

# Supporting Pilot Program Outcomes, Research and Technical Assistance in TANF (Project SUPPORTT) Implementation and Outcomes Studies

OMB Information Collection Request  
New Collection

## Supporting Statement Part A

June 2026

**Type of Request: New**

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

## **Part A**

### **Executive Summary**

- **Type of Request:** This Information Collection Request is for a new collection. We are requesting three years of approval.

**Description of Request:** The Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services (HHS) is proposing data collection activities to conduct rigorous implementation and outcomes studies of the five Temporary Assistance for Needy Families (TANF) Pilot Programs authorized under the Fiscal Responsibility Act of 2023 which are to be held accountable to outcomes-based performance measures instead of the Work Participation Rate (WPR). These data collection activities include interviews with TANF program staff and current participants, surveys of TANF program staff and leadership, a systematic documentation of pilot costs and resources, and a survey of former TANF participants. This data will provide information on how states implement the pilots, how services and staffing evolve, and how outcomes change under the new performance benchmarks. We do not intend for this information to be generalized to a broader population, nor do we intend it to be used as the principal basis for public policy decisions.

This new request builds on two previously approved formative data collections under ACF's generic clearance for formative research (OMB #0970-0356):

1. **Pilot Assessment Activities**, which documented states' pre-pilot TANF context and informed the design of the pilots, and
  2. the **Study information form**, which gathered contact information to facilitate recruitment of former TANF participants for the outcomes study.
- **Time Sensitivity:** The pilots are currently in their planning year, which ends in September 2026. Clearance is requested by July 2026 to collect information prior to the full implementation of the pilots. Delays in clearance would prevent ACF from being able to collect baseline information necessary to conduct rigorous implementation and outcomes studies and significantly limit ACF's ability to meet the Congressional reporting requirements of P.L. 118-5.

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### A1. Necessity for Collection

The Fiscal Responsibility Act of 2023<sup>1</sup> (FRA) requires the U.S. Department of Health and Human Services (HHS) to carry out a pilot program under which it may select up to five states to negotiate new Temporary Assistance for Needy Families (TANF) performance benchmarks for work and family outcomes in place of compliance with the Work Participation Rate (WPR). The legislation also requires HHS to submit a final comprehensive report on outcomes of the pilots to Congress no later than one year after the pilot programs have ended.

To meet this requirement, the HHS Administration for Children and Families (ACF) awarded the Supporting Pilot Program Outcomes, Research, and Technical Assistance in TANF (Project SUPPORTT) contract to (1) provide research, evaluation, and data-related technical assistance (TA) to help pilot states meet the requirements of the Pilot, including negotiating new TANF performance benchmarks for work and family outcomes; (2) facilitate peer learning and other opportunities for pilot and non-pilot states to interact and learn from each other; and (3) design and conduct implementation and outcome studies of the pilot programs to inform a report to Congress as required by P.L. 118-5. ACF has contracted with Mathematica to complete this work. This data collection request is necessary to conduct implementation and outcomes studies that will assess and build evidence around outcomes-based performance monitoring in TANF programs and fulfill the requirements of P.L. 118-5. The information collection activities will last for five years, beginning in October 2026 and ending in September 2031. Final reporting will be completed during the following year.

### A2. Purpose

#### *Purpose and Use*

This Information Collection (IC) will be used to evaluate the five state TANF pilot programs and to gather information that will help us understand and contextualize how the pilot states perform against their new performance benchmarks. Ultimately, this will expand the evidence base around outcomes-based performance monitoring in state TANF programs.

The data collection instrument for the **outcomes study** will provide outcome data about study participants including information on their participation in employment, education and training programs, and use of public benefits. The study team will use this information to estimate the outcomes of the pilots. The study team will use the data collection instruments for the **implementation study** to describe the pilots' design, staffing, service provision, partnerships, and other details necessary to understand the nature of the pilots and the factors that shaped their implementation. These descriptions will also help inform interpretation of outcomes findings.

The results will provide ACF, state TANF administrators, and other stakeholders with high-quality information on the effects, design, and implementation of the pilots. ACF may use the findings to support internal learning, program oversight, and future research and evaluation efforts related to outcomes-based performance accountability in TANF. State TANF practitioners may use the findings to inform program design and performance management approaches. Other audiences, including policymakers and researchers, may use the findings to better understand alternatives to the WPR and

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<sup>1</sup> U.S. House of Representatives. (2023, May 29). *Fiscal Responsibility Act of 2023* (H.R. 3746, 118th Cong.). <https://docs.house.gov/billsthisweek/20230529/BILLS-118hrPIH-fiscalresponsibility.pdf>

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inform future research in this area. Having this information will help strengthen policy and practice on whether holding TANF programs accountable for outcome measures, rather than the WPR, leads to stronger employment outcomes and reduced dependency on federal benefits. It will also provide information that could enable replication of the pilots if future TANF policy allows for scale up.

The information collected is meant to contribute to the body of knowledge on ACF programs. 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*

The high-level research questions this evaluation will answer are:

1. How did states design the pilots?
2. How did states implement the pilots?
3. What were TANF pilot programs' outcomes during the pilot period?
4. What were TANF participants' outcomes during the pilot period?
5. How did the shift to outcomes-based performance measures and accountability relate to changes in participant outcomes?
6. What were the lessons learned from the pilots?

