Procedural Justice-Informed Alternatives to Contempt Demonstration (PJAC)

OMB Information Collection Request
0970 - 0505

Supporting Statement

Part A

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Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a revision. We are requesting three years of approval.

- **Progress to Date:** Information collection related to the Procedural Justice-Informed Alternatives to Contempt Demonstration (PJAC) was initially approved January 2018. About 8,700 noncustodial parents have been randomly assigned into the PJAC study sample since February 2018, nearly two-thirds of the way to the study goal of 13,800. Collection of baseline data (Instrument 1) and data on service receipt (Instrument 2) is ongoing. The first of two planned rounds of implementation visits to each participating study site is complete, during which interviews with child support project directors, case managers, and external supportive service partners took place (Instrument 3).

- **Timeline:** Due to the three-year study enrollment period and one-year follow-up period, the data collection timeline extends beyond the current expiration date of January 31, 2021. As described in the initial approval, we are requesting an extension for previously approved materials. We expect study enrollment will conclude in early 2021 and participant follow-up will conclude in early 2022.

- **Previous Terms of Clearance:** N/A

- **Summary of changes requested:** We are requesting approval of four additional instruments. These instruments will facilitate data collection that will inform the implementation and benefit-cost study components of the PJAC evaluation. The new instruments included in this package are:
    - Instrument 4: Noncustodial Parent Participant Interview Protocol,
    - Instrument 5: Staff Survey,
    - Instrument 6: Staff Time Study, and
    - Instrument 7: Custodial Parent Interview Protocol.

  Additional changes to this project since the initial submission include:

  1. Lowering the overall sample size target from 18,000 to 13,800 since lower sample sizes provide sufficient statistical power and will lessen enrollment burden on sites. (Analysis in support of this assertion can be found in section B2 of Supporting Statement B.)

  2. Eliminating a noncustodial parent participant survey that was referenced as forthcoming in the prior approval package. This is being eliminated in favor of expanding noncustodial parent participant interviews, thus also requiring revisions to the noncustodial parent participant interview protocol that was approved in topic guide form by OMB on 1/23/2018. This decision was made due to concerns about achieving a high enough response rate and minimal bias to use survey data in an impact analysis.

  These changes significantly reduced the overall burden required for this project.

We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivity:** The PJAC demonstration grants end in September 2021. The proposed information collection activities will require up to a year to complete and it is critical that the research team is able to collect these data before grantees begin winding down services towards the end of the 5-year grant period so that the data collected reflect fully operational PJAC programs. Therefore, we are hoping to receive OMB approval by late March 2020.

Alternative Supporting Statement for Information Collections Designed for Research, Public Health Surveillance, and Program Evaluation Purposes

A1. Necessity for Collection

Section 1115 of the Social Security Act (42 U.S.C. 1315) authorizes funds for experimental, pilot, or demonstration projects that are likely to assist in promoting the objectives of Part D of Title IV. The Procedural Justice-Informed Alternatives to Contempt Demonstration (PJAC)project has been funded through Section 1115 funds, which also require the Secretary to release an evaluation of each demonstration project that has received funding.[1]

Pursuant to 42 U.S.C 1315(e)(5), the Administration for Children and Families (ACF) Office of Child Support Enforcement (OCSE) published a written requirement for a program evaluation of the PJAC demonstration in Funding Opportunity Number: HHS-2016-ACF-OCSE-FD-1171. The funding opportunity requiring the evaluation was awarded on September 29, 2016.

A2. Purpose

Purpose and Use

The purpose of the PJAC demonstration project is to assess the feasibility and efficacy of incorporating principles of procedural justice into child support services as a cost-effective alternative to civil contempt proceedings. Procedural justice is sometimes referred to as procedural fairness. Very simply, it is "the idea that how individuals regard the justice system is tied more to the perceived fairness of the *process* and how they were treated rather than to the perceived fairness of the *outcome*."[2] Studies conducted on criminal and civil legal proceedings, including family law, show that when individuals believe the process was fair, they are more likely to accept decisions made by courts and other public authorities and are more willing to comply in the future.[3]

Focusing on procedural justice strategies in the child support program may result in a parent paying child support reliably if he or she feels that the outcome is arrived at fairly. Reliable payments can lead to other favorable outcomes for the parent, including a reduction in potential arrears, avoidance of contempt proceedings, and improved relationships with the custodial parent and child(ren). Research shows that procedural justice is "effective in both creating positive dynamics within families and in facilitating long-term adherence to agreements."[4] Perhaps most interesting to OCSE is the finding that studies show trust and confidence in legal authorities increases when people experience procedural justice, despite receiving less desirable outcomes.[5] The PJAC intervention incorporates the five key elements of procedural justice:

- **Voice and Participation** – the parents' perception that they have had the opportunity to tell their side of the story and that the decision-maker has taken the story into account in making the decision;

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[1]See https://www.ssa.gov/OP_Home/ssact/title11/1115.htm for additional information.

