Descriptive Study of County- versus State-Administered Temporary Assistance for Needy Families (TANF) Programs

OMB Information Collection Request
New Collection

Supporting Statement

Part A

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JUSTIFICATION

APPENDICES

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for collecting information through semi-structured interviews with key State and county staff on questions of county TANF administration, policies, service delivery and program context, in six states and for collecting information through a telephone interview/web survey from state TANF administrators from other states. Through this information collection, ACF seeks to gain an in-depth, systematic understanding of the differences in program implementation, operations, outputs and outcomes between state and county-administered TANF programs, and identify special technical assistance needs of county-administered programs. The study participants and states with similarly-administrated programs ultimately will benefit through enhanced technical support that is better suited to the needs of county-administered TANF programs. Additionally, knowledge derived from this study on how policies and procedures can affect county-administered programs differently could yield better-informed decisions and more effective actions on the part of ACF.

Study Background

The 1996 Personal Responsibility and Work Opportunity Act (PRWORA) made sweeping changes to the welfare system in the United States, establishing the Temporary Needy Assistance for Needy Families (TANF) program. The TANF program, which is administered as a block grant to states, assists families in making the transition from welfare to work. To achieve program goals, states are using different approaches to administer their programs. While the majority of states use central state administration, nine states (California, Colorado, Minnesota, New Jersey, New York, North Carolina, North Dakota, Ohio, and Wisconsin) delegate the administration of the program to their counties, under state supervision (USDHHS, 2012). More than half of the TANF caseload and more than 30 percent of the nation's poor families live in these nine states with state supervised, county-administered systems.

A state-administered program is one in which TANF policy and operations decisions are made at the state level. The state may choose to impose uniform policies and operations statewide or to impose different policies and operations in different areas, such as rural areas or major cities. A county-administered program is one in which county staff operate the program, the state gives the counties some share of autonomy over TANF policy and operation decisions, and counties may bear some fiscal responsibility. However, this simple description masks the complexity of the relationships between states and counties in implementing TANF. To understand the county-administered programs requires examining not only the counties themselves, but also their relationships with states. The proposed study will systematically examine these relationships and their influence on TANF implementation, operations, outputs, and outcomes.

Improving performance of TANF requires understanding and effectively supporting county-administered systems as well as state-supervised systems. The main objective of this study is to provide documentation and lessons about different programmatic implementations and experiences of county-administered programs, identify areas of difference between county- and state-administered systems, and identify specific technical assistance needs of state supervised, county-administered systems.

A small body of academic literature has looked at factors that drive state decisions about state and county TANF administration and the resulting variation in service delivery and outcomes. Gainsborough (2003) finds that a majority of county-administered TANF programs share a prior history of county-administration under AFDC, while Adkinsson and Peach (2003) present evidence that states' decisions to move from county- to centralized administration under AFDC were driven by unique geographic, demographic, and economic and political factors in each state (Adkinsson and Peach 2000). Evidence from a study by Kim and Fording (2010) suggests that county-administered TANF programs have had greater caseload decline and are more likely to use sanctions. On the other hand, TANF recipients in county-administered states reflect higher rates of employment exits and earnings gains (Kim and Fording 2010).

