

Integrating Financial Capability and Employment Services (InFin)

**OMB Information Collection Request
0970 – New collection**

Supporting Statement Part A

November 2021

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

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

Project Officers:
Lisa Zingman

Part A

Executive Summary

- **Type of Request:** This Information Collection Request is for a new request. We expect data collection to be complete within a year, but request 18 months of approval to account for any unanticipated delays.
- **Description of Request:** This descriptive, exploratory study will advance understanding of the extent to which financial capability interventions are incorporated in employment-related contexts, the factors that have led to their inclusion, and the key features of such programs. Our data collection efforts include: a survey of employment and training (E&T) programs that include financial capability interventions; phone interviews with program administrators from E&T agencies with financial capability services; virtual site visit interviews with E&T programs and their staff and partners; interviews with those who have participated in financial capability services within E&T programs; a cross-program focus group discussion with E&T program administrators; and lastly, employer interviews with program administrators for employer-based financial capability programs. We do not intend for this data to be generalizable to a broader population.

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

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

A1. Necessity for Collection

Adults with low and moderate incomes face a range of economic challenges, such as financial instability and barriers to upward mobility, which stem in part from low wages and limited employment opportunities. In addition, limited knowledge of financial concepts and access to financial products and services can worsen these challenges. To help improve the financial lives of people with lower incomes, public policy funds both employment and training (E&T) programs and financial capability interventions (i.e., programs and services that help people build the capacity to manage their finances). Examples of financial capability interventions include financial education, financial counseling, and financial coaching, as well as programs and services targeting financial access (e.g., asset-building programs, programs that support access to public benefits and provide tax preparation services, credit-building programs).

E&T programs provide opportunities to deliver these financial capability interventions, but there is currently little evidence of E&T program effectiveness in this role. A recent literature synthesis for the Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (OPRE) by the Urban Institute, under subcontract to MEF Associates, found there are numerous ways in which financial capability interventions and E&T programs might work well together to bring about improvements in financial and economic outcomes for adults with low incomes, and identified various examples of interventions that bring together the two. However, there is limited existing research specifically examining the implementation and effectiveness of financial capability interventions integrated into E&T programming.¹ This project seeks to fill that gap in the research and develop a better understanding of how financial capability interventions reach and support low-income populations through E&T programs. ACF has contracted with MEF Associates and its subcontractor Urban Institute to conduct this study.

There are no legal or administrative requirements that necessitate this collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose

Purpose and Use

The purpose of this project is to help ACF better understand the extent to which E&T programs serving low-income adult populations incorporate financial capability interventions; the factors that led to their inclusion; how such training is incorporated; the key features of such programs; and options for future research and evaluation efforts in this area. The information collected is meant to contribute to the body of knowledge on ACF programs, to help establish a basis for potential future research and evaluation by ACF or other agencies in this area, and to highlight examples of promising strategies for E&T programs interested in incorporating financial capability services into their programming as well as for financial capability providers considering incorporating employment services directly or through partnerships. 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

¹ Treskon, Mark, William J. Congdon, Kassandra Martinchek, and Alexander Carther (2021). *Integrating Financial Capability into Employment Services: Literature Synthesis*, OPRE Report #2021-04, Washington, DC: Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

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

Collectively, the information collection activities in this study will contribute to the broader body of knowledge of financial capability interventions in the context of E&T programs and provide insights on the potential for empirical evaluation. The data collection activities will meet these goals by addressing the following broad research questions:

1. To what extent are employment coaching or training programs incorporating financial capability training?
2. Why are they incorporating financial capability training? What factors, including any state or local policies, drive this decision?
3. What are the key inputs, activities, and outputs of financial capability trainings as implemented within employment and training programs?
4. What are the efforts to evaluate financial capability training in employment and training contexts to date?
5. What are the research gaps in these areas and options for future research and evaluation efforts to address them?