[2]Bradley, E. G. (2013, September). *The Case for Procedural Justice: Fairness as a Crime Prevention Tool.* Retrieved from Community Policing Dispatch: http ://cops .usdoj.gov /html /dispatch /09 -2013 /fairness_a s_a_crime_prevention tool .asp

[3]Tyler, T. R. (2007). Procedural Justice and the Courts. *Court Review: The Journal of the American Judges Association*, *Volume 44*, *Issue 1/2*. http://digitalcommons.unl.edu/cgi/viewcontent.cgi?article=1254&context=ajacourtreview.

[4]Ibid.

[5]Tyler, T. R., & Fagan, J. (2008). Legitimacy And Cooperation: Why Do People Help the Police Fight Crime in Their Communities? *Ohio State Journal of Criminal Law 231-275*, 6.

- **Neutrality of the Process** – the parents' perception that the decision-making process is unbiased and trustworthy;
- **Respect –** the parents' perception that the child support program treats them with dignity;
- **Understanding** – the parents' perception that they understand the process and how decisions are made;
- **Helpfulness** – the parents' perception that the child support program is interested in their personal situation to the extent the law allows.

The service contrast between noncustodial parents receiving PJAC services and those receiving business-as-usual child support services is immediate. Although the exact process varies dependent on the participating jurisdiction, the key differences are summarized in the table below:

Business-as-usual Child Support Services	PJAC Services
• Parents receive automated notice of contempt of court, identifying the time and date of the court hearing • Parents who appear in court and will be given a chance to pay their arrears, agree to a payment plan, or will be held in contempt and be subject to jail • Parents who do not appear before the court will have a bench warrant issued for their arrest	• Parents assigned to a PJAC-trained case manager • Guided by the five procedural justice elements listed above, the case manager: o Completes detailed review of case notes, o Conducts personal outreach to both parents, o Conducts domestic violence screening o Schedules an in-person case conference with both parents when appropriate; and o Provides one-on-one case management services.

The PJAC Demonstration will add to the evidence base on innovations in child support practices by evaluating PJAC's impacts and determining whether the benefits of PJAC services exceed their costs. The PJAC Evaluation includes three key components: an implementation study, an impact study, and a benefit-cost study. The information generated by the study may be used by a variety of parties in their efforts to increase support for children served by the child support program while managing program and court costs. For example, OCSE and state and tribal IV-D directors may use the demonstration findings to assess whether additional investments should be made in incorporating procedural justice into child support business practices. Study findings may also inform future studies in this area.

The information collected is meant to contribute to the body of knowledge on ACF programs. It is not intended to be used as the principal basis for a decision by a federal decision-maker and is not expected to meet the threshold of influential or highly influential scientific information.

Research Questions or Tests

The evaluation includes three components: an implementation study, impact study, and benefit-cost study. The three overarching research questions for the PJAC demonstration are:

1. How was PJAC designed and implemented? *(primary research question for the implementation study)*
2. What impact did PJAC have on service receipt, enforcement actions, contempt proceedings, child support payments, and jail stays relative to what would have happened in the absence of the intervention? *(primary research question for the impact study)*
3. To what extent do PJAC's costs differ from those expended on behalf of individuals randomly assigned to a control group that did not receive PJAC program services (net cost)? How does the

net cost compare with the net benefits associated with the program's impacts? *(primary research questions for the benefit-cost study)*

Study Design

The PJAC study is designed to examine the approaches taken by six child support agencies that received grants to provide procedural justice-informed services to noncustodial parents who have been determined able to pay their child support but are far enough behind in payments that they are eligible for contempt. The study will also examine the impacts of those approaches on the outcomes they are designed to address, as well as the benefits and costs of PJAC services.

The **implementation study** will describe the design and delivery of PJAC services, allowing PJAC to be replicated in other settings if the impact study shows evidence that the intervention is effective. The key components of the implementation study are participant baseline characteristics (Instrument 1); data on service receipt from the PJAC management information system (Instrument 2); interviews with child support programs directors, case managers, external supportive service providers (Instrument 3), noncustodial parents (Instrument 4), and custodial parents (Instrument 7); and staff survey data (Instrument 5).