### **Study Design**

SUPPORTT designed and proposes to conduct implementation and outcomes studies of the five TANF pilots in Arizona, Iowa, Nebraska, Ohio, and Virginia. The implementation and outcomes study designs were informed by two prior formative data collections approved under ACF's generic clearance for formative research (OMB #0970-0356): the Pilot Assessment Activities, which documented pilot states' TANF program context and data capacity, and the Study information form, which gathered contact information to support participant outreach for the outcomes study proposed in this package. Data from these earlier efforts informed evaluation design and will be used to support sampling and outreach for the outcomes study.

### **Implementation Study**

The implementation study will document:

1. The design of the pilot programs, including the performance measures and benchmarks negotiated with ACF and the policy, structural, process, and/or program changes states made when shifting to outcomes-based performance measures and accountability.
2. How states implemented the pilots; the context in which the pilots operate; and how the different aspects of implementation (such as leadership, organizational culture and structure, staffing and staff development, service delivery, and data use) help or inhibit states' progress toward quality implementation, scaling, and monitoring and achieving negotiated performance benchmarks.
3. Changes to TANF pilot programs during the pilot period, such as changes in the allocation of resources, staff time use, and services offered.

The data collection period for the implementation study will run from September 2026 to September 2031. Table A.1 summarizes the proposed data collection activities for the implementation study.

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Instrument 1 (Pilot staff discussion guide) and Instrument 6 (In-depth participant interview guide) are designed to be semi-structured guides and the interviewer will adjust the questions as needed during the conversation to probe, follow-up, and clarify respondents' answers.

The implementation study is intended to present descriptions of the TANF pilots and their implementation in five pilot states, not to promote statistical generalization to other states. Further details on the appropriateness and limitations of the study design are provided in Section B.1 of this ICR. Any limitations will be noted in any publications resulting from the IC.

**Table A.1. Data collection activities for the implementation study**

<b>Data Collection Activity</b>	<b>Instruments</b>	<b>Respondent, Content, Purpose of Collection</b>	<b>Mode and Duration</b>	<b>Frequency</b>
Semi-structured discussions with TANF program and partner leaders, and staff	Instrument 1: Pilot staff discussion guide	<p><b>Respondents:</b> State- and county-level TANF program leaders and staff, and leaders and staff from any relevant partners in the five pilot states</p> <p><b>Content:</b> The pilots' design, implementation, and context.</p> <p><b>Purpose:</b> Document each state's TANF program before the pilots are implemented and then describe each pilot's design, implementation, staffing, service provision, partnerships, successes, challenges, and other details necessary to understand the nature of and context for the pilots. Also to help inform the interpretation of outcomes study findings.</p>	<p><b>Mode:</b> In-person during site visits and web-based if scheduled outside of a site visit either individually or in small groups, with virtual whiteboard as needed</p> <p><b>Duration:</b> Up to 90 minutes per leader; up to 60 minutes per staff</p>	Once a year over the course of the pilot period
Survey of local TANF program and partner leaders	Instrument 2: Leadership survey	<p><b>Respondents:</b> County-level TANF program and partner leaders and supervisors</p> <p><b>Content:</b> Background and job responsibilities; leadership skills and capacities; service delivery; experiences and perceptions of the TANF programs and pilots.</p> <p><b>Purpose:</b> Provide insight into how program structure, staffing, and leadership might affect planning and implementation of the pilots. Describe leaders' roles, experiences, and perceptions before and after pilot implementation. Compared with the semi-structured discussions, described above, the survey will enable the collection of information (1) in a quantifiable format, (2) on topics that</p>	<p><b>Mode:</b> Web-based</p> <p><b>Duration:</b> 20 minutes</p>	Twice over the course of the pilot period

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<b>Data Collection Activity</b>	<b>Instruments</b>	<b>Respondent, Content, Purpose of Collection</b>	<b>Mode and Duration</b>	<b>Frequency</b>
		leaders might be uncomfortable talking about in a group setting, and (3) from a broader set of leaders than would have the time to participate in a semi-structured discussion.		
Survey of TANF program and partner staff	Instrument 3: Staff survey	<p><b>Respondents:</b> County-level TANF program and partner staff</p> <p><b>Content:</b> Background and job responsibilities; service delivery; staff experiences and perceptions of the TANF programs and pilots.</p> <p><b>Purpose:</b> Provide insight into how program structure, staffing, and leadership might affect planning and implementation of the pilots. Describe staff roles, experiences, and perceptions before and after pilot implementation. Compared with the semi-structured discussions, described above, the survey will enable the collection of information (1) in a quantifiable format, (2) on topics that staff might be uncomfortable talking about in a group setting, and (3) from a broader set of staff than would have the time to participate in a semi-structured discussion.</p>	<p><b>Mode:</b> Web-based</p> <p><b>Duration:</b> 20 minutes</p>	Twice over the course of the pilot period
Survey of TANF program and partner staff on how they spend their time	Instrument 4: Staff time use survey	<p><b>Respondents:</b> County-level TANF program and partner staff</p> <p><b>Content:</b> How staff time is allocated to different work activities; staff workload and caseloads.</p> <p><b>Purpose:</b> Describe staff roles, time use, and workloads before and during pilot implementation.</p>	<p><b>Mode:</b> Web-based</p> <p><b>Duration:</b> 10 minutes</p>	Nine times over the course of the pilot period
Systematic documentation of pilot costs and resources	Instrument 5: Pilot costs and resources workbook	<p><b>Respondents:</b> State- and county-level TANF program and/or relevant partner leaders</p> <p><b>Content:</b> Pilot start-up and ongoing implementation costs and program resource allocation.</p> <p><b>Purpose:</b> Describe the allocation of program resources and costs before and after pilot implementation.</p>	<p><b>Mode:</b> Excel-based</p> <p><b>Duration:</b> 4 hours</p>	Three times over the course of the pilot period
In-depth	Instrument 6:	<b>Respondents:</b> Select TANF program	<b>Mode:</b> Phone- or web-	Two waves over

