Temporary Assistance for Needy Families (TANF) Data Innovation Project – Formative Data Collection

OMB Information Collection Request

0970-0356

Supporting Statement

Part A

July 2018

Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

4th Floor, Mary E. Switzer Building
330 C Street, SW
Washington, D.C. 20201

Project Officer:
Girley Wright

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (OPRE) at the U.S. Department of Health and Human Services (HHS) seeks approval to conduct stakeholder interviews as part of the TANF Data Innovation (TDI) project. The purpose is to gather information about state and county TANF agencies' needs and capacities to set up and operate linked administrative data systems. The primary goal of this information collection is to inform our approach to providing state and county TANF agencies with training and technical assistance on using data to build evidence. This initial data collection preceeds a second phase of the project, for which a full information collection request will be submitted. Permission to contact key stakeholders for this purpose is requested under ACF's formative generic clearance process.

Project Background

The TDI project is an investment to expand the integration, analysis, and use of TANF data to improve program administration, payment integrity, and outcomes for participants. Launched in 2017, TDI is sponsored by OPRE in collaboration with the ACF Office of Family Assistance (OFA). To accomplish the stated goals, TDI will provide broad training and technical assistance (TTA) to states and counties on using data for building evidence over a 30-month period. The potential list of TA topics is very broad, and may cover topics such as: integrating databases, using data and analytics to answer programmatic questions, and presenting findings visually.

The study will take a two-phase approach to identify priority topics for TA. Phase 1 is the focus of this information collection request. Building off of the project team's prior experience in doing needs assessments and providing TA to states, the project team has put together interview protocols for key groups of stakeholders with interests in seeing state TANF data used effectively to help improve program administration, payment integrity, and outcomes for participants. Stakeholder interviews will gather information on perceptions of states' current capacities and needs to help identify priorities for the early TA efforts of the project. Phase 2 consists of fielding a needs assessment survey that will be completed by state and, as appropriate, county TANF agency administrators and staff to gather more detailed information about their capacities and needs. These data will help the team further refine its plan for future TA topics and provide a snapshot of the current challenges and opportunities facing states as they seek to improve their data use. The TDI Needs Assessment survey will be submitted for full OMB clearance later this year.

Legal or Administrative Requirements that Necessitate the Collection

There are no legal or administrative requirements that necessitate this data 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

This purpose of this data collection is to help OPRE identify the needs of a broad range of TANF stakeholders. The TDI project is an investment in technical assistance intended to improve data quality for TANF program administration *and* increase the use of TANF administrative data in human services policy research and program evaluation. The proposed data collection will inform strategies to achieve the latter of these two goals.

We plan to gather stakeholders' views about state and county TANF agencies' data readiness, data usage, and challenges through interviews with the following types of respondents:

- current or former state TANF administrators and staff,
- federal agency staff,
- other relevant state agency staff,
- researchers,
- members of national organizations with experience and expertise related to TANF, and
- vendors or firms that have worked with states to develop and maintain their databases.

Information collected will be used for internal ACF planning purposes, to inform TA and the next phase of this project.

Research Questions

The purpose of this data collection is to answer the following research questions:

- How do stakeholders assess the current capacity of states to integrate and use administrative data to improve TANF program outcomes and payment integrity?
- What are stakeholders' priorities for improving the use and integration of administrative data?
- What barriers and challenges do stakeholders face in using TANF administrative data as part of their work?
- What common TANF agency needs could be addressed by training and technical assistance supporting data analysis and program improvement?

Study Design

The TDI team identified priority stakeholder groups that have knowledge of state TANF agencies' data readiness, data usage, and data challenges. Interview targets also have an interest in seeing state TANF and other human services data used effectively to help improve program administration, payment integrity, and outcomes for participants. Within the key stakeholder groups, specific individuals were identified by their TANF experience or by virtue of their professional experience that allows them to speak to the national TANF landscape and/or provide a deeper understanding of TANF agencies, priorities, barriers, and future agendas.

After gaining OMB approval, the project team will reach out to individuals by phone and e-mail to request interviews (see Appendix A - TDI Outreach Email for Stakeholder Interviews and Appendix B - TDI Outreach Phone Script for Stakeholder Interviews.) We anticipate that most individuals will choose to participate because of their interest in improving state TANF data systems and usage.

Some stakeholder interviews will likely be conducted one-on-one, while others may be conducted in small groups to elicit more interactive dialogue. Most of the interviews will likely be conducted by phone, however, some may be conducted in person at conferences or meetings being held in 2018. Interviews may be recorded and transcribed and/or notes may be taken. Respondents will be informed that their information will be kept private to the extent permitted by law, which should encourage respondents to provide high quality information.

Universe of Data Collection Efforts

The only data collection instrument included in this request for generic clearance is a set of interview questions for key stakeholders with interests in seeing state/county TANF and related human services data used to improve program administration, payment integrity, and outcomes for participants. Attachment 1 (*TANF Data Innovation (TDI) Needs Assessment Stakeholder Interviews)* includes the full list of interview questions and describes how subsets of questions will be asked to members of various stakeholder groups to reduce individual burden.