The **impact study** uses a random assignment design to provide the strongest possible evidence regarding the efficacy of the PJAC intervention to improve key outcomes such as reliable child support payments and decreased use of contempt proceedings. The impact study will test the effectiveness of a comprehensive, multi-component intervention, and will not attempt to isolate the comparative effectiveness of the intervention's components. The target population for this study are those noncustodial parents who have been determined to able to pay child support yet have neglected this obligation to the point of contempt proceedings being initiated by the child support agency. Noncustodial parents who have been determined to be unable to pay their child support are not eligible for the study. Approximately 13,800 noncustodial parents will be randomly assigned over the three-year enrollment period to either be offered PJAC services (the treatment group) or to follow the business-as-usual practice of beginning contempt proceedings (the control group).

Noncustodial parents (NCPs) are randomly assigned to either the treatment or the control group at the point of contempt procedures being initiated against a noncustodial parent for a particular child support case.[6] Specially trained PJAC case managers assume responsibility for treatment group members' child support cases. As part of this design, PJAC case managers have caseloads about 70 percent smaller, on average, than business-as-usual case managers. Upon being assigned a new NCP, PJAC case managers will conduct in-depth reviews of each of their cases, outreach and engagement activities, and intensive case management; each of these are infused with the elements of procedural justice, as case managers work with parents to address their reasons for nonpayment. Control group members will receive business-as-usual services via regular child support enforcement workers, which entails entering the civil contempt process and generally receiving automated, legalistic communications

[6]If a noncustodial parent has more than one child support case, all of their cases receive the same research group assignment. That is, if the presenting case for which they were randomly assigned received a PJAC treatment group assignment, all of their cases will receive PJAC services. If the presenting case for which they were randomly assigned received a control group assignment, all of their cases will proceed with business-as-usual child support services.

and interactions as they are compelled to make payments through the legal system. Treatment and control group outcomes will be compared using administrative data (discussed below).

The **benefit-cost study** will compare the potential monetary benefits of PJAC services (as measured through the impact study) to the costs of PJAC service delivery to assess whether the intervention is cost efficient. Benefits and costs will be calculated from the noncustodial parent, custodial parent, government, and societal perspectives. A key component of the benefit-cost study is data on child support staff time allocations from the staff time study (Instrument 6).

The three study components together will provide practitioners and policymakers with detailed evidence regarding how procedural justice-informed services can be implemented in other local child support agencies/contexts, whether they are an effective alternative to contempt proceedings, whether their benefits exceed their costs, and how they can be replicated in additional child support agencies if warranted.

The frequency and duration of data collection for the PJAC evaluation is summarized in the table below:

Overview of Data Collection Activities

Instrument/Data Collection Activity	*Respondents, Content, Purpose of Collection*	*Mode, Frequency, and Duration*
Previously Approved Request (Approved in January 2018)		
Instrument 1: Staff data entry on participant baseline information	**Respondents:** Administrative child support staff **Content:** Background NCP and case characteristics **Purpose:** Create PJAC treatment and control groups, collect information to be used as descriptive information for implementation study and potential subgroup indicators and covariates for impact study	**Mode:** Web-based MIS **Frequency:** Ongoing **Duration:** 3 minutes
Instrument 2: Study MIS to track receipt of services	**Respondents:** PJAC child support case managers **Content:** Contacts, outreach efforts, enhanced investigation, PJAC services, child support services, supportive service referrals **Purpose:** To describe receipt of services among PJAC treatment group enrollees for implementation study	**Mode:** Web-based MIS **Frequency:** Ongoing **Duration:** 1 hour
Instrument 3: Staff and community partner interview topic guide	**Respondents:** PJAC child support project directors and case managers, control group project directors and case managers, community partners **Content:** Staff background and characteristics; program planning and design; local context and service environment; study enrollment;	**Mode:** In-depth semi-structured interviews; one in-person round and one virtual round **Frequency:** Two rounds of visits with each study, one