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<b>Data Collection Activity</b>	<b>Instruments</b>	<b>Respondent, Content, Purpose of Collection</b>	<b>Mode and Duration</b>	<b>Frequency</b>
interviews with TANF program participants	In-depth participant interview guide	<p>participants</p> <p><b>Content:</b> Program participants' background and goals, experiences and challenges with the program, and perceptions of the program.</p> <p><b>Purpose:</b> Describe participant experiences with pilot implementation. Provide insight into how program structure and service delivery might affect implementation of the pilots.</p>	<p>based</p> <p><b>Duration:</b> 75 minutes</p>	the course of the pilot period, participants will be recruited to respond to one wave

**Outcomes Study**

The outcomes study will document how the shift from the WPR to outcomes-based accountability affects TANF participants' key outcomes – as outlined in the FRA legislation – including their employment, family stability, and self-sufficiency.

TANF recipients identified through the previously approved Study information form (OMB #0970-0356) will be invited to participate in a 12-month post-TANF-exit survey. Of these TANF recipients, the team will reach out to two groups who exit the program during the study period. The first group will be TANF recipients who exited the program before states implemented their pilot programs and while states were still accountable for the WPR (prior to October 1, 2025). The second group will be TANF recipients who exit the program during the pilot period (after September 30, 2026). The outreach activities for identifying potential respondents were approved under the generic clearance referenced in A2.

The study team will then use a quasi-experimental design to compare outcomes of the people in these two groups. The outcomes study is intended to produce internally valid estimates of participant outcomes in pilot states, not to promote statistical generalization to other sites or service populations. Further details on the appropriateness and limitations of the study design are provided in Section B.1 of this ICR.

Table A.2. summarizes the proposed data collection activities for the outcomes study.

**Table A.2. Data collection activities for the outcomes studies**

<b>Data Collection Activity</b>	<b>Instrument</b>	<b>Respondent, Content, Purpose of Collection</b>	<b>Mode and Duration</b>	<b>Frequency</b>
Survey of former TANF participants 12 months after program exit	Instrument 7: 12-month post-TANF-exit survey	<p><b>Respondents:</b> TANF recipients who exited the program 12 months prior to survey administration and who previously provided contact information through the approved Study information form (OMB #0970-0356) and agreed to be contacted for this survey.</p> <p><b>Content:</b> Data on outcomes of interest, including employment, earnings, economic independence, well-being, health status, and family characteristics</p>	<p><b>Mode:</b> Self-administered web-based survey with the option to complete over the phone with a study team interviewer</p> <p><b>Duration:</b> Up to 45 minutes</p>	Two waves over the course of the pilot period, participants will respond to one wave based on their TANF exit date

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Data Collection Activity	Instrument	Respondent, Content, Purpose of Collection	Mode and Duration	Frequency
		<p><b>Purpose:</b> To estimate program impacts on outcomes of interest including employment that are not captured in administrative data; estimate the program impacts on the services respondents receive; and describe the study sample.</p>		

*Other Data Sources and Uses of Information*

The proposed IC will build on information collected or expected to be collected under two formative ICs that were approved under ACF’s generic clearance for Formative Data Collections for ACF Research (OMB #0970-0356): the Pilot Assessment Activities and the Study information form.

The study will also collect administrative data on TANF participants’ quarterly earnings, receipt of unemployment insurance, and new hires from the National Directory of New Hires (NDNH), which is maintained by the Office of Child Support Enforcement (OCSE) at ACF. This information is already being collected through an existing Memorandum of Understanding between OFA and OCSE. The study team members with access to the ACF network (using Government Furnished Equipment and Personal Identify Verification cards) have been added as users to this agreement and granted access to certain analysis files. The study team will also collect records on the receipt of TANF program services from state and local TANF agencies. In addition, as applicable and informative to the programs’ theories of change, data might also be collected on receipt of Supplemental Nutrition Assistance Program (SNAP) benefits and health care outcomes (Medicaid enrollment) from state-level data systems.

**A3. Use of Information Technology to Reduce Burden**

The data collection activities described in tables A.1 and A.2 reflect sensitivity to issues of efficiency, accuracy, and respondent burden. All proposed surveys (Instruments 2, 3, 4, and 7) are web-based surveys. Web-based surveys are an attractive option for respondents, particularly when the surveys include sensitive questions, and adjust the question flow based on respondents’ answers. As a result, web-based surveys can decrease respondent burden and improve data quality. The web-based program automatically skips questions that are not relevant to a particular respondent type. In addition, data checks can be programmed into the survey to eliminate responses that are considered out of range or conflict with one another. Respondents can also access the web-based surveys from various settings using their own devices, allowing them to complete the surveys at a time and location that is most convenient for them.