Study Design

The study data collection utilizes a mixed-methods approach to adequately answer all research questions, beginning with a web-based **survey** of program managers or agency leads at E&T programs integrating financial capability services. We will then conduct **phone interviews** with staff at E&T programs integrating financial capability services to gather more in-depth information on integration models. We will use the information learned during the survey and phone interviews to select E&T programs integrating financial capability services to conduct **virtual site visit interviews** and **interviews with participants** of those programs. We will also conduct **interviews with employers** offering financial capability services and cross-program **focus groups of administrators** of E&T programs integrating financial capability services. Table 1 explains each data collection activity and corresponding instrument in greater detail. The study is designed to capture an understanding of how and to what extent E&T programs are integrating financial capability services. We will collect information on variation in implementation across E&T program types, details on the types of financial capability services offered, how those services are integrated, how participants experience these types of services, the types of programs offered by employers, and challenges in offering financial capability services.

The modes of information collection and the specific topics each reflect input from experts and stakeholders consulted at an earlier stage of the project. Section A8 provides more information about the consultations.

For a detailed discussion of the appropriateness of this study design, see B.1 of Supporting Statement B. Study limitations include the fact that data collected through the survey, semi-structured interviews, and focus groups are not generalizable and the fact that the study is not designed to be representative of all E&T programs integrating financial capability interventions. Limitations will be clearly noted in any public information related to this information collection.

Table 1: Description of Instruments Involved in Information Collection

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

<i>Data Collection Activity</i>	<i>Instruments</i>	<i>Respondent, Content, Purpose of Collection</i>	<i>Mode and Duration</i>
Survey of E&T Programs Integrating Financial Capability	Survey instrument (Instrument 1)	<p>Respondents: Program managers or agency leads of E&T programs thought to have financial capability interventions</p> <p>Content: Questions on type of financial capability services integrated and details on the model of integration</p> <p>Purpose: Documenting high level characteristics of financial capability interventions and model of integration</p>	<p>Mode: Online Survey</p> <p>Duration: 20 minutes</p>
Phone interviews	Phone interview guide (Instrument 2)	<p>Respondents: Program administrators from E&T programs with financial capability interventions</p> <p>Content: Description of financial capability services, components, the key inputs, activities, and outputs involved in offering financial capabilities services; how financial capability services fit in the context of the organization and the E&T services; why program administrators chose to include financial capability services broadly and the specific services they offer; how staff are prepared to deliver financial capability services, issues, implementation, policy contexts; descriptions of partnerships and other organizations working in this space, curricula chosen and if/how tailored, trainings and preparation of staff for delivering services, thoughts on challenges and successes, and monitoring and evaluation activities; use of credit reports by hiring employers.</p> <p>Purpose: Collecting qualitative information on E&T programs implementing financial capability services across a variety of program types</p>	<p>Mode: Phone calls or videoconferencing</p> <p>Duration: 90 minutes</p>
Virtual site visit interviews	Site visit interview guide (Instrument 3)	<p>Respondents: Program administrators, staff, and partners of four E&T programs with financial capability interventions</p> <p>Content: The virtual site visit interviews will expand on the same topic areas listed for the phone interviews, with additional detail.</p> <p>Purpose: Collecting in-depth qualitative information from multiple perspectives on a limited number of notable models of E&T programs implementing financial capability services</p>	<p>Mode: Videoconferencing</p> <p>Duration: 90-minute interviews</p>