Instrument/Data Collection Activity	*Respondents, Content, Purpose of Collection*	*Mode, Frequency, and Duration*
	implementation of PJAC and business-as-usual elements; participation; study agency organizational characteristics; partner agencies providing support services **Purpose:** Key data source to address primary research question for implementation study	in early 2019 and one in 2020 **Duration:** 1 hour
Current Request		
Instrument 4: Noncustodial parent participant interview protocol	**Respondents:** Noncustodial parents in PJAC treatment and control groups **Content:** Participant characteristics; general beliefs about child support; experiences with child support; experiences with PJAC (treatment group only); perceptions of child support; perceptions of coronavirus pandemic's effect on participants' lives **Purpose:** Obtain participant perspective; qualitative assessment of effect of procedural justice on participant experiences with/perceptions of child support program for implementation study	**Mode:** In-depth semi-structured interviews **Frequency:** One-time collection **Duration:** 1 hour
Instrument 5: Staff survey	**Respondents:** PJAC treatment and control group case managers **Content:** Staff background and caseload characteristics; supervision, training, and technical assistance; views on child support agency; procedural justice; job satisfaction and stress **Purpose:** Collect quantitative information from staff to inform implementation study	**Mode:** Web-based survey tool **Frequency:** One-time collection **Duration:** ½ hour
Instrument 6: Staff time study	**Respondents:** PJAC project directors and case managers, control group project directors and case managers **Content:** Time allocation among enforcement activities, other activities, and leave **Purpose:** Calculate net costs of PJAC services for benefit-cost study	**Mode:** Web-based survey tool **Frequency:** One-time collection; time use to be entered daily over two-week period **Duration:** 1.5 hours
Instrument 7: Custodial parent interview protocol	**Respondents:** Custodial parents associated with PJAC treatment and control group members **Content:** Custodial parent characteristics; general beliefs about child support; experiences with child support; experiences with PJAC (treatment group	**Mode:** In-depth semi-structured interviews **Frequency:** One-time collection

Instrument/Data Collection Activity	*Respondents, Content, Purpose of Collection*	*Mode, Frequency, and Duration*
	only); perceptions of child support; perceptions of coronavirus pandemic's effect on custodial parents' lives **Purpose:** Obtain custodial parent perspective; qualitative assessment of effect of procedural justice on custodial parent experiences with/perceptions of child support program for implementation study	**Duration:** 1 hour

Possible limitations of this study design include (1) unreliable administrative data, as the impact study relies primarily on administrative child support records that often suffer from data quality issues since they are collected for program administration purposes rather than for research purposes; (2) a potential confounding effect in that PJAC case managers volunteered or were specially identified to take part in the PJAC training, thus they may be inherently different than caseworkers who work with control group parents and could serve as the driver of potential impacts rather than the set of procedural justice-informed services themselves; (3) the inability to determine receipt of external supportive services (for example, employment supports, mental health and substance abuse treatment, parenting programs) among control group members, hindering the accuracy of an estimate of net PJAC service costs (the cost of PJAC services less the cost of control services) and thus limiting the benefit-cost study; and (4) challenges engaging treatment group members in PJAC services given the hard-to-reach population targeted by the study (by definition, since to be eligible a parent had to be nonresponsive/at the point of a civil contempt filing), thus limiting participants' dosage of the intervention and potentially affecting results. It should be noted that future child support programs attempting to implement PJAC services will face the same difficulties engaging treatment group members given the nature of the intervention's target population. For this reason, the implementation study is documenting what strategies the current programs found to be effective in their efforts to overcome this challenge. This evaluation is intended to produce internally-valid estimates of the intervention's causal impact on noncustodial parents who have met their state's criteria for referral to civil contempt proceedings for failure to meet their child support obligations. The evaluation is not intended to promote statistical generalization to other sites or service populations. Limitations will be described when disseminating study findings, as appropriate.

Other Data Sources and Uses of Information

This data collection will be used in concert with three administrative data sources: child support records (on participant characteristics, case characteristics, orders, arrears, child support services, enforcement actions, contempt proceedings, and payments) obtained from each participating child support agency; employment and earnings records obtained from the National Directory of New Hires (NDNH); and jail records to be obtained from the local county jail in one study site (most likely Maricopa County in Arizona) as a case study.

Child support records will be the primary impact data source used to assess the effectiveness of the PJAC intervention on key outcomes. NDNH employment and earnings records will be used primarily to create subgroups and covariates for the impact analysis. Jail records will be used in the impact analysis

for the case study site. The implementation study described above will help to contextualize and interpret impact findings and, in some cases, provide data to inform the benefit-cost study. The impact estimates produced by the impact analysis will also be used in the benefit-cost study. Thus, all data collection will be compiled, integrated, and synthesized to address the three key evaluation research questions.

