Temporary Assistance for Needy Families Study (Two-Parent TANF)

OMB Information Collection Request
New Collection

Supporting Statement

Part A

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Submitted By:
Office of Planning, Research and Evaluation
Administration for Children and Families
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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 local staff, community-based organization representatives, and adult members of two-parent families who receive Temporary Assistance for Needy Families (TANF) on questions of TANF policies, service delivery, and program context, in five states and for collecting information through telephone interviews from state TANF administrators from 10 states. Through this information collection, ACF seeks to gain an in-depth, systematic understanding of the characteristics of two-parent families participating in or eligible to receive TANF, the variety of services two-parent families receive through TANF, how state policies may affect participation in TANF among two-parent families, and how the beliefs of staff and eligible families affect two-parent families' participation in TANF. Knowledge derived from this study could yield better-informed decisions and more effective actions on the part of ACF. Ultimately, the information collected from this study will promote a better understanding of how the circumstances and characteristics of two-parent families connected to TANF interact with state policies. This understanding is important, not just in considering how to serve these families, but how to serve them more effectively. Study results will be used not just for increasing participation but also to better serve two parent families, improving access for eligible families if they choose to participate.

Study Background

TANF funds are available to serve both single parent and two-parent families. However, a minority of the more than 1.4 million two-parent families eligible for TANF at some point in 2013, received the cash benefits or other assistance for which they were eligible. Two-parent families are also less likely than single-parent families to receive the TANF assistance for which they are eligible. This study will explore how TANF policies and the characteristics of two-parent families eligible for TANF may contribute to the limited TANF participation of two-parent families. In addition, the information collected through this study will provide a better understanding of the characteristics and needs of the two-parent families who do receive TANF assistance and services, so that the program may better meet their needs.

According to data from the Urban Institute's National Survey of America's Families (NSAF), soon after TANF implementation in 1997, 13 percent of children living with both of their natural parents received TANF, compared with 49 percent of children living with a single parent, among families with incomes less than half of the federal poverty level. That difference partly reflects differences in rules for one- and two-parent families. In fiscal year 2006, the overall TANF participation rate was 38.9 percent while the rate for families with two parents both in the assistance unit was 20.0 percent. The number of two-parent families receiving cash aid according to administrative data was only one-fifth of the number that appeared to be eligible for cash aid. A 2010 GAO study again found that two-parent families were disproportionately likely to be eligible for, but not participating in, TANF. One of the goals of the current information collection is to understand some of the differences between participating and non-participating two-parent families, and to provide insights into the reasons for non-participation.

To understand how to better serve two-parent families, this study will collect information about how state policy choices affect the service offered to and accessed by two-parent families. While TANF aims to encourage the formation and maintenance of two-parent families, certain provisions in TANF can create challenges, incentives, and opportunities for states in serving two-parent families. Three such provisions are as follows:

> First, the TANF funding structure and related state policy flexibility allow states to choose which families have access to various benefits and what conditions they need to meet—for example, whether an initial period searching for work is required before families can receive cash assistance; what benefit amounts families receive; and for what time periods (subject to the federal maximum) they are able to receive benefits. States may choose not to serve two-parent families at all through TANF, or they may impose different work requirements and eligibility or benefit standards than those that apply to single-parent families. These state TANF rules, in turn, may affect the participation of two-parent families and state program outcomes. A key research question in this study is how state TANF policies affect two-parent families specifically, and how the characteristics of two-parent families affect their program participation and experiences.
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> Second, federal work participation rate requirements are stricter for two-parent families than for single-parent families, both for the states and family members. To ensure compliance with the work participation rate requirement, some states have chosen to remove two-parent families from the calculation of the state's work participation rate by using state dollars that do not count toward the state's required program spending (i.e., maintenance-of-effort (MOE)). This type of financing is known as solely state-funded (SSF) assistance. Because many states use SSF funding for some or all of the two-parent caseload, and that number is not officially reported, the total number of two-parent families receiving cash aid is not available from HHS/ACF data. The study will collect and analyze information on selected states' use of SSF programs to serve two-parent families otherwise eligible for TANF.
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> Third, beyond providing cash assistance to low-income families, states use the TANF block grant and state MOE funds to provide a wide array of services that support the TANF goals, not only for current and former TANF cash assistance recipients, but also for a broader population. These services, called "nonassistance," include child care, transportation, refundable tax credits, short-term assistance (including diversion payments), and employment programs. States likely differ in the extent to which they provide services to families not receiving or not eligible for cash assistance, and which services they provide to two-parent families. The study will collect and analyze the services offered to two-parent families, both on and eligible for TANF, and the extent to which those services are accessed.