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

Participant interviews	Participant interview guide (Instrument 4)	<p>Respondents: Current and recent program participants in financial capability interventions delivered through E&T programs</p> <p>Content: Experiences with financial capability interventions delivered through E&T programs; reasons for participating; whether participants thought services met their needs and expectations; whether they found the services useful; how they see financial capability intersecting with their experiences finding a job, maintaining a job once they have found it, and improving their financial well-being after they exit the program (including in overcoming challenges and supporting their well-being in smaller ways); participants' awareness that employers may screen credit reports in the hiring process.</p> <p>Purpose: To support a brief specifically on participant perspectives and contextualize a brief on the use of credit reports in employment. We will also include questions to gather participant feedback on how E&T programs could better provide financial capability services.</p>	<p>Mode: Phone calls or videoconferencing</p> <p>Duration: 90 minutes</p>
Employer interviews	Employer interview guide (Instrument 5)	<p>Respondents: Program administrators (typically HR representatives) for employer-based financial capability programs for low-income adults, and/or firm or organization managers or leadership involved in the organization decision making related to program adoption or operation</p> <p>Content: Description of financial capability services, components, and how they fit in the context of the employer; why the employer chose to include financial capability services; how staff or partners are prepared to deliver financial capability services; program implementation; descriptions of partnerships, curricula chosen and if/how they were tailored; challenges and successes including perceived impact on participants' financial well-being; use of credit reports by hiring employers.</p> <p>Purpose: Collecting qualitative information on a variety of employer-based financial capability programs to support a brief specifically on programs delivered in the employer context</p>	<p>Mode: Phone calls or video conferencing</p> <p>Duration: 60 minutes</p>
Program	Program	Respondents: Program administrators of E&T	Mode:

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

administrator focus groups	administrator focus group guide (Instrument 6)	<p>programs integrating financial capability services</p> <p>Content: Goals in implementing financial capability interventions within an E&T program; challenges encountered and approaches to overcoming them; successes; promising practices; lessons learned; ideas for future advancement of the field; areas for research.</p> <p>Purpose: To have programs discuss experiences with each other and to elicit ideas about how to confront challenges or build upon the successes that they have each experienced. This will inform a brief on challenges programs experience incorporating financial capability services.</p>	<p>Videoconferencing</p> <p>Duration: 90 minutes</p>
----------------------------	--	--	---

A3. Use of Information Technology to Reduce Burden

The project team will use Qualtrics, a web-based survey platform, to collect responses for the **survey** (Instrument 1). This will reduce burden for respondents by programming skips for nonapplicable questions, enabling them to submit responses efficiently and on their own time, save their work and continue later if they are not able to complete their response at once, and share with colleagues if needed. The project team anticipates all of survey responses will be completed via the web link.

The semi-structured interviews and focus groups (**Program Administrator Phone Interviews, Virtual Site Visit Interviews, Interviews with Participants, Interviews with Employers, and Focus Groups with Program Administrators**) will be conducted via videoconferencing or phone, and audio recorded with the permission of respondents. Burden will be reduced by scheduling interviews at convenient times for respondents. Conducting interviews via videoconferencing or phone allows respondents to participate in the interview from their home or office while also maintaining health safety guidelines during the ongoing pandemic. The project team will tailor the interview protocols to select only those questions relevant to each respondent.

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

This information will not duplicate information already available, as there is currently little known about the implementation and effectiveness of programs that integrate financial capability interventions into E&T programming. While programs that participate in the survey may be asked to participate in subsequent data collection activities (see B.1 in Supporting Statement B), the purpose of each data collection activity and the level of detail collected differs. In addition, respondents may differ in the different stages of the information collection, and it will be valuable to the research to obtain different perspectives; for examples, program managers and front line staff may have different but complementary understandings of the details of service delivery. Even so, researchers conducting later

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

stages of information collection will have access to responses from earlier stages and, given the semi-structured nature of the interviews and focus groups, will use that information to avoid asking questions again if an additional perspective is not needed.

A5. Impact on Small Businesses

The primary organizations involved in the *survey, phone interviews, virtual site visit interviews*, and *focus groups of administrators* will be local employment and training providers. It is possible some may be small entities as defined by OMB Form 83-I. Some small businesses may also be involved in the *interviews with employers*. The project team will minimize the burden for all respondents by providing clear guidance on procedures and by requesting only the information required to achieve the study's objective as part of this one-time data collection. Interviews with staff will be scheduled according to their availability, and no more than 90 minutes will be required of any one individual. There should be no adverse impact for any organizations participating in this study.

A6. Consequences of Less Frequent Collection

All data to be collected associated with this specific burden request are one-time in nature. Not collecting information as proposed would limit the government's ability to identify and document valuable information about the strategies employment and training programs use to provide financial capability services to their participants that can promote self-sufficiency.