A3. Use of Information Technology to Reduce Burden

PJAC case managers in the demonstration sites use the study management information system (MIS) to conduct random assignment (including entering noncustodial parents' baseline information) and collect data on baseline characteristics (Instrument 1) and receipt of services (Instrument 2). The MIS is a web-based application providing easy user access while maintaining strict data security. Users are assigned their own user account, including a user ID and password. The system was designed to reduce data collection and maintenance burden. It is flexible, easy-to-use, and includes helpful tools, reports, and reminders to reduce burden and increase the quality and quantity of data collected.

Staff time study data collection (Instrument 6) will be administered via a web-based survey platform that will be completed by PJAC treatment and control group project directors and case managers.

The staff survey (Instrument 5) will be administered via a web-based survey platform. Web-based surveys offer many benefits to reduce burden; for example, they pre-fill data and employ skip patterns that reduce the number of items respondents are exposed to, as compared with paper surveys.

All interviews (Instruments 3, 4, and 7) will be recorded when consent is provided. This will reduce burden because it improves notetaking and reduces the need for interviewers to request that interviewees repeat information.

A4. Use of Existing Data: Efforts to reduce duplication, minimize burden, and increase utility and government efficiency

The PJAC evaluation will not require the collection of information that is reliably available from alternative data sources. None of the instruments will ask for information that can be obtained through administrative data collection, with one exception: Some of the items included in the random assignment data entry protocol (Instrument 1) are available in administrative child support data.[7] The study MIS will gather information about program participation not typically collected by child support programs, for instance, information specific to PJAC services. The study team also aims to avoid asking study participants or child support staff members for the same information more than once, except in cases where information is needed to confirm a respondent's identity or the accuracy of data collected via another source. For example, study participants will not be asked during semi-structured interviews

[7] Though some items are available elsewhere, it is vital that these data elements be captured at the point of random assignment so they can be used as potential covariates or subgroup indicators in the impact analysis. Thus, they cannot be changed, filled in, or updated post-random assignment as this would introduce bias. For this reason, the evaluation team selected a small number of key elements and requires that these items be entered by staff at the time of study enrollment (via Instrument 1) rather than relying on administrative data provided later to ensure these elements are captured as of the point of random assignment.

any questions about the number of child support cases or their employment histories as that information is accessible via administrative child support and employment and earnings records, respectively.

A5. Impact on Small Businesses

No small businesses are expected to be involved in information collection. Nonetheless, instruments have been tailored to minimize burden and collect only critical information.

A6. Consequences of Less Frequent Collection

Each of the new instruments submitted under this OMB package constitute one-time data collections that are designed to obtain the necessary information in the least burdensome way possible.

A7. Now subsumed under 2(b) above and 10 (below)

A8. 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 May 13, 2019, Volume 84, Number 92, pages 20891-20893, and provided a 60-day period for public comment. A copy of this notice is attached as Attachment A. During the notice and comment period, no comments were received.

Consultation with Experts Outside of the Study

The following two experts in child support were consulted regarding the overall evaluation design as well as the contents of each of the information collection instruments:

Dr. Dan Meyer
University of Wisconsin-Madison
School of Social Work
1350 University Ave.
Madison, WI 53706

Linda Mellgren
Office of the Assistant Secretary for Planning and Evaluation, HHS (retired)
245 11th Street SE
Washington, DC 20003

A9. Tokens of Appreciation

We propose offering tokens of appreciation to individual respondents for completing the one-hour, in-depth noncustodial parent participant interview (Instrument 4) and custodial parent interview (Instrument 7) in the form of a $40 gift card. Without offsetting the direct costs incurred by respondents for participating in the interviews, such as arranging child care, transportation, or time off from paid work, the research team increases the risk that only those individuals able to overcome the financial barriers to participate will agree to an interview. Participants will receive a $40 gift card to account for incidental expenses such as transportation and/or childcare that may otherwise prevent their participation in the study. Interview data are not intended to be representative in a statistical sense, in that they will not be used to make statements about the prevalence of experiences in the PJAC population. However, it is important to secure participants with a range of background characteristics in order to capture a variety of possible experiences with PJAC services and the experiences that control group members have with business-as-usual services

A10. Privacy: Procedures to protect privacy of information, while maximizing data sharing

Personally Identifiable Information

Previously approved Instrument 1: Staff Data Entry on Participant Baseline Information includes personally identifiable information in the form of participant social security number, which will be used to match to the National Directory of New Hires database to acquire employment and earnings records.

