

The Exploring Measurement of Performance Outcomes and Work Requirements in Programs Promoting Economic Independence (EMPOWERED) Study

ASPE Generic Information Collection Request
OMB No. 0990-0421

Supporting Statement – Section A

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Contracting Officer's Representative

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1. Circumstances making the collection of information necessary

Background

Three federal programs providing assistance to low-income families require participants to work or participate in work-related activities as a condition of benefit receipt. The Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and public housing programs are funded, regulated, and administered by different federal agencies and each has its own eligibility criteria, program requirements, and performance priorities and metrics. Low-income families often qualify for one or more of these programs and may be subject to multiple sets of work requirement policies. The Office of the Assistant Secretary for Planning and Evaluation (ASPE) within the U.S. Department of Health and Human Services (HHS) has launched the Exploring Measurement of Performance Outcomes and Work Requirements in Programs Promoting Economic Independence (EMPOWERED) study to better understand the use of key strategies aimed at promoting self-sufficiency, including through work requirements. The EMPOWERED Study will be a collaborative effort with federal and state agencies implementing SNAP, TANF, and public housing programs – including the U.S. Department of Agriculture (USDA), HHS, and the U.S. Department of Housing and Urban Development (HUD).

Understanding how programs implement work requirement policies and provide services to participants is key to ensuring that programs can measure and track participant outcomes. How low-income program participants respond to work requirements and services makes a difference in their ability to achieve self-sufficiency. Program work requirements can deter entry and participation in public assistance programs. A large body of literature across TANF, SNAP, child support, child care subsidy programs, and Medicaid points to the association between program participation and the process to apply for and meet program requirements (Rosenberg et al. 2008; Adams and Holcomb 2006; Roberts 2005; Zedlewski and Rader 2005; DHHS-OIG 2000). Typically, the more complicated the process, the lower the participation (Rosenberg et al. 2008). Among individuals who succeed in accessing benefits, additional requirements can deter full engagement (Kirby et al. 2015; Wright and Montiel 2010).

There is limited evidence on how programs implement requirements across states, and this study will address this gap in knowledge for human services programs in three states. The proposed study will assess work requirements in the SNAP, TANF, and Public Housing programs that foster employment and promote self-sufficiency. We are requesting OMB approval for this data collection using the Generic Information Collection mechanism through ASPE – OMB No. 0990-0421. This supporting statement describes the qualitative analysis that is the subject of this request. Mathematica Policy Research has been contracted by ASPE to collect and analyze the qualitative data. Data will be collected from staff acting in their official capacities who are involved in developing, implementing, and

overseeing work requirement policies in TANF, SNAP, and public housing programs in three selected states – Florida, Minnesota, and Mississippi.

The data collection instrument is a semi-structured discussion guide (**see Attachment A – Master Discussion Guide**) designed to help facilitate in-person interviews with state program administrators, local-level staff, and, where applicable, employment and training (E&T) providers. The semi-structured master discussion guide is written to inspire free-flowing conversation. To minimize burden, we have designed the guide to facilitate 60-minute individual interviews and 90-minute small-group (two- to three-person) interviews. The guide includes questions about program administration and policy context, expectations for work requirements and outcomes, implementation of work requirement policy – including assessing eligibility, assigning participants to work, and administering sanction policy – and data tracking and use.

The master discussion guide will be used to conduct all interviews. Not all questions will be asked of all respondents, but rather the interviewer will select questions based on the type of respondent and the respondent’s specific job responsibilities. Respondent types will include staff from state agencies (directors, policy staff, staff monitoring work requirements, and data managers), local or regional offices (directors, supervisors, program eligibility staff, and case managers), and, where applicable, E&T providers (directors and staff delivering services). The categories of questions included in the master discussion guide will include the following:

- Background information on each respondent
- State and local area context
- Work requirement policy motivation and goals
- Target populations and exemptions
- Assessing eligibility for work requirements
- Work support services to meet work requirements
- Noncompliance determination and sanction policies
- Program oversight and communication
- Data tracking and outcomes
- Perceived effectiveness of programs
- Lessons and best practices

We will tailor questions in the master discussion guide for the respondent type using a chart that marks the relevant questions for each respondent type.

2. Purpose and use of the information collection

Our data collection is intended to produce formative research that will advance efforts to improve coordination of work requirements between agencies. Semi-structured interviews with various types of staff in selected sites are key to understanding the nuances of how policies evolve into practice, and how policies operate.

The semi-structured interview guide (included in Attachment A) will allow the interview questions to be tailored to the respondent based on their organization and role. Not all questions will be asked of all respondents, and interviewers will ensure they use the program names, acronyms, and terminology that is appropriate for each respondent to understand the questions that are asked.

After collecting and documenting qualitative data, we will prepare a memo summarizing the data collection efforts. Prepared for ASPE's internal use, the memo will describe how we collected the data and what data were collected. It will also briefly summarize findings for key topics identified during our interviews.

Program and service provider staff will be notified that the information they provide will not be released in a form that identifies them, except as otherwise required by law. No identifying information will be attached to any reports or data supplied to ASPE or any other researchers.

When the results are reported, data will be presented only in aggregate form, so that individuals and institutions will not be identified. A statement to this effect will be included in the master discussion guide. All data will be kept electronically, and access will be limited to specific users on the research team. All employees take an annual security training, and employees must notify their supervisor, the project director, and the Mathematica security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner. These staff will take the proper actions to respond to the security incident.

3. Use of improved information technology and burden reduction

Not applicable.