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 August 27, 2021, Vol. 86, No. 164, page 48152, and provided a sixty-day period for public comment. During the notice and comment period, ACF did not receive any substantive comments.

Consultation with Experts Outside of the Study

We consulted both federal and non-federal experts to regarding the topics listed below. We asked different groups of experts to weigh in on different aspects of the study. When specific information was requested, the information was not requested from more than 9 individuals.

- Understanding the prevalence of financial capability interventions offered by E&T programs
- Identifying programs for inclusion in the survey sample

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

- Providing information on policies that might affect the adoption of program models combining employment services and financial capabilities
- Providing input on study focus
- Identifying audiences for study outputs

Table 2. List of Federal and Nonfederal Experts

Federal Experts	
Name	Office/ Agency
ACF OFFICES	
Carmelia Strickland	Administration for Native Americans
Lynda Perez	Office of Community Services
James Murray	Office of Child Support Enforcement
Stanley Koutstaal	Office of Family Assistance – National Staff
Christina Tsichlis	Office of Family Assistance – Regional Staff
Frank Shields	Office of Family Assistance – Regional Staff
Julie Fong	Office of Family Assistance – Regional Staff
Mikaela Smith	Office of Family Assistance – Regional Staff
OTHER AGENCIES	
Janneke Ratcliffe	Consumer Financial Protection Bureau
Kenneth McDonnell	Consumer Financial Protection Bureau
Laura Schlachtmeyer	Consumer Financial Protection Bureau
Wayne Gordon	Employment and Training Administration, Department of Labor
Susan Burhouse	Federal Deposit Insurance Corporation
Tracie Morris	Federal Deposit Insurance Corporation
Louisa Quittman	Office of Consumer Policy, Department of the Treasury
Barbara Smith	Office of Retirement Policy, Social Security Administration
Nonfederal Experts	
Name	Organization
Don Baylor	Annie E. Casey Foundation (Baltimore, MD)
Ida Rademacher	Aspen Institute (Washington, DC)
Tamara Lindsay	Cities for Financial Empowerment Fund (New York, NY)
Sherry Riva	Compass Working Capital (Boston, MA)
Emet Ma'ayan	Fathers Building Futures (Albuquerque, NM)
Gary Mottola	FINRA Foundation (Washington, DC)
David Greenberg	Local Initiatives Support Corporation (New York, NY)
Caroline Schultz	MDRC (New York, NY)
Ben Damerow	Michigan Works! Southwest (Kalamazoo, MI)
Carly Urban	Montana State University (Bozeman, MT)
Yvette Chocolaad	National Association of State Workforce Agencies (Washington, DC)
Billy Hensley	National Endowment for Financial Education (Denver, CO)
Timothy Ogden	NYU (New York, NY)
Mae Watson Grote	The Financial Clinic (Brooklyn, NY)
J. Michael Collins	University of Wisconsin-Madison (Madison, WI)
Mark Golden	Virginia Department of Social Services (Richmond, VA)
Sarah Garcia	Washington State Department of Social and Health Services, Community Services

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

	Division (Seattle, WA)
Susan Kavanaugh	Washington State Department of Social and Health Services, Community Services Division (Seattle, WA)
Gena Gunn McClendon	Washington University in St. Louis (St. Louis, MO)

A9. Tokens of Appreciation

We intend to provide tokens of appreciation in connection only with the **interviews with participants** mode of information collection. Interview data with participants 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 population of adults with low incomes. However, it is important to secure participants with a range of background characteristics to capture a variety of possible experiences with financial capability services in E&T programs. As all participants will be current or former participants of E&T programs serving adults with low incomes, the target population is, by definition, low income. Without offsetting the direct costs incurred by respondents for participating in the interviews, such as arranging child care or time off from paid work, the research team increases the risk that only those individuals able to overcome the financial barriers to attend will participate in the study. Participants will receive a \$30 gift card following the interview.

