

SUPPORTING STATEMENT - PART B Justification
OMB Number 0584-NEW
Paperwork Reduction Act of 1995
Evaluation of Child Support Enforcement Cooperation Requirements
SUPPORTING STATEMENT - PART A Justification
OMB Number 0584-NEW
Evaluation of Child Support Enforcement Cooperation Requirements

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B1. Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

Respondent universe and sampling methods

This is a first-time data collection.

Site visits. The Food and Nutrition Service (FNS) will purposively select 12 States for this study. The States will include: States that are currently implementing a child support cooperation requirement (hereafter “requirement”) in SNAP, States that are considering implementing the requirement, and States that formerly had the requirement and discontinued it. The site visits will include (1) semi-structured interviews and small group process mapping discussions with child support and SNAP staff, and (2) in-depth interviews with individuals/households (SNAP participants).

Respondents. The total number of estimated respondents is 664. Table B1 shows the total distribution of individuals affected by the data collection.

Table B1. Respondent type by State child support cooperation requirement status

Requirement Implementation Status	Number of states	State agency staff		Local agency staff		Legislative or judicial staff		Advocates		Individuals/ Households	
		Per State	Total	Per State	Total	Per State	Total	Per State	Total	Per State	Total
Currently implementing	7	10	70	30	210	1	7	1	7	30	210
Previously implemented	2	6	12	0	0	1	2	1	2	0	0
Considering implementing	3	6	18	0	0	1	3	1	3	30	90
Total	12	--	100	--	210	--	12	--	12	--	300

B.2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection;**
- **Estimation procedure;**
- **Degree of accuracy needed for the purpose described in the justification;**
- **Unusual problems requiring specialized sampling procedures; and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

Procedures for the collection of information

Qualitative staff interviews. Trained interviewers on the study team will conduct interviews with staff through semi-structured individual and small group discussions. Individual interviews will last 60–90 minutes, and small group process mapping interviews will last for two hours.

FNS will notify FNS Regional Offices of selected study States in their region and provide them with an email template to notify the State SNAP agencies of their selection to participate in this congressionally mandated study. These emails will provide an overview and fact sheet on the study, and introduce the study’s contractors, Mathematica and its subcontractor, MEF Associates. The study team will then contact the SNAP agency directors in the selected study States via email and make an introductory call.

The Department of Health and Human Services (HHS), Office of Child Support Enforcement will send an email notifying the State child support agencies of their selection to participate in this study. This email will include an overview and fact sheet on the study and introduce the contracted vendor that will be conducting the data collection. The study team will then contact the child support agency directors in the selected study States via email and make an introductory call. During the introductory calls to both child support and SNAP agency directors, the State agencies’ participation will be confirmed and the data collection plans described, including the site visits that will include visits to both child support and SNAP State agencies

and to local child support and SNAP agency offices (Appendix N1–N6: Template for email for study states).

The study team will ask each State program director to identify a site liaison within their program to assist in planning the site visit. In the seven States that currently have the requirement, the site liaisons will assist the study team in identifying two local areas to visit in each State and facilitate introductions to those local office directors. The team will contact these directors and describe the purpose of the visit. The local agency interviews, both one-on-one interviews and process mapping discussions, will be scheduled in close consultation with the local agency to ensure minimal disruption of program operations. Following the site visit, all interviews with State and local agency staff will be transcribed and coded.

Qualitative in-depth participant interviews. The study team will conduct discussions with households/individuals through in-depth interviews. These interviews will last up to 90 minutes and will be conducted in the same geographic areas where the local office staff interviews will take place.

The study team will request State SNAP administrative data containing the name, location, and contact information to identify and recruit participants subject to the requirement, including those who comply, are sanctioned, or have received a good cause exemption. The sample will include custodial parents/primary caretakers and noncustodial parents (in States that require their cooperation).

Study team members will use the contact information obtained from the administrative data to call participants and schedule interviews. Recruiters will follow an invitation call script and send a confirmation letter after the call; participants will receive a reminder call a few days before the appointment (Appendix F1: Invitation call script, Appendix F2: Confirmation letter,

Appendix F3: Reminder script). The interviews will be held in a location that is convenient for the participant. Prior to the start of the interview, interviewers will ask participants for their consent to participate, obtain their written consent, and record their verbal consent to the interview being recorded. Interviewers will inform participants that their responses will be kept private to the extent permissible by law and ask for permission to record the interview. Following the site visit, all in-depth interviews with participants will be transcribed and coded (Appendix M: Consent form for individuals/households in-depth interviews).

Administrative data. Child support and SNAP administrative data will be collected from all 12 States in the study at a single point in time. Medicaid and Temporary Assistance for Needy Families (TANF) administrative data may also be collected in some States. The specific time frames and data elements collected will vary by the State's implementation status (i.e., currently, formerly, considering) of the requirement.

Data elements collected will include case-level child support administrative data on paternity, child support orders and payment receipt ; and SNAP household-level data on household composition, case status, and reported child support payment (Appendix G: SNAP agency administrative data collection instrument; Appendix H: Child support agency administrative data collection instrument). The study will also collect data needed to link SNAP and child support records, such as the parents' name, date of birth, and Social Security number.