4. Efforts to identify duplication and use of similar information

To the extent possible, ASPE collaborates with internal and external partners to ensure there is no duplication of information collected, and to the extent of our knowledge there are no similar data that are being collected. ASPE typically looks at cross-cutting issues that may involve several agencies within HHS to provide a departmental view and coordination. To the maximum extent possible, we have made use of previous information by reviewing results of previous qualitative research projects on relevant issues as we developed interview guides, questionnaires, and other tools sought under this approval.

5. Impact on small businesses or other small entities

No small businesses will be involved in this data collection.

6. Consequences of collecting the information less frequently

This request is for a one-time data collection. Staff participation in qualitative interviews is voluntary. Data for the study will be collected in 2018 from state agency staff, local agency and office staff, and E&T provider staff, where applicable.

7. Special circumstances relating to the guidelines of 5 CFR 1320.5

There are no special circumstances with this information collection package. This request fully complies with the regulation 5 CFR 1320.5 and will be voluntary.

8. Comments in response to the *Federal Register* notice and efforts to consult outside the Agency

This data collection is being conducted using the Generic Information Collection mechanism through ASPE – OMB No. 0990-0421.

9. Explanation of any payment or gift to respondents

ASPE will not provide payments or gifts to respondents.

10. Assurance of confidentiality provided to respondents

The Privacy Act does not apply to this data collection. State and local administrators and practitioners who answer questions will be answering in their official roles and will not be asked about, nor will they provide, sensitive individually identifiable information.

11. Justification for sensitive questions

No information will be collected that are of personal or sensitive nature.

12. Estimates of annualized burden hours and costs

The estimate for burden hours is based on our plan for semi-structured interviews lasting up to 60 minutes for an individual or 90 minutes for a small group using the master discussion guide. For the purposes of estimating burden hours, we use the upper limit of this range (90 minutes). The semi-structured interview guide will allow the interview questions to be tailored to the respondent based on their organization and role. Not all questions will be asked of all respondents.

Estimates for the average hourly wage for respondents are based on the U.S. Department of Labor (DOL) National Compensation Survey estimate for management occupations – medical and health services managers in state government (<http://www.bls.gov/ncs/ocs/sp/nctb1349.pdf>). Based on DOL data, average hourly wages are estimated for all 186 number respondents. Table A-1 shows estimated burden and cost information.

Table A-12: Estimated annualized burden hours and costs to respondents

Type of respondent	Number of respondents	Number of responses per respondent	Average burden per response (in hours)	Total burden hours	Hourly wage rate	Total respondent costs
State administrators	36	1	1.5	54	37.06	\$ 2,001.24

Local administrators	18	1	1.5	27	34.50	\$ 931.50
Local staff	108	1	1.5	162	17.26	\$ 2,796.12
E&T provider staff	24	1	1.5	36	22.71	\$ 817.56
TOTALS	186			279		\$ 6,546.42

Source: U.S. Department of Labor (DOL) National Compensation Survey

13. Estimates of other total annual cost burden to respondents or record keepers

There will be no direct costs to the respondents other than their time to participate in each data collection.

14. Annualized cost to the government

Table A-2: Estimated annualized cost to the federal government

Staff (full-time equivalent)	Average hours per collection	Average hourly rate	Average cost
Social Science Analyst, GS [13]	[20]	[\$46.46]	[\$929]
Social Science Analyst, GS [13]	[20]	[\$46.46]	[\$929]
Estimated Total Cost of Information Collection			[\$1858.4]

15. Explanation for program changes or adjustments

This is a new data collection.

16. Plans for tabulation and publication and project time schedule

After collecting the qualitative data, we will prepare a memo summarizing the data collection efforts. The memo will describe how we collected the data and what data were collected, as well as briefly summarize findings for key topics identified during our interviews. Table A-3 presents the project time schedule.

We will summarize findings from the study of work requirements in an internal report for ASPE's use. The report will include a national summary of literature and documentation on the implementation of work requirements across key programs and a description of the implementation of work requirements in the three selected states based on our data collection.

Table A-3: Project time schedule

Task	Timeline
• Final instrument design and data collection plan	• Pending approval from the Office of Management and Budget
• Draft memo on data collection	• August 10, 2018
• Final memo on data collection	• September 7, 2018 (or two weeks after receiving comments)
• Draft report outline	• September 21, 2018

• Final report outline	• October 12, 2018
• Draft report	• November 23, 2018
• Final report	• December 28, 2018 (or two weeks after receiving comments)

17. Reason(s) display of Office of Management and Budget expiration date is inappropriate

We are requesting no exemption.

18. Exceptions to certification for Paperwork Reduction Act submissions

There are no exceptions to the certification. These activities comply with the requirements in 5 CFR 1320.9.

References

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Roberts, Paula. "Child Support Cooperation Requirements and Public Benefits Programs: An Overview of Issues and Recommendations for Change." Washington, DC: Center for Law and Social Policy, November 2005.

Rosenberg, Linda C., Michelle Derr, Donna Pavetti, Subuhi Asheer, Megan Hague Angus, Samina Sattar, and Jeffrey Max. "A Study of States' TANF Diversion Programs." Princeton, NJ: Mathematica Policy Research, December 8, 2008.

Wright, David J., and Lisa M. Montiel. "Workforce System One-Stop Services for Public Assistance and Other Low-Income Populations: Lessons Learned in Selected States." Report submitted to the U.S. Department of Labor, Employment and Training Administration. Albany, NY: Nelson A. Rockefeller Institute of Government, April 2010.

Zedlewski, Sheila R., and Kelly Rader. "Have Food Stamp Program Changes Increased Participation." *Social Service Review*, September 2005.

LIST OF ATTACHMENTS – Section A

Attachment A: Master Discussion Guide