The amount proposed is based on research on tokens of appreciation and the study team's experiences with other federal studies. For example, TANF recipients who participated in 90 minute focus groups as part of ACF's Understanding Poverty: TANF Office Culture Study (OMB control number 0970-0520) were offered a \$25 token of appreciation and the study achieved the goal of averaging 6-9 participants per focus group. Additionally, research has shown the effectiveness of a token of appreciation in increasing study participation among underrepresented populations, such as individuals from low-income² or low-education households³, demographics of concern here. Given that previous studies have found tokens of appreciation ranging from \$25-\$75 effective in increasing willingness to participate in qualitative research, we believe \$30 is a reasonable amount for the time and cost associated with participation in these data collection activities but is not so high as to appear coercive for potential participants.⁴

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

Personally Identifiable Information

The only personally identifiable information (PII) that will be collected through the semi-structured interviews and focus groups will be voice recordings, including the interviewee's first name and voice.

² Singer, Eleanor and Richard A. Kulka. (2002). "Paying Respondents for Survey Participation." *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.

³ Singer, Eleanor, John Van Hoewyk, and Mary P. Maher. (2000). Experiments with incentives in telephone surveys. *Public Opinion Quarterly*, 64:2, 171-188

⁴ = Bridget, Kelly, Marjorie Margolis, Lauren McCormack, Patricia LeBaron, and Dhuly Chowdhury. (2017). What Affects People's Willingness to Participate in Qualitative Research? An Experimental Comparison of Five Incentives. *Field Methods*, 29:4, 333-350.

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

We will have contact information for interviewees in order to arrange data collection but will not maintain their contact information as part of the data collected. For the **interviews with participants**, we will have program staff confirm with the participant their permission to share contact information before sharing it with us.

Because the research team may wish to learn more about a survey respondent's organization through some of the subsequent data collection, the **survey** collects the respondent's name, email, and the name of their organization. We will de-identify data during analysis, using a unique identifier to link the respondent's responses to their name, email, and name of their organization, which we will keep in a separate file. Maintaining this separate crosswalk file will allow us to identify appropriate contacts to invite to participate in the **phone interviews** or **virtual site visit interviews** and to avoid asking questions during those phases of information collection if the same respondent has already provided a response at an earlier stage.

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

The research team will maintain privacy of interview participants by not disclosing PII or quotes that may be attributable to individual respondents. All members of the research team involved in program staff interviews will sign the contractor's confidentiality pledge before collecting data. Participants of the semi-structured interviews and focus groups will also be asked to participate from a private location where they will not be overheard, such as a personal office or room with a closed door, in order to protect the privacy of their answers and others', in the case of a focus group.

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 will comply with all Federal and Departmental regulations for private information.

Data Security and Monitoring

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' PII. The Contractor shall ensure that all of its employees, subcontractors (at all tiers), and employees of each subcontractor, who perform work under this contract/subcontract, are trained on data privacy issues and comply with the above requirements.

As specified in the evaluator's contract, the Contractor shall use Federal Information Processing Standard 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

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

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 PII that ensures secure storage and limits on access.

A11. Sensitive Information⁵

No sensitive questions will be asked as part of most modes of this data collection. The one exception is the **interviews with participants**; asking about participation in employment and training programs and in financial capability services may in some cases involve asking about receipt of economic assistance from the government.

Including these items is necessary to understand participants' experiences accessing services through the programs and services that are the focus of the study. The research team will take several steps to minimize the discomfort that such questions may pose. Participants will be alerted to the types of questions that might cause discomfort as part of the informed consent process. Staff will inform respondents that participation is voluntary and they may refuse to answer individual items or stop the interview, including after the interview has started. Study participants will also be reminded that the study team will keep their responses private, to encourage their candid responses. When coordinating the interviews, the research team will identify at least one resource (potentially appropriate program staff) to refer participants to for support if they experience emotional strain.

Appendix F includes approval for this study from the HML IRB Institutional Review Board.