With respondent approval, the study team will record the web-based interviews using features of the virtual meeting software and audio record the in-person interviews. These recordings can assist in minimizing burden as verbatim transcripts will be made, decreasing the need for the interviewer to ask the respondent to repeat themselves to ensure the notes are accurate. Similarly, during discussions with respondents (Instrument 1), the study team may use a web-based whiteboard platform such as Mural that facilitates collaborative participation. Notes from the discussion using the whiteboard platform will be saved, which can also minimize respondent burden, decreasing the need for the facilitator to ask participants to repeat themselves to ensure accurate notes.

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A Microsoft Excel-based data collection tool will be used to collect data through the cost and resources workbook (Instrument 5). To reduce respondent burden, in advance of administering the instrument, the study team will ask program leaders to share their accounting records or financial reports, such as the ACF-196 financial reporting form (OMB #0970-0446), and obtain as much information as possible from these records to complete the workbook. If additional information is needed after reviewing any shared records or reports, the study team will ask the programs to complete the remaining sections of the workbook. Formatting including drop-down lists, data checks and data validation, and layout built into the template will assist staff in efficiently completing it and promoting data quality.

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

Existing and similar information may include sources such as State TANF Plans that are required by ACF; the Welfare Rules Database funded by ACF that reports TANF policies for all 50 states, the District of Columbia, and territories that operate TANF programs; and OFA's State TANF Data and Reports that report information on caseloads, expenditures, and work participation. This information may contribute to the quality or completeness of this request, but it cannot be modified for the specific purposes described in A2. To our knowledge, this request is the only data collection that is designed specifically to evaluate these new TANF pilots prior to and during their operation.

The information on employment that will be collected from both administrative records (NDNH data) and a survey (Instrument 7) will be complementary, and not duplicative, because two data sources are necessary to collect accurate and complete information on all types of jobs. NDNH data will provide information on quarterly earnings from jobs covered by unemployment insurance as well as new hires. The survey will collect information that is not included in the NDNH data, such as all jobs held, including those not covered by unemployment insurance, as well as the characteristics of jobs (such as the wage rate, hours worked, and benefits offered).

None of the data collected under the previously approved generic clearances (see A2) will be duplicated in this request.

### **A5. Impact on Small Businesses**

Small organizations, such as businesses or nonprofit organizations, might be involved in helping a state or local TANF agency implement their pilot program. If small organizations are involved, we will minimize the burden for respondents by collecting data at times convenient for the respondents and requesting only the most essential information that cannot be collected from another respondent and/or organization.

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

For the outcomes study, conducting the 12-month post-TANF-exit survey (Instrument 7) in two waves is necessary to capture data from both a comparison group (individuals who exited TANF prior to implementation of the pilots) and a treatment group (individuals who exited TANF during the pilot period). Collecting data from both groups enables the study to examine differences in post-exit outcomes that may be associated with the pilot programs. If the survey were conducted less frequently and data were collected from only one group, the study would lack an appropriate comparison group, substantially limiting the rigor of the evaluation.

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The implementation study data collection activities need to occur at multiple points throughout the pilot to document the evolution of the pilots over time and to document changes in the pilots' context, design, and implementation as described in the following bullets.

- **Discussions with program administrators, staff, and partners (Instrument 1):** Conducted annually throughout the pilot period to capture changes in pilot design and implementation, with more comprehensive discussions during planning/start-up, early implementation, and steady-state implementation, and targeted discussions in interim periods.
- **Leadership and staff surveys (Instruments 2 and 3):** Administered twice—during the pilot planning year and the fourth year of pilot implementation—to document staff background, roles, and perceptions before and after full implementation.
- **Staff time use survey (Instrument 4):** Administered every six months throughout the pilot period to track changes in staff time use. When timing aligns, it will be administered alongside the leadership and staff surveys for TANF program and partner staff.
- **Cost and workload data collection (instrument 5):** Administered three times—during the pilot planning year and the second and fourth years of pilot implementation—to document changes in pilot costs and workload over time.
- **In-depth participant interviews (Instrument 6):** Conducted twice—during the first and fourth years of pilot implementation—to document participant experiences during early and steady-state implementation.

### 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 IC activity. This notice was published on March 27, 2026 (91 FR 14859) and provided a sixty-day period for public comment. During the notice and comment period, no comments were received.

#### *Consultation with Experts Outside of the Study*

Consultation with experts outside of the study was not conducted because the study team includes staff with the requisite subject matter knowledge and methodological expertise necessary to design and implement the study.

### A9. Tokens of Appreciation

The proposed tokens of appreciation are designed to increase overall response rates to data collection for TANF program participants and to reduce potential costs associated with more intensive follow-up data collection methods such as in-person locating. Concern about the potential for low overall response rates is particularly relevant to this study because TANF program participants tend to be a highly mobile, hard-to-reach population<sup>2</sup>. Several factors could complicate tracking this population over time including:

- System fatigue from repeated interactions with multiple service, administrative, or research requests over time

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<sup>2</sup> Administration for Children and Families, Office of Family Assistance. *Housing Status Assessment Guide for State TANF and Medicaid Programs*. U.S. Department of Health and Human Services, 2016.