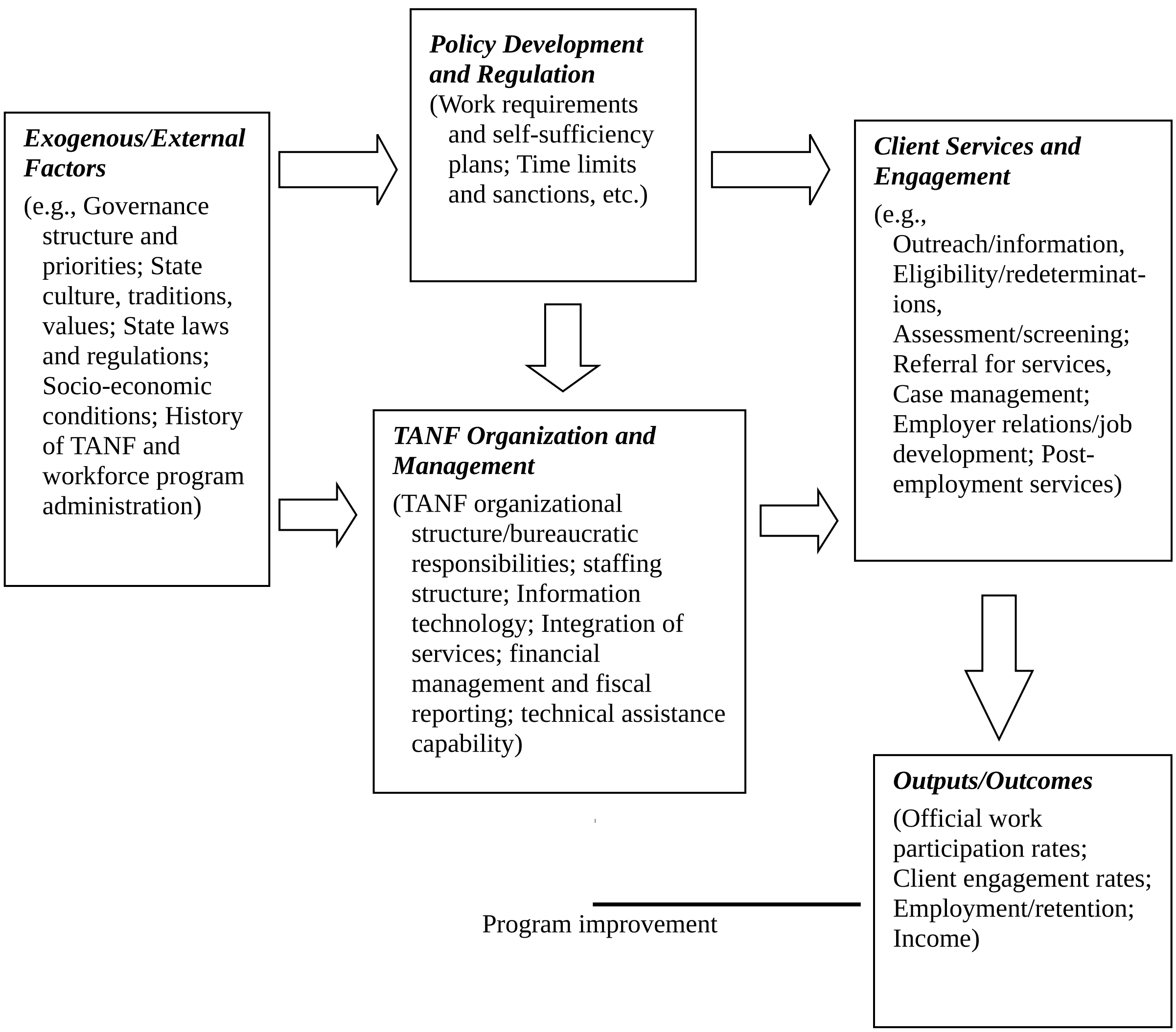
While the existing literature suggests some differences between state- and county-administered TANF programs, it is an academic literature, approaching the issue from the perspective of historians or political scientists. What ACF needs is more practical information about the implications of different approaches to TANF administration on matters such as: the dynamics of interaction between clients and the service delivery system, the extent of service integration between TANF and other work support programs; program outcomes such as work participation rates; and funding mechanisms. In addition, more information is needed on the particular TA needs of county-administered TANF programs. To gather this information, the Office of Planning, Research and Evaluation (OPRE) has contracted with the Urban Institute to conduct a descriptive study of county- versus state-administered TANF programs.

The study design is guided by a conceptual framework based on implementation analysis theory, a detailed understanding of TANF policy and administration, and an understanding of the particular issues related to county administration of TANF programs. The conceptual framework builds from a general theoretical framework about the many factors that influence the details of a TANF program, regardless of whether it is administered by a state or by a county. As depicted in Exhibit 1, external factors influence TANF policy choices; the structure, management, and operations of TANF; and how it is coordinated to achieve welfare and employment outcomes. Both policy and organizational choices in turn affect client engagement and service delivery, which influences outcomes; outcomes then feed back through performance improvement strategies into management choices.

In studying counties, this framework needs to be applied at both the state and county levels. For example, external factors may influence a state's policy and management choices, including its decision to devolve TANF administration to its counties, but external factors can also influence the particular decisions those counties make. Beyond the external factors, a primary focus of the framework and of this study is on the remaining components of the framework: how state and county policy choices interact with choices about structure and management of the TANF program to affect service delivery on the ground. The framework implies that even a study focused on administrative choices needs to pay attention to service delivery, because so much of the "production" of a program occurs at the service delivery level: individual eligibility determination, assessment of need for services, referral to services, provision of services, and the like. The details of this model along with administrative information on program performance and/or evaluation findings on outcomes can be used to identify differences and similarities among county-administered TANF programs as well as between state-administered and county-administered TANF programs.

The study design applies the general implementation framework in the specific context of county administration of TANF. County-administered TANF programs by their nature offer the possibility of more extensive variation in policy and management choices, as well as service delivery, and therefore greater variation in outputs and outcomes within a single state.