Finally, families' perceptions of and responses to program policies also are critically important in fully understanding the dynamics of two-parent families' experiences with TANF. The authors of a 2005 study examining TANF participation among two-parent families hypothesized that two-parent families may experience stigma from program participation differently, have different expectations of their own employment prospects, or be less aware of their potential eligibility for assistance than single parent families. They also raised the question of whether differences in policy implementation, even where there are no differences in written policies, may partially explain the differences in participation between single-parent and two-parent families. The current study will systematically examine not only written policies but also whether policies are implemented differently for single and two-parent families, including examining how differing beliefs, attitudes, or perceptions of TANF staff—as well as two-parent families themselves—may result in different TANF experiences for two-parent families.

Resources referenced above:

Sorenson, Elaine, Ronald Mincy, and Ariel Halpern. "Redirecting Welfare Policy Toward Building Strong Families." (Washington, D.C.: The Urban Institute, 2000)

U.S. Government Accountability Office. "Temporary Assistance for Needy Families: Implications of Recent Legislative and Economic Changes for State Programs and Work Participation Rates." (Washington, D.C.: GAO, 2010).

Rangarajan, Anu, Laura Castner, Melissa A. Clark. "Public Assistance Use Among Two-Parent Families: An Analysis of TANF and Food Stamp Program Eligibility and Participation, Final Report." (Princeton, NJ: Mathematica Policy Research, Inc., January 2005).

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 goals of this study are to understand: 1) the characteristics of two-parent families on or eligible for TANF; 2) factors (including state policies and staff and eligible families beliefs about TANF) that may affect two-parent families' participation in TANF; and 3) the variety of services that two-parent families receive through TANF.

The study will collect information through semi-structured interviews with key State and local staff, community-based organization representatives, and adult members of two-parent

TANF families. In addition, the contractor will gather further information through telephone interviews with TANF directors in 10 states (five of which will correspond to the states selected for site visits). The data collection will focus on questions of TANF administration, family characteristics, services offered, state policies, and staff and recipient perceptions. 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.

It is anticipated that following OMB approval, the site visits to the five states and the telephone interviews will take place over a period of up to 3 months.

Research Questions

This study is guided by four primary research questions:

1. What are the characteristics of two-parent families participating in or eligible to receive TANF, including the strengths and challenges of these families?
2. What variety of services do two-parent families receive through TANF?
3. How do state policies affect participation in TANF among two-parent families with particular characteristics? and
4. How do the beliefs, attitudes, and perceptions of staff and/or eligible families affect two-parent families' participation in TANF?

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 are the characteristics of two-parent families participating in or eligible to receive TANF, including the strengths and challenges of these families?** Specific questions include, for example:
   - What are the characteristics, including demographics, employment histories, skill levels, and incomes, of two-parent families participating in or eligible to receive TANF?
   - How, if at all, do the characteristics of participating families differ from those of families who are eligible but not participating?
   - Do the characteristics of families served through SSFs differ from those served through TANF, across states?
   - What individual characteristics or family circumstances (employment history, education and skill levels, mental illness, substance abuse, and criminal record) make it challenging for the family to be self-sufficient? What are their strengths?

2. **What variety of services do two-parent families receive through TANF?** Specific questions include, for example:
   - Among two-parent families receiving cash assistance, what services (e.g. assessments, case management, training, job search, barrier removal, referrals,

child care, transportation, etc.) do they access? What services do two-parent families not receiving cash assistance access?
- How do the services offered to and accessed by two-parent families vary depending on characteristics of the family (e.g. employment history, barriers to employment, cohabiting)?
- To what extent do the services accessed by two-parent families differ from those accessed by single-parent families?