A3. Improved Information Technology to Reduce Burden

The burden to participating individuals is minimal and the project team plans to use information technology to reduce it further, wherever possible. When available, information from the internet will supplement requests for information in order to minimize burden. The team may communicate with key stakeholders through email, telephone, and/or in-person. (See Appendix A - TDI Outreach Email for Stakeholder Interviews and Appendix B - TDI Outreach Phone Script for Stakeholder Interviews.) Most interviews will be conducted by phone.

A4. Efforts to Identify Duplication

The stakeholder interviews will build on a state needs assessment conducted by TDI partner Chapin Hall's Family Self-Sufficiency Data Center (FSSDC). This assessment highlighted the status of state data analytic capacity and practice in 2014. The TDI team has used this prior needs assessment to focus the stakeholder interview questions on priority items, while allowing opportunities for respondents to highlight new needs that have emerged since 2014.

The Office of the Assistant Secretary for Planning and Evaluation (ASPE) and the Administration for Children and Families also funded a study called "A Scan of the Status of States' Integration of Human Services and Health Insurance Programs" to assess the extent of states' cross-program integration activities. This project administered a questionnaire to state human services commissioners in 2016 (collected under OMB #0990-0421). This questionnaire was primarily focused on data integration for eligibility determination and enrollment, not on capacity for analytics, performance measurement, or program improvement. As such, the current effort is not duplicative.

A5. Involvement of Small Organizations

It is possible that some of the key stakeholders are part of small organizations. To minimize burden, we will conduct interviews at times convenient for them.

A6. Consequences of Less Frequent Data Collection

Not collecting this information would severely limit the project team's understanding of current state and county TANF agencies' data readiness, data usage, and challenges. Without this information, the project team's ability to adequately plan and tailor ACF-funded TA would suffer. By limiting the questions posed in this assessment to those that cannot be answered using previous needs assessments, we will avoid placing undue burden on the respondents.

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 the overarching generic clearance for formative information collection. This notice was published on October 11, 2017, Volume 82, Number 195, page 47212, and provided a sixty-day period for public comment. During the notice and comment period, no substantive comments were received.

Consultation with Experts Outside of the Study

We do not currently anticipate engaging any outside experts outside of the stakeholder interviews.

A9. Incentives for Respondents

No incentives for respondents are proposed for this information collection.

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. The Contractor shall ensure that all of its employees, subcontractors, and employees of each subcontractor, who perform work under this contract, are trained on data privacy issues.

A11. Sensitive Questions

There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Total Burden Requested Under this Information Collection

We anticipate interviewing 48 individuals in total across the stakeholder groups. We anticipate it will take individuals one hour to complete the interview. We anticipate doing a second round of

1 hour interviews with about half of the respondents. Over the three year clearance period of the overarching generic, we anticipate a total of 24 annual burden hours for this effort, distributed approximately as shown below.

Stakeholder	Total Number of Respondents	Annual Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Group 1: Federal TANF Leaders and Organizations	12	4	1.5	1	6	$34.07	$204.42
Group 2: Federal Self-Suffiency Leaders and Organizations	12	4	1.5	1	6	$34.07	$204.42
Group 3: State/Local TANF Administrators and Staff	12	4	1.5	1	6	$34.07	$204.42
Group 4: Researchers	6	2	1.5	1	3	$38.87	$116.61
Group 5: Vendors	6	2	1.5	1	3	$46.63	$139.89
TOTAL	48	16			24		
Estimated Annual Burden Total							$869.76

Total Annual Cost

Groups 1 - 3: Estimates for these respondents are based on the Department of Labor (DOL) May 2016 estimates for the mean hourly wage of Social and Community Service Managers: $34.07 http://www.bls.gov/oes/current/oes119151.htm

Group 4: Estimates for these respondents are based on the Department of Labor (DOL) May 2016 estimates for the mean hourly wage of Social Scientists: $38.87 https://www.bls.gov/oes/current/oes193099.htm

Group 5: Estimates for these respondents are based on the Department of Labor (DOL) May 2016 estimates for the mean hourly wage of Management, Scientific, and Technical Consulting services: $46.63 http://www.bls.gov/oes/current/oes119151.htm

A13. Cost Burden to Respondents or Record Keepers
There are no additional costs to respondents.

A14. Estimate of Cost to the Federal Government
The total cost for the data collection activities under this current request will be $74,737. The estimate includes the costs of project staff time on interviewing stakeholders and reaching out to individuals to set up interviews.

A15. Change in Burden
This is a new generic information collection under 0970-0356.

A16. Plan and Time Schedule for Information Collection, Tabulation and Publication
Initial outreach to stakeholders for the purpose of information gathering will take place starting in Summer 2018 and will be completed by Summer 2019, with potential follow-up questions occurring in 2020 (pending OMB approval). The information will be quickly and simply analyzed to inform early TA priorities for the project. The analysis of the information collected will be summarized in an internal report to HHS. There are no plans to publish the results of the stakeholder interviews

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.