Most interviews (excepting those for which the respondent does not provide consent) will be recorded; these voice recordings constitute personally identifiable information (Instruments 3, 4, and 7). Encrypted recorders will be used for all interviews; recordings will be transferred onto MDRC's secure network (see *Data Security and Monitoring)* as soon as a secure connection is available.

Information will not be maintained in a paper or electronic system from which data are actually or directly retrieved by an individuals' personal identifier.

Assurances of Privacy

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 evaluation contractor, MDRC, will comply with all federal and departmental regulations for private information. Other data collected and used in this study will come from administrative data covered by the PJAC project's waiver of informed consent (issued by the MDRC IRB), and data collected for program use.

Data Security and Monitoring

MDRC's computer facilities are designed to be available whenever needed, be secure, meet current and future computing needs, and do so while maintaining strict authentication and access controls that promote the protection of data through physical and virtual security, access, separate storage, and encryption at rest. All data are backed up daily or more frequently if required (up to five times a day). MDRC's private network is secure and protected by Amazon Web Services infrastructure. Their cloud enterprise storage is built with high availability, 256-bit encryption, and automated storage snapshots.

The local and wide area networks (LAN and WAN) are based on Cisco and other manufacturers enterprise design and equipment. These include firewalls, intrusion detection and protection systems, web filtering, and specialized A.I. for cyber defense (DarkTrace).

Transmission of data is done securely. MDRC utilizes FedRAMP authorized solutions such as BOX to transfer data. End-to-end encryption is automatically implemented and complies with FIPS-140. All MDRC staff, subcontractors, and consultants, sign an MDRC Confidentiality Pledge to comply with corporate policies on data security and confidentiality and completed required data security trainings annually.

MDRC will retain data until one year after the completion of the evaluation and at that time MDRC will destroy the data.

Previous request:

Instrument 1: Staff data entry on participant baseline information and **Instrument 2: Study MIS to track receipt of services.** Child support staff enter data for both Instrument 1 and Instrument 2 directly into the PJAC MIS. The PJAC MIS is accessed by account holders through a password-protected login requiring 16-character alphanumeric passwords that must be changed every 30 days. The PJAC MIS provides encryption at rest and maintains private data in a highly secure environment.

Instrument 3: Staff and community partner interview topic guide. When interviewee consent is granted, interviews (whether in-person or virtual) are recorded using encrypted devices for backup purposes. All notes taken exclude PII and are typed on encrypted laptops whenever possible; if paper notes are required, they will be transferred to electronic form as soon as practicable and paper notes will be securely destroyed. Notes and interview recordings will be securely transferred into MDRC's private network via BOX as soon as a trusted, private internet connection is available.

Current request:

Instrument 4: Noncustodial Parent Participant Interview protocol and **Instrument 7: Custodial Parent Interview Protocol**. When interviewee consent is granted, interviews will be recorded on encrypted recorders for backup purposes. All notes taken will exclude PII and be typed on encrypted laptops whenever possible; if paper notes are required, they will be transferred to electronic form as soon as practicable and paper notes will be securely destroyed. Notes and interview recordings will be securely transferred into MDRC's private network via BOX as soon as a trusted, private internet connection is available.

Instrument 5: Staff survey. Staff survey responses will be collected via Qualtrics, a web-based FedRAMP authorized software package in which data will be protected meeting federal government FISMA moderate standards. Data will be exported from Qualtrics into a CSV format and securely transferred into MDRC's private network via BOX.

Instrument 6: **Staff time study.** Time study data will also be collected via Qualtrics. Data will be exported from Qualtrics into a CSV format and securely transferred into MDRC's private network via BOX.

A11. Sensitive Information [8]

Instrument 1: Staff data entry on participant baseline information requires PJAC study site staff to enter participant social security numbers into the study MIS. This is necessary to build a sample with unique identifiers so that administrative data, including National Directory of New Hires (NDNH) records, can later be requested using the identifying information. No other identifiers would allow for a match to NDNH data. The study has obtained a waiver of informed consent from the MDRC IRB for this data collection activity (see Attachment B: MDRC IRB Approval Letter); these data are protected by the conditions agreed to in applicable data sharing agreements between MDRC and the grantee sites.

None of the other instruments in this OMB submission include sensitive questions.

A12. Burden

Explanation of Burden Estimates

Remaining Burden for Previously Approved Instruments

Instrument 1: Staff data entry on participant baseline information. Across the six PJAC study sites, there are 50 administrative child support staff members enrolling noncustodial parents into the study and thus entering participant baseline information into the PJAC MIS. Currently, 5,100 additional noncustodial parents must be enrolled to meet the cross-site study sample size target of 13,800. Each entry is estimated to take .05 hours for a total burden of 255 hours (50 respondents*102 responses each*.05 hours per response). Annualized over three years, this calculates to 85 hours of annual burden.