3. **How do state policies affect participation in TANF among two-parent families with particular characteristics?** Specific questions include, for example:
    - How does TANF participation among two-parent families vary among subgroups of states with different policies?
    - Are SSFs designed to include families whose characteristics suggest they would have difficulty meeting the work requirement?
    - How do two-parent families believe their personal characteristics and family circumstances help or hinder their program participation?

4. **How do the beliefs, attitudes, and perceptions of staff and/or eligible families affect two-parent families' participation in TANF?** Specific questions include, for example:
    - What are staff perceptions of the characteristics, strengths, and challenges of two-parent families on or eligible for TANF, and how do these compare with single-parent families? How do staff see the characteristics of two-parent families facilitating or hindering the family's ability to meet program requirements and/or achieve self-sufficiency?
    - What characteristics of two-parent families do staff believe make it challenging for staff to serve two-parent families?
    - What are two-parent families' perceptions of the benefits and services available to them through TANF? What are their perceptions of the processes of applying for and maintaining program participation?

Study Design

The goal of this study is to provide information on the characteristics of two-parent families on or eligible for TANF. To fully address the scope of these goals, the study design draws on and employs multiple research methodologies in a tiered approach to: 1) provide information on a national scale; 2) gather additional, more in-depth information for 10 selected states; and 3) further information, more in-depth for five of the ten states. This multi-method approach includes 1) in-depth site visits, including focus groups, in five states; 2) phone interviews with state (and selected county) TANF directors in ten states; 3) analyses of available state program data in ten states, including data from up to four states on two-parent families participating in SSFs; 4) queries and analyses of state-by-state policies included in the Welfare Rules Database; and 5) microsimulation analyses and analyses of TANF microdata collected by the federal government. OMB clearance for the latter two approach elements is not required because the data sources – the Welfare Rules Database, TRIM3 Microsimulation Model and CPS and ACS data – are available for public use. The design will provide rich and complete answers to the key research questions in each component of the study. for each research question. illustrates the data sources for each research question.

Exhibit 1. Matrix of Key Research Questions and Data Sources

	Data Sources				
	TRIM3 Micro-simulation	**WRD**	**Analyses of Admin Data (10 states)**	**Phone Interviews (10 states)**	**Site visits (5 states)**
Research Questions					
SC1: CHARACTERISTICS OF TWO-PARENT FAMILIES ON OR ELIGIBLE FOR TANF					
1.1 What are the characteristics of two-parent families participating in or eligible to receive TANF, including the strengths and challenges of these families?	X		X	X	X
1.2 What variety of services do two-parent families receive through TANF?		X		X	X
1.3 How do state policies help or hinder two-parent families' participation in TANF?	X		X	X	X
1.4 How do the beliefs, attitudes, and perceptions of staff and/or families help or hinder two-parent families' participation in TANF?				X	X

Universe of Data Collection Efforts

To collect the substantive information necessary for this study from state and local TANF directors and staff, community-based organizations, and adult members of low-income families on or eligible for TANF, the study team will use the following data collection instruments:

- Discussion guide for use with state TANF directors (Instrument 1)
- Discussion guide for use with local TANF directors (Instrument 2)
- Discussion guide for use with local TANF front-line staff (Instrument 3)
- Discussion guide for use with community-based organizations (Instrument 4)
- Discussion guide for client focus groups (both recipients and non-recipients and information form for both groups) (Instrument 5)

- Discussion guide for client one on one discussions (Instrument 6)

The discussion guides are provided as Instruments 1 through 6. Appendix A includes supporting documents (A-1 through A-3) 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 county- and local-level respondents on-site and to conduct a telephone interview of state administrators. The study will not be using computer-assisted instruments because the semi-structured interviews used for the qualitative data collection require the study team to follow nuances in respondents' answers and ask follow-up questions if needed, which is not efficient in a computer-assisted survey method.

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. There are no other studies specifically examining TANF participation among two-parent families in light of their characteristics and the policies targeting TANF two-parent families. Additionally, already existing materials, such as the Welfare Rules Database and ACF publicly available data, including state reports, and reported aggregates of microdata (e.g., Annual Reports to Congress) will be used for some analyses, rather than conducting new data collection. 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 community-based organizations 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 community-based organization 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 December 30, 2014, Volume 79, Number 249, page 78442, 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, we received two requests for the proposed information collection materials and no comments. Requests for materials were fulfilled.