Exhibit 1: Conceptual Framework for Identifying Factors Related to TANF Implementation, Operations, Outputs, and Outcomes



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

Overview of Purpose and Approach

The goal of this information collection is to improve understanding of how state supervised, county-administered systems operate and how they vary from their state-administered counterparts, and to identify special technical assistance needs of state supervised, county-administered programs.

The study will collect information through semi-structured interviews with key state staff in six states that operate county-administered TANF programs and from key county staff from two counties within each of these states. In addition, the contractor will gather further information through telephone interviews with TANF directors in programs that are not county-administered. The data collection will focus on questions of county TANF administration, policies, service delivery and program context. The qualitative data will be supplemented with secondary data analysis of publicly available program and policy data from the full range of states administering TANF programs.

With OMB approval, the site visits to the six states and the telephone interviews will be conducted in the fall of 2013.

Research Questions

This study is guided by three primary research questions:

1. What do county-administered TANF programs look like?
2. How do county-administered TANF programs differ from state-administered TANF programs in terms of program implementation, operations, outputs, and outcomes?
3. Do county-administered TANF programs have unique technical assistance needs?

Each of the broad research questions encompasses detailed sub-questions that focus on specific aspects of program context, implementation, operations, outputs, and outcomes, as summarized below.

1. **What do county-administered TANF programs look like?** Specific questions about key elements of the implementation framework include, for example, the funding, financial management, and fiscal reporting mechanisms between states and counties; bureaucratic responsibilities and lines of communication between states and counties; authority for developing policies and regulations; availability of assistance and resources; access to IT systems and program performance data; service integration; program staffing; and the dynamics of client engagement with the service delivery system.

The study's exploration of county-administered programs will explore two different kinds of variation: variation among counties within a county-administered state (since greater variation compared to state-administered is a plausible hypothesis going in) and variation across states with county-administered TANF programs, since they differ on many dimensions. The site visits and interviews will be structured to explore both the degree and the dimensions of variation. It is also crucial to understand that the differences between state and county systems affect state staff, not only county staff. For example, state information technology or monitoring staff may play very different roles and need very different skills when they are providing assistance to other levels of government, compared to when the state has full responsibility. Thus, the description of county-administered states is not solely a description of county offices, but of the whole state-county system.

2. **How do county-administered TANF programs differ from state-administered TANF programs in terms of program implementation, operations, outputs, and outcomes?** This question builds on the first research question and adds a comparative element; that is, among the county patterns identified in the study, what can be said about the differences from state programs? Specific research sub-questions will examine, for example, what, if any, differences there are between county- and state-administered TANF programs in a) the dynamics of interaction between clients and the service delivery system (including for families who move across county lines), b) service integration and cooperation between TANF and other work support programs like SNAP, DOL-sponsored training programs, and child care programs, and c) clients' work-related activities and work participation rates. As above, it is key in this discussion to look at variation among local units, not just performance in a single local unit, and to consider differences in the roles of state as well as county staffs. It also will be key to explore the strengths of county-operated states—for example, do they take advantage of county variation to incubate innovations that can be spread?—as well as their potential weaknesses.

3. **Do county-administered TANF programs have unique technical assistance needs?** This research question builds on the data-gathering from both the previous questions to describe the particular technical assistance needs of county-administered TANF programs and the states that supervise them. For example, suppose information technology problems and the lack of capacity to get basic data or to analyze and understand them are widely reported in several of the county states, and both county and state staff report gaps in capacity not just among county staff but among state IT, technical assistance, and program staff who are unable to solve counties' problems. In this case, even though both state and county systems likely need IT and data-related technical assistance, the extra dimension of learning how to build data capacity at the county level may be particular to county-operated states.

Study Design

The three research questions will be addressed through a mixed-methods approach, drawing upon rich on-site interviews with state and county officials in six states, telephone interviews with a broader set of states to provide a context for the site visits, and analyses of policy and program data for the broadest scan of states and counties within states.

Semi-structured interviews with key personnel in six selected states and two counties within each of those states will help address all three major research questions. It is through site visits that the contractor will be able to gather the richest insights into the actual operations of TANF programs and explore most deeply what county-administered TANF programs “look like.” While on-site, researchers plan to conduct interviews with State TANF administrators or program managers (see Appendix A-1), State human service department directors or cabinet-level officials (see Appendix A-2); County TANF administrators (see Appendix A-3); County Executives or County Board members (see Appendix A-4), and County TANF directors’ associations or similar organizations (see Appendix A-5).