Instrument 2: Study MIS to track receipt of services. Across the six PJAC study sites, there are 30 child support staff members tracking treatment group members' receipt of services in the study MIS. We estimate that about 6,000 treatment group members (of a projected total of 8,970) still require MIS data tracking. Each response is estimated to take an average of one hour for a total burden of 6,000 hours (30 respondents*200 responses each*1 hour per response). Annualized over three years, this calculates to 2,000 hours of annual burden.

Instrument 3: Staff and community partner interview topic guide. The research team plans to interview about 150 PJAC and control group project directors, case managers, and community partners across the six PJAC study sites (25 per site) in the remaining set of implementation virtual interviews. Each interview is estimated to take one hour for a total burden of 150 hours (150 respondents*1 response each*1 hour per response). Annualized over three years, this calculates to 50 hours of annual burden.

Burden for New Instruments

[8] Examples of sensitive topics include (but not limited to): social security number; sex behavior and attitudes; illegal, anti-social, self-incriminating and demeaning behavior; critical appraisals of other individuals with whom respondents have close relationships, e.g., family, pupil-teacher, employee-supervisor; mental and psychological problems potentially embarrassing to respondents; religion and indicators of religion; community activities which indicate political affiliation and attitudes; legally recognized privileged and analogous relationships, such as those of lawyers, physicians and ministers; records describing how an individual exercises rights guaranteed by the First Amendment; receipt of economic assistance from the government (e.g., unemployment or WIC or SNAP); immigration/citizenship status.

Instrument 4: Noncustodial parent participant interviews and **Instrument 7: Custodial parent interviews.** The research team hopes to obtain a total of 180 interviews with participants (NCPs) and 180 interviews with custodial parents (CPs). The team will attempt to complete 30 NCP participant interviews and 30 CP interviews in each of the six participating PJAC sites. For both the 30 NCP participant interviews and 30 CP interviews, 20 will be associated with the PJAC treatment group and 10 associated with the control group. Each respondent will complete the interview just once, with a completed interview taking approximately one hour, for a total burden of 180 hours for each instrument (180 respondents*1 response each*1 hour per response). Annualized over 3 years, this calculates to 60 hours of annual burden each for Instruments 4 and 7.

Instrument 5: Staff survey. Ten child support caseworkers (5 PJAC caseworkers, 5 control group caseworkers) in each of the six PJAC study sites will complete the staff survey, for a total of 60 respondents. Each will complete the staff survey once, with the survey estimated to take about 30 minutes, for a total burden of 30 hours (60 respondents*1 response each*0.5 hours per response). Annualized over three years, this calculates to 10 hours of annual burden.

Instrument 6: Staff time study. A target of 15 child support project directors and case managers (including both those serving PJAC treatment group members and those serving control group members), will complete the staff time study at each of the 6 study sites for a total of 90 respondents. Respondents will be required to allocate the time they spent each day across several pre-specified categories for a two-week period. This collection will occur only once and is anticipated to take about 1.5 hours per person in total, for a total burden of 135 hours (90 respondents*1 response each*1.5 hours per response). Annualized over 3 years, this calculates to 45 hours of annual burden.

Estimated Annualized Cost to Respondents

Staff data collection. We estimate the average hourly wage for staff at the child support agencies to be the average hourly wage of "social and community service managers" (11-9151) taken from the U.S. Bureau of Labor Statistics, National Compensation Survey, 2018 ($34.46).[9] The estimated total annual cost to respondents is $2,929 to complete Instrument 1, $68,920 to complete Instrument 2, $1,723 to complete Instrument 3, $345 to complete Instrument 5, and $1,551 to complete Instrument 6.

Participant and custodial parent data collection. The average hourly wage estimate for participants was calculated as the average current minimum wage across sites (AZ = $11/hour, CA = $12/hour, MI = $9.45/hour, OH = $8.55, VA = $7.25). This approach resulted in an estimated hourly wage of $9.47. The estimated total annual cost to respondents of Instruments 4 and 7 is $568 for each instrument.