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- Unstable housing
- Fewer records in databases that researchers typically use to identify participants and their addresses due to a decreased use of leases, public accounts such as utilities, cell phone contracts, and credit reports
- Use of aliases because of poor credit and prior payment issues

Survey results may be biased if respondents differ from non-respondents. This risk is amplified when response rates are low, as fewer responses increase the potential for systematic differences between respondents and non-respondents<sup>3</sup>. Similar studies have found that including a token of appreciation results in higher rates of survey completion.<sup>4,5</sup> In addition to improving response rates, tokens of appreciation have been found to reduce nonresponse bias and improve survey representativeness, especially in populations defined as low income, such as those in this study, by encouraging those typically less interested in research to participate.<sup>6</sup>

The study team proposes offering a \$75 token of appreciation for completing the 12-month post-TANF-exit survey which is estimated to take up to 45 minutes to complete. The previously approved Study information form offers a \$20 token of appreciation which may make respondents more likely to complete the 12-month post-TANF-exit survey with the promise of an additional token of appreciation because there is an established pattern of receiving tokens for completing earlier data collection requests. OMB previously approved \$70 tokens of appreciation for a follow-up survey on Employment Coaching for TANF and Related Populations (OMB #0970-0506), approved in 2022 and successfully collected follow-up survey data with a 76% response rate. While this was a longer-term follow-up (48 months after program entry for most study members, depending on the time of study enrollment), it is a relevant example because the 12-month post-TANF-exit survey for this study involves less frequent engagement from the study team such as additional surveys or touchpoints prior to the 12-month survey and thus requires a higher token of appreciation to ensure adequate response rates among a hard-to-reach population. The modest increase from \$70 to \$75 helps to account for increases in the cost of living over the past three years.

The study team is also proposing to offer a \$60 token of appreciation to participants of the in-depth interviews, which are estimated to take 75 minutes to complete. The proposed tokens are intended to offset costs of participation in the study such as time away from work or finding arrangements for participating such as internet or phone usage. Interview data will not be representative in a statistical sense, in that they will not be used to make statements about the prevalence of experiences for the entire TANF population. However, it is important to recruit participants with a range of background characteristics to capture a variety of possible experiences with the TANF program. Without offsetting the direct costs incurred by respondents for participating in the interviews, such as arranging time off

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<sup>3</sup> What Works Clearinghouse. (2022). *What Works Clearinghouse Procedures and Standards Handbook (Version 5.0)*. U.S. Department of Education, Institute of Education Sciences. Retrieved from [https://ies.ed.gov/ncee/wwc/Docs/referenceresources/Final\\_WWC-HandbookVer5\\_0-0-508.pdf](https://ies.ed.gov/ncee/wwc/Docs/referenceresources/Final_WWC-HandbookVer5_0-0-508.pdf) [ies.ed.gov]

<sup>4</sup> Yu, S., Alper, H. E., Nguyen, A. M., Brackbill, R. M., Turner, L., Walker, D. J., ... & Zweig, K. C. (2017). The effectiveness of a monetary incentive offer on survey response rates and response completeness in a longitudinal study. *BMC medical research methodology*, 17(1), 1-9.

<sup>5</sup> Abdelazeem, B., et al. (2023). Does usage of monetary incentive impact the involvement in surveys? A systematic review and meta-analysis of 46 randomized controlled trials. *PLOS ONE*, 18(1), e0279128. <https://doi.org/10.1371/journal.pone.0279128>

<sup>6</sup> Singer, E., and Kulka, R.A. (2002). Paying Respondents for Survey Participation. In M. Ver Ploeg, R.A. Moffitt, and C.F. Citro (Eds.), *Studies of Welfare Populations: Data Collection and Research Issues. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs* (pp. 105-128). Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press.

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from paid work, the research team increases the risk that only those individuals able to overcome the financial barriers to participate will agree to an interview, which would reduce the overall quality of the qualitative data collection. For in-person participant in-depth interviews, OMB previously approved \$60 tokens on Employment Coaching for TANF and Related Populations (OMB #0970-0506) and the Next Generation of Enhanced Employment Strategies Project (OMB #0970-0545). Both of these studies using a \$60 token were able to successfully recruit and complete interviews with a robust sample of participants. Although the proposed data collection is not in-person, the amount of the proposed tokens was retained to account for increases in the cost of living over the past three years.

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

*Personally Identifiable Information*

The 12-month post-TANF-exit survey will use the personally identifiable information (PII) collected through the Study information form (OMB #0970-0356) to ensure that the prospective respondent has not already enrolled in the study or completed a survey; to help the study team locate respondents to complete the 12-month post-TANF-exit survey; and to allow the study team to link participants to their corresponding administrative data. See A11 for further details on sensitive information.

The study team will collect the names, work phone numbers, and work email addresses of program administrators, staff, and partners to schedule site visits, discussions, and interviews; to administer the Leadership and Staff surveys; and to collect the Pilot costs and resources data. While this data is PII, it is typically less sensitive in nature because agencies may list it in public places such as agency websites. The study team will also collect names and contact information for TANF recipients to schedule in-depth interviews.