The six states will be selected from the universe of eight states that are consistently reported as states with state supervised, county-administered TANF programs. Review of policy and program administrative data (detailed below) will be used to guide the selection of the states to ensure that the selected TANF programs will provide as much diversity as possible and represent a large proportion of the national TANF caseload while also providing information that is relevant and applicable elsewhere. Additionally, two counties within each site will be selected for visits, with the goal of including counties that best represent the most common experiences and characteristics of county-administered TANF programs. Visiting a total of six states and two counties within each state will allow only a limited ability to draw inferences that apply generally to administrative approaches. Careful site selection (as detailed in Part B) and contextual placement, as described in greater detail below, will be critical to maximize the usefulness of the site visits for this purpose.

To identify characteristics that apply generally to both administrative approaches, it is important that the study include states with TANF programs that are not county-administered. The contractor will gather further information through structured telephone interviews with TANF directors in state-administered TANF programs.

To develop the context of the full range of TANF programs, the contractor will analyze policy and program data for all states as well as some substate areas An initial review of data will focus on the nine states identified as county-administered, in order to guide site selection. In addition, the contractor will analyze program and policy data from the six selected states, to provide more contextual information for the site visits and to assist in selection of the counties. Finally, the contractor will conduct systematic analyses of the full range of TANF programs to substantively address the research questions about differences between county-administered and state-administered TANF programs in implementation, operations, outputs, and outcomes. Key sources of information include the Welfare Rules Database and publicly available data from ACF. Publicly available data from ACF provide a wealth of information on state TANF programs and TANF recipients, through state reports, and reported aggregates of microdata (e.g., Annual Reports to Congress). The Welfare Rules Database, funded by HHS and maintained by the Urban Institute, is a comprehensive source of information on AFDC/TANF policies and program rules in effect in every state and the District of Columbia since 1996; it includes not only the standard rules in effect in each state but also variations in the rules within states. Although the database does not include complete information for all county-administered TANF programs, it will be especially useful for making comparisons across states.

In addition to the other data sources and research methods already discussed, the study team will address the research questions related to the technical assistance needs of county-administered TANF programs by drawing on information from past Welfare Peer TA discussions and reports.

Universe of Data Collection Efforts

The data collection instruments to be used are as follows:

- Discussion Guide for Use with State TANF Administrators or Program Managers (A-1): To collect from state TANF administrators in states with county-administered TANF programs the substantive information necessary for this study, including information on TANF administration across counties and on the state level.

- Discussion Guide for Use with State Human Service Department Director or Cabinet-Level Official (A-2): To collect from human service department officials the substantive information necessary for this study, such as the context and history of the TANF program on the state level.

- Discussion Guide for Use with County TANF Administrators (A-3): To collect from county TANF administrators the substantive information necessary for this study, including information on TANF administration, policies, service delivery, program context and technical assistance needs in their county.

- Discussion Guide for Use with County Executives or County Board Members (A-4): To collect from county-level officials the substantive information necessary for this study, such as information on the context and history of the TANF program in their county.

- Discussion Guide for Use with County TANF Directors' Associations, or Similar Organizations (A-5): To collect from representatives of county TANF directors' associations information across counties within a state.

- Telephone Interview Guide for State TANF Directors (A-6): To collect from states with state-administered TANF programs the substantive information necessary for this study.

Instruments A-1 through A-6 are provided in the separate Appendix A. Appendix A also includes supporting documents (A-7 through A-9) for correspondence regarding the data collection efforts.

A3. Improved Information Technology to Reduce Burden

Whenever possible, information technology will be used in data collection efforts to reduce burden on study participants and to minimize the contractor's costs of data collection. The most efficient way to collect the information needed is to interview state and county TANF administrators on-site and to conduct a telephone interview of state administrators who are not subject to the site visit. The study will not be using CAPI.

Each site visit interview will involve at least two members of the study team, with one asking questions and a second typing close to verbatim notes capturing key quotes and responses on a laptop. An audio recorder will be used with permission to later confirm direct quotes or other details from the sessions.

Notes taken during the interviews will be analyzed later with the assistance of the NVivo software program. The NVivo software program is designed to assist in managing, structuring, and analyzing qualitative data such as interview text through functions that support the classification, sorting, and comparing of text units. Because sections of text can be coded with multiple codes and cross-referenced, and intersections and unions of codes can be easily classified for analysis, the analyst can conduct queries that analyze patterns and associations within individual interviews and across interviews. Functions that allow for research notes to be attached to sections of text in an ongoing fashion aid with the identification of and analysis of emergent themes and analytic ideas.