[9] https://www.bls.gov/oes/current/oes119151.htm

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Respondent Cost
Remaining Burden for Previously Approved Instruments							
Instrument 1: Staff data entry on participant baseline information	50	102	.05	255	85	$34.46	$2,929
Instrument 2: Study MIS to track receipt of services	30	200	1	6,000	2,000	$34.46	$68,920
Instrument 3: Staff and community partner interview topic guide	150	1	1	150	50	$34.46	$1,723
Burden for New Instruments							
Instrument 4: Noncustodial parent Participant interview protocol	180	1	1	180	60	$9.47	$568
Instrument 5: Staff survey	60	1	.5	30	10	$34.46	$345
Instrument 6: Staff time study	90	1	1.5	135	45	$34.46	$1,551
Instrument 7: CP interview protocol	180	1	1	180	60	$9.47	$568
Total					**2,310**		**$76,604**

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

Costs for each data collection activity were developed based on MDRC's experience with similar efforts for previous evaluations.

Activity	Detail	Estimated Cost
Instrument 1: Staff data entry on participant baseline information	• Data analysis, tabulation, and reporting • Includes 3,200 hours in labor for MDRC (includes time for continued monitoring and TA, analysis, reporting, and dissemination) • Operational expenses (such as equipment,	$475,000

Activity	Detail	Estimated Cost
	overhead, printing, and staff support)	
Instrument 2: Study MIS to track receipt of services	• Data analysis, tabulation, and reporting • Includes 2,500 hours in labor for MDRC and subcontractor (includes time for training, analysis, reporting, and dissemination) • Operational expenses (such as equipment, overhead, printing, and staff support) • System maintenance and user support	$350,000
Instrument 3: Staff and community partner interview topic guide	• Instrument development, fielding, analysis and reporting • Includes 1,275 hours of labor for MDRC and subcontractor (includes time for analysis, reporting, and dissemination) • Operational expenses (such as equipment, overhead, printing, and staff support)	$165,000
Instrument 4: Noncustodial parent participant Interviews Instrument 7: Custodial parent Interviews	• Instrument development, fielding, analysis and reporting • Includes 3,725 hours of labor for MDRC and subcontractor (includes time for analysis, reporting, and dissemination) • Operational expenses (such as equipment, overhead, printing, and staff support) • Tokens of appreciation for interview participants	$625,000.00
Instrument 5: Staff survey	• Instrument development, fielding, analysis and tabulation • Includes 500 hours of labor for MDRC (includes time for analysis, reporting, and dissemination) • Operational expenses (such as equipment, overhead, printing, and staff support)	$70,000.00
Instrument 6: Staff time study	• Instrument development, fielding, analysis and tabulation, and reporting • Includes 1,800 hours in labor for MDRC and subcontractor (includes time for analysis, reporting, and dissemination) • Operational expenses (such as equipment, overhead, printing, and staff support)	$250,000.00
	Total costs over the request period	$1,935,000.00
	Annual costs	$645,000.00

A15. Reasons for changes in burden

The key reason for changes in burden is to request additional information collection. The request also updates burden for previously approved information collections to reflect completed data collection and an update to the sample size target.

A16. Timeline

Schedule for the PJAC Evaluation

Activity	Date
Intake period	February 2018-January 2021
Design plan (internal document)	February 2018-January 2020
Collect child support administrative data	March 2019-January 2022 (ongoing)
Implementation analysis plan	March 2019
Implementation site visits	Q1/Q2 2019, Q1/Q2 2020
Policy brief introducing project	June 2019
Practitioner briefs (10 in total, released about 3 times per year)	August 2019 – September 2022
Study registration	January 2020
Impact analysis plan	May 2020
Benefit cost analysis plan	July 2020
Interim impact memo	March 2021
Implementation brief	Q2 2021
Treatment contrast brief	Q4 2021
Final impact brief	Q3 2022
Final benefit-cost brief	Q3 2022

Currently, there are no plans to archive the data collected in this study.

A17. Exceptions

No exceptions are necessary for this information collection.

Instruments

Instrument 1: Staff data entry on participant baseline information
Instrument 2: Study MIS to track receipt of services
Instrument 3: Staff and community partner interview topic guide
Instrument 4: Noncustodial Parent Participant Interview Protocol
Instrument 5: Staff Survey
Instrument 6: Staff Time Study
Instrument 7: Custodial Parent Interview Protocol

Attachments

A. PJAC 60 Day Federal Register Notice

B. MDRC IRB Approval Letter
C. Parent Interview Announcement Letter
D. Parent Interview Telephone Script
E. Parent Interview Thank You Letter
F. Staff Survey Reminder
G. Staff Time Study Reminder