Consultation with Experts Outside of the Study

There was no consultation with experts outside of the study. All experts were a part of the study team (See B5 for more information).

A9. Incentives for Respondents

Each focus group participant will receive a $40.00 gift card and each individual interview participant a $30 gift card as a token of appreciation. The proposed incentives for respondents will both offset the cost of participation, and serve as a means for reducing nonresponse bias. The incentive will help offset the cost of transportation and child care associated with voluntary participation in the study. Offsetting those costs will help ensure that we get an adequate number of these hard-to-reach families to participate in the study. Additionally, incentive payments for two-parent families is expected to reduce nonresponse bias by helping to encourage people to want to participate in the study (see Section B3 for more information on non-response bias).

The gift card will be provided at the time of the focus group or individual interview, after careful explanation of the procedures for the focus group or interview. Any individual who chooses not to participate after receiving the detailed explanation will be provided the gift card so that the token of appreciation is not perceived as a coercion to participate. It is anticipated that there will be up to a total of 112 focus group participants and 25 clients participating in the individual interviews. Table 1 shows the total remuneration for both the interviews and focus groups and a grand total. Incentives are for the adults of two-parent homes only – not key state and local staff or community-based organization representative.

A10. Privacy of Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

As specified in the contract, the Contractor shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. The Contractor has developed a Data Safety and Monitoring Plan that assesses all protections of respondents' personally identifiable information. The Contractor shall ensure that all of its employees who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements. 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.

As specified in the evaluator's contract, the Contractor shall use Federal Information Processing Standard (currently, FIPS 140-2) compliant encryption (Security Requirements for Cryptographic Module, as amended) to protect all instances of sensitive information during storage and transmission. The Contractor shall securely generate and manage encryption keys to prevent unauthorized decryption of information, in accordance with the Federal Processing Standard. The Contractor shall: ensure that this standard is incorporated into the Contractor's property management/control system; establish a procedure to account for all laptop computers, desktop computers, and other mobile devices and portable media that store or process sensitive information. Any data stored electronically will be secured in accordance with the most current National Institute of Standards and Technology (NIST) requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for minimizing to the extent possible the inclusion of sensitive information on paper records and for the protection of any paper records, field notes, or other documents that contain sensitive or personally identifiable information that ensures secure storage and limits on access.

The Office of Planning, Research and Evaluation is in the process of publishing a Privacy Impact Assessment (PIA) to ensure that information handling conforms with applicable legal, regulatory, and policy requirements regarding privacy; determine the risks of collecting and maintaining PII; assists in identifying protections and alternative processes for handling PII to mitigate potential privacy risks; and communicates an information system's privacy practices to the public. This PIA, titled ACF Research and Evaluation Studies, will be available online through the Department of Health and Human Services.

A11. Sensitive Questions

There are no directly asked sensitive questions in this data collection, but there are probes to questions that could be considered sensitive.

For example, during the one-on-one interviews, respondents will be asked: What family circumstances or personal characteristics make it hard for you and your family to get by?*(Probe: employment history, education and skills level, mental illness, substance abuse, criminal record)*

Allowing participants to discuss these issues is important for ACF to understand what is happening with two-parent families and to have an accurate understanding of issues that make it hard for these families to participate or get by. It is important to allow participants to discuss topics such as those in order to a full picture of why or why not families are participating in TANF and what are some barriers that make it difficult for families to participate. This is especially important given the broad flexibility afforded to states through the block grant that can include specific eligibility or work requirements tailored to family circumstances or personal characteristics. The ability to follow through on these questions facilitates a review of how states make these decisions, and how states' decisions affect TANF applicants and recipients. As noted earlier, respondents will be informed that their participation is voluntary and participants can elect to not answer any questions asked during the interview.

A12. Estimation of Information Collection Burden

Newly Requested Information Collections

Table 2 shows estimated burden of the information collection, which will take place within a one year period. A total of approximately 172 individuals will be interviewed, including 162 individuals interviewed during the site visits and 10 individuals interviewed through structured telephone interviews. The 162 individuals interviewed on-site include approximately 5 local TANF directors, 15 local TANF frontline staff, 5 community-based organization representatives, 137 TANF recipients or those likely eligible for assistance (112 through focus groups and 25 through individual interviews). As shown in Table 2, the total number of annual burden hours for this effort is 236. This is a one-time data collection effort.