Cost data. The study team will collect data on costs associated with the implementation and administration of the requirement for three States that implemented it in the previous five years. Staff in SNAP and child support agencies will fill out workbooks in Excel templates for (1) initial implementation costs and (2) ongoing implementation costs, and email them to the study

team (Appendix I: Cost data collection instrument). Each workbook will cover six months of costs and contain no personal information.

B.3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Methods to maximize the response rates and deal with nonresponse

FNS will select States that are willing to participate and have an interest in this study. An alternate State will be selected if one that is initially selected declines to participate. A variety of methods will be used to maximize individuals/households' and program staff's voluntary participation and deal with nonresponse.

Semi-structured interviews with staff. The study team will work with program staff and the site liaison before each visit to ensure that the timing is convenient. Because the visits will involve several interviews and activities each day, flexibility will be built into the scheduling of specific interviews and activities to accommodate the needs of respondents and site operations. If a respondent is unable to meet at the scheduled time, the study team will schedule an alternative time while on-site or a follow-up call at a more convenient time or arrange meet with an alternate respondent in a similar position.

In-depth in person interviews with individuals/households. The study team will aim to conduct 25-30 in-depth interviews with individuals/households in each study State that has the requirement or is considering having one (10 States in total). Because the study uses a purposeful sampling approach, the participant interview data will not be representative in a statistical sense, in that they are not generalizable and will not be used to make statements about the prevalence of experiences for all individuals/households who are or could be subject to the requirement.

In recognition that some scheduled interviews may not occur due to cancellations and no-shows, the study team will overschedule the number of appointments needed to reach the target interview goal of 25-30 interviews per State and attempt to reschedule interviews while on-site. The study team will be flexible in scheduling interviews to accommodate participants' schedules and needs. Recruiters will schedule interviews at times convenient to respondents, including daytime and evening (Appendix F1: Invitation call script). Should in person interviews not be feasible due to the evolving nature of the current COVID-19 pandemic and associated restrictions, the study team will be prepared to conduct site visit staff interviews and in-depth interviews with staff telephonically or virtually if needed.

Those who agree to participate will be mailed a confirmation letter with appointment information (Appendix F2: Confirmation letter). Respondents will receive a reminder call 24–48 hours before the scheduled appointment (Appendix F3: Reminder script). Those who participate in the in-depth interviews will receive a \$50 gift card at the end of the 90-minute interview. Previous studies have demonstrated that providing incentives help increase response rates in full-scale data collection effort, reduce non-response bias, and improve population representativeness.^{1,2}

Data reliability. The study team will employ two main strategies to ensure that the data are as reliable and complete as possible: (1) flexibility in scheduling the site visits to maximize participation and (2) assuring respondents that the information they provide be shared only within the study team. In addition, the neutral tone of the questions in the data collection

¹ Singer, E., and R.A. Kulka. "Paying Respondents for Survey Participation." In *Studies of Welfare Populations: Data Collection and Research Issues*. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press, 2002, pp. 105–128.

² Singer, E., and C. Ye. "The Use and Effects of Incentives in Surveys." *The Annals of the American Academy of Political and Social Science*, 2013, vol. 645, no. 112.

protocols, along with training site visitors, will facilitate a high degree of data accuracy. All interviews will be recorded and transcribed to ensure that information is recorded accurately. The study team will systematically code the transcribed interviews using a coding scheme. For quality assurance purposes, a member of the study team will oversee the coding process and independently code 10 percent of the coded transcripts.

Site visit team members will synthesize information obtained through their interviews with staff, along with information obtained through process mapping discussions with frontline child support and SNAP staff, to produce site visit summaries. Where possible, information will be triangulated across different data sources to identify discrepancies across different respondents within and across sites.

Use of information. The study will provide critical information that is currently not available on implementation, effects, costs and benefits of the requirement. The findings will inform help State policymakers make informed decisions about adopting this option and inform national policy discussions on whether to mandate this requirement. Child support and SNAP staff will benefit from lessons learned through other States' implementation experiences.

B.4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

Test of procedures or methods to be undertaken

The study team had planned to pretest the draft instruments in a State that currently implements a requirement. However, it was not possible to implement the planned pre-test due to the current public health emergency (PHE), which both restricted travel and in person contact as well as creating enormous strains on the SNAP and child support programs.

B.5. Individuals consulted on statistical aspects, collecting and/or analyzing data

The following individuals were consulted on the study design or will be involved in the data collection and analysis for this study: **Mathematica:** Pamela Holcomb, project director, 202-250-3573; Julie Hartnack, deputy project director (617) 715-6938; Quinn Moore, principal investigator, 609-945-6592; Rebekah Selekman, site visit task lead, 609-945-6598; **MEF Associates:** Asaph Glosser, site visitor and interviewer, 206-653-0225. **NASS:** Doug Kilburg, Mathematica Statistician, (202) 720-9189 (Appendix K1: NASS comments, Appendix K2: FNS response to NASS comments).