**Table A.3. Summary of PII to be Included and Intended Use**

<b>PII</b>	<b>Intended Use</b>
First and last name	Contact information for program staff will be collected to schedule site visits, discussions, and interviews.
Phone number (Work)	
Email address (Work)	

*Assurances of Privacy*

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data and that their participation is voluntary.

At least some of the information collected under this ICR will likely be retrieved by an individual's personal identifier in a way that triggers the Privacy Act of 1974, as amended (5 U.S.C. 552a). The system of records notice (SORN) for this collection is OPRE Research and Evaluation Project Records, 09-80-0361. Each individual will be provided with information that complies with 552a(e)(3) prior to being asked for information that will be placed into that system of records. This means respondents will receive information about the authority, the purposes for use, the routine uses, that the request is voluntary, and any effects of not providing the requested information.

Due to the sensitive nature of this research (see A11 for more information), the study team obtained a Certificate of Confidentiality from the National Institutes of Health (Number CC-OD-26-7836), approved 2/9/2026. The Certificate of Confidentiality helps to assure participants that their information will be kept private to the extent permitted by law. This study team is also seeking approval from the Health

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Media Lab Institutional Review Board (IRB). Data collection will not begin until IRB approval has been received.

### *Data Security and Monitoring*

As specified in the contract, the Contractor shall protect respondent privacy and will comply with all Federal and Departmental regulations for private information. The Contractor shall ensure that all 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. Beginning in FY 23, all awarded contracts are required to go through the Assessment and Accreditation (A&A) process and obtain a three (3) year Authority to Operate (ATO) if required by ACF Tech. The study team obtained a 6-month provisional ATO granted in April 2026.

As specified in Mathematica's contract, the Contractor shall use Federal Information Processing Standard (FIPS) and National Institute of Standards and Technology (NIST) Special Publication (SP) 800.53 rev 5 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; and 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 NIST requirements and other applicable Federal and Departmental regulations. In addition, the Contractor must submit a plan for 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.

As specified in the contract, Mathematica will comply with all Federal and departmental regulations for private information. Mathematica has developed a data safety and monitoring plan that assesses all protections of respondents' PII. Mathematica will ensure that all its employees who perform work under this contract are trained in data privacy issues and comply with the above requirements. All study staff with access to PII will receive study-specific training on (1) limitations on disclosure; (2) safeguarding the physical work environment; and (3) storing, transmitting, and destroying data securely.

Furthermore, PII is stored separately from other project data. Access to respondents' contact information is restricted to those on the study team. Any files containing PII are stored on Mathematica's network in a secure project folder whose access is limited to select authorized project team members. **Only the principal investigator, project director, and key study staff have access to this folder.** Furthermore, approved study team members can only access this folder after going through multiple layers of security, including being connected to Mathematica's Virtual Private Network (VPN). A secure FTP site (Box.com) will be used to transfer data from states to the project team, which will contain as limited PII as possible. Box Enterprise Cloud Content Collaboration Platform is certified through the Federal Risk and Authorization Management Program (FedRAMP) at a high impact level. The surveys will only collect the minimum PII necessary for the project. Survey data will be collected using a secure tool and data will be encrypted in transit and at rest. Access to the survey tool will be limited to only authorized project staff with a need to know.

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At the end of the study, de-identified project data may be archived in a repository such as the Child and Family Data Archive at the University of Michigan to make them available to other researchers. Mathematica will work with ACF to develop a comprehensive data archive plan and to produce an archive data file or files. Any restricted- or public-use files will be reviewed for appropriateness of public or restricted release, including appropriate masking techniques for each level of release. A non-disclosure review will also be conducted to ensure that the data cannot be used to re-identify respondents.

**A11. Sensitive Information**<sup>7</sup>

This study proposes to collect information on sensitive topics as described in table A.4. It is necessary to collect this information to sufficiently describe the study population, support analytic assessment and adjustment in a quasi-experimental design, and document the outcomes of the pilot programs.

**Table A.4. Summary of Sensitive Topics and Justification for Inclusion**

<b>Topic</b>	<b>Instrument(s)</b>	<b>Justification for Inclusion</b>
Economic hardship	12-month post-TANF-exit survey and In-depth participant interviews	Includes items such as missing meals or needing to borrow money from friends to pay for necessities. These outcomes reflect a lack of self-sufficiency and may affect housing stability, a key outcome of the study.
Housing stability	12-month post-TANF-exit survey and In-depth participant interviews	Key outcome of the study.
Government services received	12-month post-TANF-exit survey and In-depth participant interviews	Key outcome of the study.
Mental and physical health	12-month post-TANF-exit survey and In-depth participant interviews	Information about physical and mental or other health issues; the severity of those issues; and how much they impact the ability to work. All of these are important potential challenges to finding or maintaining employment and could play a role in the effectiveness of the program.
Opinions on program and leadership	Leadership and Staff Survey	To provide insight into how program structure, staffing, and leadership might affect planning and implementation of the pilots.
Perceptions of TANF services	In-depth participant interviews	To provide insight into how participants experience the program during the pilot period.