Table 2: Total Burden Requested Under this Information Collection

Instrument	Total/Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per	Annual Burden Hours	Average Hourly Wage	Total Annual Cost

			Response			
Discussion Guide for use with state TANF directors	10	1	1.5	15	$31.61	$474
Discussion Guide for use with local TANF directors	5	1	1.5	8	$31.61	$253
Discussion Guide for use with local TANF front-line staff	15	1	1	15	$21.49	$322
Discussion Guide for use with community-based organizations	5	1	1	5	$31.61	$158
Discussion Guide for use with client focus groups	112	1	1.5	168	$7.25	$1,218
Discussion guide for use with client interviews	25	1	1	25	$7.25	$181
Estimated Annual Burden Total				**236**		**$2,607**

Total Annual Cost

The total annual cost burden to respondents for this information collection is estimated as $2,607, as shown in the last column of Table 1: Total Burden Requested Under this Information Collection. The figure is based on the mean wages for the relevant occupations ("Social and Community Services Managers;" and "Counselors, Social Workers, and Other Community and Social Service Specialists") as reported in the 2013 U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and Wage Estimates. Wage data for the client focus groups and interviews is based on the federal minimum wage as set by the U.S. Department of Labor.

A13. Cost Burden to Respondents or Record Keepers

There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government

The total cost for the data collection activities under this current request will be $272,765. This information collection request is for a one-year period.

The estimate includes the costs of information collection, design, development, tests, printing forms, editing, coding, tabulation, analysis and publication of results. Costs of salaries and travel are included. Contractual costs include the following estimates:

Contractor Task	**Cost Estimate**	**Staff Time (hours)**
Orientation Meeting	$1,712	13
Communications/Project Mgmt.	$15,040	94
Monthly Progress Reports	$3,358	27
Study Plan	$12,056	106
Info. Collection Instruments	$11,174	112
Sample/Site Selection & Recruitment Strategies	$5,472	58
OMB Package	$6,144	66
Qual. Data Collection & Quant. Analysis	$125,858	1007
Qualitative Analysis	$27,859	317
Draft/Final Report	$56, 848	467
Briefing/Dissemination	$7,244	44
Total	*$272,765*	*2,311*

A15. Change in Burden

This is a new data collection.

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

The study team estimates 2-to-3 days are needed to complete each site visit for the five site visit states. The current data collection plan covers 9 weeks; 44 business days. We believe this time gives us sufficient flexibility to conduct the number of site visits planned. Additionally, the study team is exploring the possibility of conducting multiple (two) site visits during one week by adding an additional research assistant without increasing the overall level of effort, providing further scheduling flexibility.

Site visit team members will begin coding and analysis of data soon after returning from each visit rather than waiting for completion of all visits. An addition of an extra research assistant to the study team is being considered which would also free up time for concurrent coding and analysis. Since the coding and analyses will take place immediately following the data collection efforts, it is anticipated that all coding and analyses will be completed one month following the final site visit.

Site visitors and telephone interviewers will clean their notes and develop a 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 identify key themes corresponding to the research objectives. 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.

Overlapping in part with the qualitative data collection, the study team will perform simulations and quantitative analyses. The analyses in this component will use survey data, administrative data, and microsimulation; specifically, the study team will use the TRIM3 microsimulation model, the same model that supports the TANF participation rates estimates disseminated in HHS's "Indicators of Welfare Dependence" publication. The TRIM3 analysis will include data derived from both the Current Population Survey (CPS) and the American Community Survey (ACS). The analyses under this task include the collection of data on the number of two-parent families receiving TANF-like benefits through SSF programs. OMB clearance for this analysis is not being sought because the data sources – the TRIM3 Microsimulation Model and CPS and ACS data – are currently for public use.

Based on the analysis of results in all substantive areas, the contractor will produce a final report of publishable quality by March 2016. Findings will also be presented in briefings to federal officials and staff in advance of submission of the final report.

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.