A12. Burden

Explanation of Burden Estimates

Table 3 below shows estimated burden for the information collection, which will take place over a period of approximately 12 months. Respondents by instrument include:

- Survey: 80 E&T Program Managers for .33 hours each (Instrument 1)
- Phone Interviews: 15 E&T Program Managers for 1.5 hours each (Instrument 2)
- Virtual Site Visit Interviews (Instrument 3):
 - o 8 Program Managers for 1.5 hours each
 - o 24 Frontline Staff for 1.5 hours each
- Participant Interviews: 16 participants for 1.5 hours each (Instrument 4)
- Employers Interviews: 10 HR Representatives for 1 hour each (Instrument 5)
- Program Administrator Focus Groups: 10 E&T Program Managers for 1.5 hours each (Instrument 6)

Estimated Annualized Cost to Respondents

We estimate the total annual cost burden respondents to be \$5,434.11 We estimate hourly wages from the May 2020 U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment and

⁵ 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.

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

Wages, fully loading them at 33% to account for benefits.⁶ For program managers, we calculated a \$44.50 hourly wage based on the mean wages for “Social and Community Service Managers” (11-9151). For frontline staff, we calculated a \$30.39 hourly wage based on the mean wages for “Community and Social Services Occupations” (21-000). For participants, we used the federal minimum wage. For employers, we calculated a \$77.51 hourly wage rate based on the mean wages for “Human Resources Managers” (11-3121).

Table 3: Total Burden Requested Under this Information Collection

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)	Average Hourly Wage Rate	Total Annual Respondent Cost
Survey	80	1	.33	26	\$44.50	\$1,174.80
Phone Interviews	15	1	1.5	23	\$44.50	\$1,023.50
Virtual Site Visit Interview (Managers)	8	1	1.5	12	\$44.50	\$534
Virtual Site Visit Interview (Frontline Staff)	24	1	1.5	36	\$30.39	\$1,094.04
Participant Interviews	16	1	1.5	24	\$7.25	\$174
Employer Interviews	10	1	1	10	\$77.51	\$775.10
Program Administrator Focus Groups	10	1	1.5	15	\$44.50	\$667.50
Total				146		\$5,442.94

A13. Costs

There are no additional costs to respondents.

A14. Estimated Annualized Costs to the Federal Government

Activity	Detail	Estimated Cost
Data Collection	<ul style="list-style-type: none"> 1,723 hours \$480 for incentives for participant interviews Includes prorated project management costs 	\$209,714
Analysis	<ul style="list-style-type: none"> 1,159 hours Includes prorated project management costs 	\$142,391
Publications/Dissemination	<ul style="list-style-type: none"> 2,159 hours Includes prorated project management costs 	\$322,468
Data Security	<ul style="list-style-type: none"> 98 hours Includes prorated project management costs 	\$13,296
Total costs over the request period		\$688,901

A15. Reasons for changes in burden

This is a new information collection request.

⁶ https://www.bls.gov/oes/current/oes_nat.htm#11-0000

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

A16. Timeline

Table 4 below outlines a schedule for data collection, analysis, and reporting.

Task	Timeframe
Table 4: Data Collection Timeline Web survey	1-4 months after OMB approval
Phone interviews	3-6 months after OMB approval
Site visits, participant interviews, and employer interviews	5-7 months after OMB approval
Program administrator focus groups	8-10 months after OMB approval
Data analysis	1-12 months after OMB approval
Completion of final report	17 months after OMB approval
Completion of project briefs	17 months after OMB approval

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instrument 1. Survey of E&T Programs Integrating Financial Capability

Instrument 2. Phone Interview Protocol

Instrument 3. Virtual Site Visit Interview Protocol

Instrument 4. Participant Interview Protocol

Instrument 5. Employer Interview Protocol

Instrument 6. Program Administrator Focus Group Protocol

Appendix A. Survey Outreach and Reminder Emails

Appendix B. Phone Interview Outreach Email

Appendix C. Virtual Site Visit Outreach Email

Appendix D. Employer Interview Outreach Email

Appendix E. Program Administrator Focus Group Outreach Email

Appendix F: Institutional Review Board Approval