Respondents, the TANF participants in particular, may feel uncomfortable answering some of the questions on the surveys and in the In-depth participant interviews that address sensitive topics. To minimize this risk, respondents will be told they can skip any questions they do not want to answer. For phone and field administration of the 12-month post-TANF-exit survey and interviewer-led In-depth participant interviews, the study team will train all staff on best practices for dealing with sensitive

<sup>7</sup> 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.

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questions and situations. TANF participant respondents will also be told they are allowed to end their participation in the study at any time without affecting any government services they receive.

Prior to collecting data, the study team will collect consent from TANF participants and program staff. The consent forms state that answers will be kept private to the extent permitted by law and respondents' PII will not be seen by anyone outside of the study team, that participation is voluntary, and that they may refuse to participate at any time without penalty. They will be informed that, to the extent permitted by law, individual identifying information will not be released or published; rather, data collected will be published only in summary form with no identifying information at the individual level. It will be made clear to respondents that identifying information will be kept separate from the surveys.

The study team is in the process of obtaining approval from the Health Media Lab IRB.

### A12. Burden

#### *Explanation of Burden Estimates*

Table A.5 reflects the estimated burden and costs for IC proposed in this ICR for the five years of data collection. These estimates were produced based on knowledge from past studies and feedback from a relevant stakeholder organization, American Public Human Services Association (APHSA), that serves as a subcontractor to Mathematica.

Burden estimates for the instruments in this request are as follows:

- **Discussions with TANF program leaders, staff, and partners.** The study team expects to interview 560 staff from the five TANF pilot programs (112 per state), which includes up to 50 state-level leadership staff, 200 local-level leadership staff, 10 data specialists, 100 supervisors, and 200 direct service staff. All staff will be interviewed up to six times over the course of the study (including the end of the pilot planning year and over the course of the five years of the pilots' implementation). The study team expects interviews for state and local-level leadership staff to last 1.5 hours and interviews with data specialists, supervisors, and program staff to last 1 hour.
- **Leadership survey.** The study team expects to conduct the leadership survey with 1,000 staff from the five TANF pilot programs (200 per state), which includes 500 local-level leadership staff and 500 supervisors. The leadership survey will be conducted twice over the course of the study and it will last .33 hours each time.
- **Staff survey.** The study team expects to conduct the staff survey with 2,140 TANF program and partner staff from the five TANF pilot programs (428 per state). The staff survey will be conducted twice over the course of the study and it will last .33 hours each time.
- **Staff time use survey.** The study team expects to conduct the staff time use survey with 2,140 TANF program and partner staff from the five TANF pilot programs (428 per state). The time use survey will be conducted 9 times over the course of the study and the study team expects it to take .17 hours. When administration of the time use survey coincides with the staff survey, the two surveys will be administered together for staff with a burden of 0.5 hours.
- **Pilot costs and resources workbook.** The study team expects to conduct the pilot costs and resources workbook with 20 TANF program and partner staff from the five TANF pilot programs (4 per state). The workbook will be completed 3 times over the course of the study and we expect it to take 4 hours.

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- **In-depth participant interviews.** The study team expects to interview 100 TANF participants from the five TANF pilot programs (20 per state). We plan to interview each participant once and expect the interviews to last for 1.25 hours.
- **12-month post-TANF-exit survey.** Former TANF participants identified through the approved *Study information form* (OMB #0970-0356) will be invited to complete the 12-month post-TANF-exit survey for the outcomes study. The study team expects about 3,000 respondents (600 in each of the five TANF pilot states) will complete the 12-month post-TANF-exit survey. The study team expects the survey to last .75 hours and each respondent will complete the survey once.

### *Estimated Annualized Cost to Respondents*

The total annual cost for data collection instruments in this request is \$120,760. To generate the estimated annualized cost to respondents, the project team consulted the Bureau of Labor Statistics' average wage rates by North American Industry Classification System (NAICS) business code from the Bureau of Labor Statistics' Occupational Employment and Wage Statistics, last updated May 2025. Cost estimates for participating in interviews for the assessment guide were calculated using the following wage rates:

- State-level TANF leaders: the average hourly wage for state government social and community services managers is \$46.30 (NAICS 999200, 11-9151<sup>8</sup>)
- Local-level TANF leaders: the average hourly wage for local government social and community services managers is \$52.07 (NAICS 999300, 11-9151<sup>9</sup>)
- Data specialists: the average hourly wage for information and records clerks, all other is \$22.80 (NAICS, 813400 43-4199<sup>10</sup>)
- Supervisors: the average hourly wage for social and community service managers is \$38.66(NAICS 813400, 11-9151)
- Program staff: the average hourly wage for service providers- counselors, social workers, and other community and social services specialists is \$22.35 (NAICS 813400, 21-1000)
- TANF participants: the average hourly wage for TANF participants is estimated to be \$7.25, the current federal minimum wage

Note: *Instrument 1. Pilot staff discussion guide* will be used with all categories of staff respondents, including State-level TANF leaders, Local-level TANF leaders, Data specialists, and Program staff. Questions will be tailored by staff type; discussions with state and local level TANF leaders will be 1.5 hours while discussions with data specialists, supervisors, and program staff will be one hour. Other instruments, such as *Instrument 2. Leadership survey* will also be completed by respondents from different staff categories including Local-level TANF leaders and Supervisors. The following table is broken out to acknowledge the different wage rates and response lengths.

