TANF Work Outcomes Measures

OMB Information Collection Request
0970 - NEW

Supporting Statement Part A - Justification

November 2024

Type of Request: New

Submitted By:
Office of Family Assistance
Administration for Children and Families
U.S. Department of Health and Human Services

1. Circumstances Making the Collection of Information Necessary

This is a proposed new collection in response to the requirements of section 304 of the Fiscal Responsibility Act of 2023 (FRA) (Title I, Section 304 Section 110(j) of Public Law 118-5), which requires states and territories to report data necessary to produce work outcome measures for work-eligible individuals who leave TANF. This collection was established in the interim final rule Temporary Assistance for Needy Families Work Outcomes Measures (89 FR 53870), effective October 1, 2024.

2. Purpose and Use of the Information Collection

This collection includes the following three new forms:

1. Work Outcomes of TANF Exiters Report
2. Secondary School Diploma or its Recognized Equivalent Rate
3. Supplemental Work Outcomes Report.

The data and information from these reports will be used for program analysis and oversight, including the calculation of the indicators of performance required by the FRA:

- Employment Rate – 2nd Quarter After Exit,
- Employment Retention Rate – 4th Quarter After Exit,
- Median Earnings – 2nd Quarter After Exit, and
- Secondary School Diploma or its Recognized Equivalent Attainment Rate.

For the Work Outcomes of TANF Exiters Report, states will be required to submit Social Security Numbers (SSNs) of all work-eligible individuals who exit TANF in a given quarter on a quarterly basis.

For the Secondary School Diploma Attainment Rate, states will be asked to submit their calculated rate following the definitions and formula set by ACF (see TANF Secondary School Diploma or its Recognized Equivalent Attainment Rate Instructions). The report must include documentation of methodology and data sources.

The Supplemental Work Outcomes Report will be submitted annually by interested states. The report will include documentation of data sources and methodology to assess validity and support ongoing learning and identification of best practices.

These information collections will serve as the foundation for the calculation for the four FRA work outcomes measures, which will be published in the TANF Report to Congress and on ACF's website. ACF intends to share context and methodological information about the measures to improve understanding of what these outcomes measures do and do not tell us about the performance of TANF programs. ACF also intends to share the aggregated matched data results from the Work Outcomes of TANF Exiters Report with states, DC, and territories for better program understanding and improvement.

3. Use of Improved Information Technology and Burden Reduction

States must file the quarterly Work Outcomes of TANF Exiters and the annual Secondary School Diploma Attainment Rate electronically based on format specifications that ACF provides in the instructions. The decision to use electronic filing was based on a need to reduce burden to states and territories and to increase the efficiency and timeliness of these data collections. If a state chooses to submit the Supplemental Work Outcomes Report, that also must be submitted electronically.

4. Efforts to Identify Duplication and Use of Similar Information

No current data collections provide the information necessary to produce the work outcomes measures.

5. Impact on Small Businesses or Other Small Entities

These information collections do not impact small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

The Work Outcomes of TANF Exiters report is submitted quarterly to mirror the quarterly nature of the National Directory of New Hires (NDNH) and the measures themselves (i.e., 2 or 4 quarters after exit). Quarterly reports allow us to match to the NDNH on a quarterly basis, which ensures the greatest coverage of data and highest likelihood to get a match before the data is no longer available. The other two reports are reported annually.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

No special circumstances relating to the Guidelines of 5 CFR 1320.5

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

The Interim Final Rule (IFR) for proposed regulatory changes to 45 CFR section 265 (Data Collection and Reporting Requirements) was published on June 28, 2024 (89 FR 53870) and was concurrently used as a vehicle to fulfill the requirements of 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) to provide a sixty-day period for public comment. During the notice and comment period, 12 comment(s) were received from 6 states and one membership association. Appendix A provides an overview of the comments and ACF's responses.

9. Explanation of Any Payment or Gift to Respondents

These data collections do not involve any payment or gift to respondents other than remuneration of grantees.

