Lookback Survey of Wilson Fish TANF Coordination Program Grant Recipients Over the Initial Project Period

Formative Data Collections for Program Support

0970 – 0531

Supporting Statement

Part A - Justification

May 2024

Submitted By:

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**A1. Necessity for the Data Collection**

The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) seeks approval for a short survey of the initial cohort of Wilson Fish TANF Coordination Program (WF TCP) grant recipients near the close of the first project period in order to review the development of each grant recipient’s WF TC program over the project period as well as inform development of the next project period.

#### *Background*

The WF TCP is a discretionary program that helps ORR-eligible families with minor children obtain the resources and life skills to become self-sufficient and achieve sustained social and economic wellbeing, with a focus on ORR-eligible families who are eligible for TANF. One-or two-parent ORR-eligible families, who may be eligible for and enrolled in a state TANF program depending on the particular state’s eligibility requirements, can experience challenges navigating a mainstream benefits program that does not always provide relevant, customized, or culturally and linguistically appropriate services to ORR-eligible populations.

ORR selected 21 recipients during a competitive process in FY 2020, with the first year of the project period beginning in FY 2021. The project period was 48 months and was scheduled to end on September 29, 2024. ORR secured approval to extend the initial project period by one additional year, which will end on September 29, 2025, so that recipients had opportunity to implement their program design as envisioned prior to the advent of the COVID-19 pandemic and the emergency response to Afghan and Ukrainian arrivals shortly after their program designs were submitted to ORR and the grant was awarded. Recipients are required to provide foundational case management for eligible participants and to coordinate with their state TANF offices on client cases and training topics to promote knowledge sharing among staff and successful participation in TANF activities for ORR-eligible clients. Recipients may also develop specific services for these one- or two-parent families with minor children to fill gaps that the family is not receiving from another ORR-funded programs, such as employment services, childcare and transportation access, vocational English classes, and financial and digital literacy services.

Recipients are required to submit data to ORR twice a year describing the number of participants in each program as well as the types of services each program provides (performance data requirements approved under OMB # 0970-0490). ORR would like to solicit additional information from recipients through a short survey to better understand how the various flexibilities allowed by WF TCP were incorporated into grant recipients’ projects during the current project period. The information will inform the development of the next project period and will provide ORR with information on promising practices and approaches to service delivery that can be shared among current recipients. Depending on availability of funds, ORR intends to issue a new Notice of Funding Opportunity (NOFO) in spring of 2025 for the next project period and the information from the survey will be extremely useful to help inform future programming for potential new funding opportunities.

#### *Legal or Administrative Requirements that Necessitate the Collection*

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

**A2. Purpose of Survey and Data Collection Procedures**

***Overview of Purpose and Use***

The overall purpose of this information collection is to provide ORR with useful information about the initial project period efforts by and experiences of the WF TCP grant recipients. ORR intends to use the collected data to summarize the various flexibilities offered through the discretionary program in its first project period and understand which populations, flexibilities, and service methods allowed by the project were not feasible because of the current program design and/or larger environmental factors. This data collection will also inform future program design and guidance materials for WF TCP specifically and may inform other ORR-funded program design ORR intends to request information from recipients near the end of the current project period that it is not able to collect from other required reporting mechanisms. Grant recipients will be undergoing a Non-Competing Continuation application process for Year 5 funding during the survey period and the information gathered will inform the information included in the NOFO for the next project period. The survey will include language to assure grantees that responses will not impact their Year 5 NCC application.

Since this program is intended to promote innovations in service delivery to vulnerable populations, ORR would like to collect information on promising strategies or approaches developed by recipients as a result of this program. ORR will also request information on how to improve or adjust current provision of technical assistance and methods of communication with recipients. ORR plans to provide an aggregate summary to all recipients for their information.

#### The proposed information collection effort meets the following goals of ACF’s generic clearance for formative data collections for program support (0970-0531):

* Delivery of targeted assistance related to program implementation and the refinement of program and grantee processes
* ORR intends to collect information on its communication to recipients regarding program implementation and requirements.
* Planning for provision of programmatic training or technical assistance (T/TA).
* ORR intends to collect information about promising strategies or approaches among recipients.
* Obtaining feedback about processes and/or practices to inform ACF program development or support.
* ORR intends to collect information that will inform the further development of ORR programs, both WF TCP specifically as well as potentially informing other ORR program development

***Processes for Information Collection***

ORR intends to collect this information using a fillable PDF document that will include free text, multiple choice, and single choice questions. ORR will send the survey to all 21 WF TCP recipients to respond within a three-week timeframe. ORR will provide an aggregate summary to all recipients for their information after gathering all individual recipient responses.

**A3. Improved Information Technology to Reduce Burden**

ORR proposes to utilize a fillable PDF document for the electronic completion and submission of survey responses.

**A4. Efforts to Identify Duplication**

ORR does not currently collect the proposed information from its required twice-annually program data collection from WF TCP recipients, nor has it completed a discretionary grant program review for the purposes of creating a holistic summary of program effectiveness and for future project period planning.

**A5. Involvement of Small Organizations**

No small businesses will be involved with this information collection.

**A6. Consequences of Less Frequent Data Collection**

This is a one-time data collection.

**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 information collection request to extend approval of the umbrella generic with minor changes. The notice was published on January 28, 2022, (87 FR 4603), and provided a sixty-day period for public comment. ACF did not receive any comments on the first notice. A second notice was published, allowing a thirty-day period for public comment, in conjunction with submission of the request to OMB. ACF did not receive any comments on the second notice.

#### *Consultation with Outside Experts*

No consultations have taken place with experts outside of the project team.

**A9. Tokens of Appreciation for Respondents**

No tokens of appreciation 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.

**A11. Sensitive Questions**

There are no sensitive questions in this data collection.

**A12. Estimation of Information Collection Burden**

***Burden Estimates***

There will be approximately 21 respondents. The respondents consist of the grant recipients that implement the WF TCP. The survey is estimated to take about 20 minutes to complete.

***Cost Estimates***

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Community Service Managers [11-9151] and wage data from May 2023, which is $37.07 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $74.14.

<https://www.bls.gov/oes/current/oes_stru.htm>

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| --- | --- | --- | --- | --- | --- | --- |
| Instrument | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | Total  Burden Hours | Average Hourly Wage | Total Annual Cost |
| Wilson Fish TANF Coordination Program Lookback Survey | 21 | 1 | 0.33 | 7 | $74.14 | $518.98 |

**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 $143.40, which reflects 3 review hours at $47.80 per hour. The cost to the Federal Government was calculated using the Bureau of Labor Statistics (BLS) job code for Management Analysts [13-1111] working in federal government and wage data from May 2023. (<https://www.bls.gov/oes/current/oes_stru.htm>)

**A15. Change in Burden**

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

**A16. Plan and Time Schedule for Information Collection, Tabulation and Publication**

ORR intends to survey WF TCP recipients in late May 2024, pending OMB approval, for a period of two weeks. Information collected will be kept internal to ORR and WF TCP recipients and will not be published.

**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.