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<sup>8</sup> [State Government, excluding Schools and Hospitals \(OEWS Designation\) - May 2025 OEWS Industry-Specific Occupational Employment and Wage Estimates](#)

<sup>9</sup> [Local Government, excluding Schools and Hospitals \(OEWS Designation\) - May 2025 OEWS Industry-Specific Occupational Employment and Wage Estimates](#)

<sup>10</sup> [Civic and Social Organizations - May 2025 OEWS Industry-Specific Occupational Employment and Wage Estimates](#)

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**Table. A.5. Respondent burden**

<b>Instrument</b>	<b>Respondent</b>	<b>No. of Respondents</b>	<b>No. of Responses per Respondent (Total)</b>	<b>Avg. Burden per Response (in hours)</b>	<b>Total Burden Hours</b>	<b>Annual Burden Hours</b>	<b>Average Hourly Wage Rate</b>	<b>Total Annual Respondent Cost</b>
Instrument 1: Pilot staff discussion guide	State-level leadership staff	50	6	1.5	450	90	\$46.30	\$4,167
	Local-level leadership staff	200	6	1.5	1,800	360	\$52.07	\$18,745
	Data specialists	10	6	1	60	12	\$22.80	\$274
	Supervisors	100	6	1	600	120	\$38.66	\$4,639
	Program staff	200	6	1	1,200	240	\$22.35	\$5,364
Instrument 2: Leadership survey	Local-level leadership staff	500	2	0.33	330	66	\$52.07	\$3,437
	Supervisors	500	2	0.33	330	66	\$38.66	\$2,552
Instrument 3: Staff survey	Program staff	2,140	2	0.33	1,412	282	\$22.35	\$6,313
Instrument 4: Staff time use survey	Program staff	2,140	9	.17	3,274	655	\$202.35	\$14,636
Instrument 5: Pilot costs and resources workbook	State-level leadership staff	10	3	4	120	24	\$46.30	\$1,111
	Local-level leadership staff	10	3	4	120	24	\$52.07	\$1,250
Instrument 6: In-depth participant interview guide	Participants	100	1	1.25	125	25	\$7.25	\$181
Instrument 7. 12-month post-TANF-exit survey	Participants	3,000	1	.75	2,250	450	\$7.25	\$3,263
<b>Total:</b>		<b>8,960</b>	<b>53</b>		<b>12,072</b>	<b>2,414</b>		<b>\$65,931</b>

Note: Annual burden is calculated based on 5 years of data collection. An extension request will be submitted to OMB within 3 years of initial approval.

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**A13. Costs**

There are no additional costs to respondents.

**A14. Estimated Annualized Costs to the Federal Government**

Table A.6 provides estimates of annual costs to the Federal government. The field work category includes all costs related to collecting data for the implementation and outcomes studies, including staff time, tokens of appreciation, and travel costs. The reporting and analysis category includes the costs associated with analyzing and reporting on all data collected throughout the study period (2026-2032), including interim and final reports, briefs, and other dissemination products.

**Table A.6. Costs by category**

<b>Cost Category</b>	<b>Estimated Costs</b>
Field Work	\$4,207,348.00
Reporting and Analysis	\$1,910,957.00
<b>Total costs over the study period (6 years)</b>	\$6,118,305.00
<b>Annual costs</b>	\$1,019,717.50

**A15. Reasons for changes in burden**

This is a new IC request.

**A16. Timeline**

Pending OMB approval of this ICR, the study team anticipates beginning the first round of implementation study data collection shortly after the end of the pilot planning year, in late early fall 2026. Subsequent implementation study data collection will occur annually before the end of each pilot implementation year, around August or September of each year, to document changes over time.

The study team will conduct the first 12-month post-TANF-exit survey in summer 2027, approximately 12 months after the first group of former TANF participants was identified through the Study information form (OMB # 0970-0356). A second group of former TANF participants, consisting of those exiting TANF programs during the third year of the pilot, will be identified in summer 2029, and their 12-month post-TANF-exit survey will be administered in summer 2030. An extension request will be submitted to OMB within 3 years of initial approval.

Findings from the project will be published throughout the study in technical reports and briefs. Reporting on early implementation study findings will occur in 2027. Reporting on final implementation study and outcomes study findings will occur in 2032.

The study team anticipates that data archives (restricted or public use) would become available on a rolling basis in 2031, the final pilot implementation year, and hosted on a data archive platform such as the Child and Family Data Archive at the University of Michigan

**A17. Exceptions**

No exceptions are necessary for this IC.

**Attachments**

- Instrument 1: Pilot staff discussion guide

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- Instrument 2: Leadership survey
- Instrument 3: Staff survey
- Instrument 4: Staff time use survey
- Instrument 5: Pilot costs and resources workbook
- Instrument 6: In-depth participant interview guide
- Instrument 7: 12-month post-TANF-exit survey
  
- Appendix A: Notifications for 12-month post-TANF-exit survey
- Appendix B: Recruitment and scheduling materials for pilot staff discussions
- Appendix C: Notifications for leadership, staff, and time use surveys
- Appendix D: Outreach materials for pilot costs and resources workbook
- Appendix E: Recruitment and scheduling materials for in-depth participant interviews