10. Assurance of Confidentiality Provided to Respondents

This collection falls under the ACF System of Record Notice (SORN 90-80-0375) Temporary Assistance for Needy Families (TANF) Data, established to ensure the level of confidentiality pursuant to the Privacy Act. The System of Records Notice was last modified on April 12, 2024 at 89 FR 25880.

11. Justification for Sensitive Questions

These data collections do not contain any questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

The 50 states, District of Columbia, and 3 territories are required to submit the Work Outcomes of TANF Exiters report on a quarterly basis. This report is a simple list of work eligible individuals who exited in a quarter, with the month and year of exit and the social security number for each individual. We estimate that it would take an average of 16 hours per quarter for each state to run the code to extract the SSNs for work eligible individuals who left in a quarter and to verify that the SSNs are in a valid format.

States, DC, and the territories are also required to submit the Secondary School or its Recognized Equivalent Attainment rate on an annual basis. We estimate an average of 100 hours to maintain the matching agreements, clean and reconcile the data each year.

We do not anticipate that all states, DC, and territories will complete the Supplemental Work Outcomes Report but have included all jurisdictions as possible respondents each year. This aggregate report will likely be based on existing data matches and processes, so we estimate an average burden of 30 hours per jurisdiction per year.

Estimated Cost to Respondents

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2023, which is $21.27 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is $42.54.
https://www.bls.gov/oes/current/oes_stru.htm

Information Collection Title	Total Number of Respondents	Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Work Outcomes of TANF Exiters – Part 265	54	4	16	3,456	$42.54	$147,018.24
Secondary School Diploma or its Recognized Equivalent Rate – Part 265	54	1	100	5,400	$42.54	$229,716.00
Supplemental Work Outcomes Report	54	1	30	1,620	$42.54	$68,914.80
			Estimated Annual Burden Total:	**10,476**	**Estimated Annual Cost Total:**	**$445,649.04**

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

States require a one-time start-up cost to program the file with social security numbers for the Work Outcomes of TANF Exiters. States will also have one-time start up costs to establish data sharing agreements and collect data for the Secondary School Attainment Measure. We have based our estimates on initial feedback from one state with an average sized caseload, which estimated that it would take 551 hours to review the information, define the process including metric development, and make changes to their systems. Thus, the estimated start-up cost per state is $23,439.54 (551 hours x $42.54).

14. Annualized Cost to the Federal Government

We estimate total annual federal burden to be 6,000 hours (approximate three full time equivalents). This includes the costs of information collection, development, tests, coding, tabulation, analysis, publication of results, technical assistance, and monitoring. Based on an estimated average hourly federal salary of $56.94 per hour for federal employee (GS12 -14, Locality Pay Area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA), to account for fringe benefits and overhead the rate is multiplied by two which is $113.89, the total estimated average annual cost to the federal government is $ 683,360.

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15. Explanation for Program Changes or Adjustments

This is a new information collection, established by the Fiscal Responsibility Act of 2023.

16. Plans for Tabulation and Publication and Project Time Schedule

For the Work Outcomes of TANF Exiters report, states will be required to submit SSNs of all work-eligible individuals who exit TANF in a given quarter on a quarterly basis. ACF will then match those SSNs with quarterly wage records in the NDNH, which is a national database of wage and employment information on most American workers administered by ACF's Office of Child Support Services. ACF will use these matched results to compute the first three work outcomes measures on behalf of states, with anticipated first publication in January 2027 at the earliest.

ACF plans to explore how to share information gained from the Federal-level match to make the data available to and useful for state TANF programs, in addition to satisfying the reporting requirements of the FRA. This may involve providing preliminary match results to states on a quarterly basis before the data have settled and been finalized.

ACF plans to tabulate and publish the work outcomes measures when the data have settled. In the publication, ACF is committed to sharing context to describe the unique aspects of each TANF program, and to demonstrate why direct comparisons may be misleading.

All of the measures and reports have lags inherent to tracking outcomes (e.g. 4 quarters after exit). For the annual measures, reports for the reporting period FY 2025 would not be due until 90 days after the end of FY 2027.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.