotlines, etc.

Data obtained will be kept private to the extent possible by law. Given the vulnerabilities of this population, there is a possible risk that information about child abuse, neglect or self-harm would be reported during the course of the interview administration, or observed during the interview, which may require the researcher to break the respondent's privacy and follow protocol to report such incidents to the local authorities.

A12. Estimation of Information Collection Burden

Exhibit 1 shows estimated burden of the information collection, which will take place within a one year period. The recruitment strategies vary by the two study sites; therefore time burden was calculated separately for each site and then totaled. In Los Angeles, the estimates of annualized hour burden are derived as follows:

- an advertisement script will be used with 300 Best Start LA survey participants to help identify potentially eligible and interested participants for the study under consideration, at an estimated 6 minutes;
- recruitment/screening calls will be made to 100 Best Start LA survey participants who are interested and potentially eligible at an estimated 15 minutes per call;
- follow-up scheduling calls will be made to 36 consented respondents from Los Angeles at an estimated 4 minutes per call;
- written informed consent will be obtained from 36 respondents at an estimated 12 minutes per respondent;
- the 36 respondents will complete a receipt of payment form after being offered a $40 gift of appreciation, which will take an estimated 2 minutes per respondent;
- written informed consent will be obtained from 36 respondents to link their Best Start LA survey data to their interview responses, at an estimated 5 minutes per respondent; and
- 36 respondents will each participate in one interview estimated to last 90 minutes per respondent.

In Southeast Michigan, the estimates of annualized hour burden are derived as follows:

- recruitment/screening calls will be made to 35 survey participants at an estimated 15 minutes per call;
- written informed consent will be obtained from 30 respondents at an estimated 12 minutes per respondent;
- 30 respondents will each participate in one interview estimated to last 90 minutes per respondent.

Exhibit 1: Estimated Burden in Annualized Hours and Costs

Instrument (and corresponding Appendix number)	Number of Respond-ents	Number of Responses Annually per Respondent	Total Annual Responses	Average Burden Hours Per Response	Estimated Burden Hours	Hourly Wage Rate	Annualized Cost
Advertisement Script - LA (A-1)	300	1	300	0.1	30	$9.00	$270.00
Telephone Recruitment Script and Screener - LA (A-2)	100	1	100	0.25	25	$9.00	$225.00
Follow-up Telephone Script to Schedule Interview - LA (A-3)	36	1	36	0.05	2	$9.00	$18.00
Consent Form for Interviews - LA (A-4)	36	1	36	0.2	7	$9.00	$63.00
Receipt of Payment Form - LA (A-5)	36	1	36	0.03	1	$9.00	$9.00
Consent Form for Linking Data - LA (A-6)	36	1	36	0.08	3	$9.00	$27.00
Telephone Recruitment Script and Screener - MI (A-7)	35	1	35	0.25	9	$9.00	$81.00
Consent Form for Interviews - MI (A-8)	30	1	30	0.2	6	$9.00	$54.00
Conversation guide - LA and MI (A-9)	66	1	66	1.5	99	$9.00	$891.00
TOTAL					**182**		**$1,638.00**

The two right-most columns of Exhibit A-2 show hourly wage rate and annualized cost to respondents (burden hours multiplied by the wage rate) for each data collection instrument. For these low-income disconnected mothers, we assume an hourly wage rate of $9.00. For reference, we assumed the wage rate is greater than the federal minimum wage of $7.25 per hour, the California state minimum wage of $8 per hour, and the Michigan minimum wage of $7.40 an hour. This is likely a conservative estimate (e.g. higher than the wage that can be easily earned by this population), given the definition of disconnection we are using is based on being low-income and without work. The estimated total annualized cost burden to respondents is $1,638.00.

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents. There is no record-keeping burden associated with any of these information collection activities.

A14. Estimate of Cost to the Federal Government

The total cost to the federal government of implementing the information collection activity is $145,526.

A15. Change in Burden

This is a new data collection.

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

All on-site interviews will be completed by fall 2013. Findings from analysis of the information assembled through on-site interviews will be presented by the research contractor in a final research report, expected in early 2014. The final report will include an executive summary and sections devoted to study background, research questions, methods, major findings, and conclusions. Appendices will present technical details on site selection, data collection, and data analysis. This report will be publically disseminated through OPRE and the Urban Institute, and will likely be submitted for publication in peer-reviewed professional journals. Findings will also be presented at research and practitioner conferences. Additionally, the findings will be used by OPRE to generate hypotheses for further study and by the TANF program to generate exploratory hypotheses about program practices that may pose barriers to participation.

A17. Reasons Not to Display OMB Expiration Date

All instruments and forms created for this project will display the OMB approval number and the expiration date for OMB approval.

A18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this data collection.