A4. Efforts to Identify Duplication

The information collection will not duplicate information that is already available. The contractor will review and extract needed information from existing materials such the Welfare Rules Database and ACF publicly available data, including state reports, and reported aggregates of microdata (e.g., Annual Reports to Congress). These existing data can help set the context for the data gathered for this study but are not sufficient to answer the study's research questions.

A5. Involvement of Small Organizations

The County TANF directors' associations interviewed may be small organizations. Burden will be minimized for respondents by restricting the interview length to the minimum required, by conducting these interviews on-site, and by requiring no record-keeping or written responses from county respondents.

A6. Consequences of Less Frequent Data Collection

This is a one-time data collection.

A7. Special Circumstances

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

A8. Federal Register Notice and Consultation

Federal Register Notice and Comments

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 January 8, 2013, Volume 78, Number 5, page 1213, and provided a sixty-day period for public comment. A copy of this notice is attached as Appendix B**.** During the notice and comment period, no comments were received.

Consultation with Experts Outside of the Study

There was no consultation with experts outside of the study.

A9. Incentives for Respondents

No incentives for respondents are proposed for this information collection.

A10. Privacy of Respondents

Every effort will be made to maintain the privacy of respondents, to the extent permitted by law. All respondents included in the study will be informed that information they provide will be used only for the purpose of this research. Individuals will not be cited as sources of information in prepared reports. All researcher staff assigned to the study will be required to sign the Urban Institute's *Staff Confidentiality Pledge*. See Appendix D.

This study is also under the purview of the Urban Institute's Institutional Review Board (IRB). See Appendix C

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Table 1 shows estimated burden of the information collection, which will take place within a one year period. A total of approximately 72 individuals will be interviewed, including 42 individuals interviewed during the site visits and 30 individuals interviewed through structured telephone interviews. The 42 individuals interviewed on-site include approximately 6 state TANF administrators, 6 state human service department directors or cabinet-level officials, 12 county TANF administrators, 12 County Executives or County Board members, and 6 staff at County TANF directors' associations or similar organizations. The estimate for telephone interviews assumes that 30 out of the 42 state TANF directors contacted will participate in the telephone interview. As shown in Table 1, the total number of annual burden hours for this effort is 66. This is a one-time data collection effort.

Total Burden Requested Under this Information Collection

Table 1: Estimated Burden in Annualized Hours and Costs

Instrument (and appendix number)	Total Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
State TANF administrators discussion guide (A-1)	6	1	1	6	6	$30.43	$183
State human service department director discussion guide (A-2)	6	1	1	6	6	$30.43	$183
County TANF administrators discussion guide (A-3)	12	1	1.5	18	18	$30.43	$548
County executives discussion guide (A-4)	12	1	1	12	12	$30.43	$365
County TANF directors' associations discussion guide (A-5)	6	1	1.5	9	9	$30.43	$274
Telephone interview protocol for state TANF directors (A-6)	30	1	0.5	15	15	$30.43	$456
Estimated Annual Burden Sub-total					**66**		**$2,009**

Total Annual Cost

The total annual cost burden to respondents for this information collection is estimated as $2,009, as shown in the last column of Table 1. The assumed hourly wage rate for the various state and county official and administrators involved in the data collection is the mean hourly wage ($30.43) for "Social and Community Service Managers", based on the most recent data (May 2011) from the Bureau of Labor Statistics (http://www.bls.gov/oes/current/oes119151.htm).

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

Annual costs to the Federal government will be $170,711 for the proposed data collection. This information collection request is for a one-year period.

A15. Change in Burden

This is a new data collection.

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

The site visits will be conducted in the fall of 2013 (October-November). Telephone interviews and related outreach also will be conducted in the fall of 2013.

Following site visits and telephone interviews, site visitors and telephone interviewers will clean their notes and decide on a predefined coding scheme that will be used to code the qualitative interview data. A small group of qualitative analysts will code each interview transcript and subsequently analyze the coded themes to key themes and differences and commonalities among the sites visited in terms of their program implementation and operations as well as their program outputs and outcomes. All coding will be done in NVivo, a qualitative software program that is designed to assist in managing, structuring, and analyzing qualitative data, and that allows one to see coding in a given source and to compare the coding across coders for reliability checks. Initial analyses of both qualitative interview data and quantitative administrative data will be completed by January 2014.

Based on the analysis of results in all substantive areas, including findings from secondary data analysis and from analysis of all primary data-collection efforts, the contractor will produce a final report of publishable quality by July 2014. Findings will also be presented in briefings to federal officials and staff during the summer of 2014.

A17. Reasons Not to Display OMB Expiration Date

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.

REFERENCES

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