

Subsidized and Transitional Employment Demonstration and Evaluation Project (STEDEP)

Supporting Statement for OMB Clearance Request

Part A: Justification for the Collection of Baseline Data

June 2010

A1. Circumstances Making the Collection of Information Necessary

STEDEP is a demonstration evaluation designed to rigorously test innovative subsidized employment strategies aimed at successfully transitioning individuals in several low-income target populations from short-term subsidized employment to unsubsidized employment in the regular labor market. We are interested in tests of employment programs that offer opportunities for productive work; strategies that couple work experience with wrap-around support services (e.g., child care assistance, skills training, job search assistance, career advancement services); strategies that incorporate pre-employment activities; and strategies that target specific low-income populations, including welfare recipients, low-income non-custodial parents, prisoners re-entering the community, low-income youth transitioning to the labor force, low-income individuals with disabilities, American Indians and Alaska Natives, and English language learners.

The project will begin with an exploratory phase to obtain feedback from program administrators and staff; researchers; and policymakers about strategies they believe are worth studying, in terms of effectiveness and impact on families and individuals. ACF is interested in getting assessments and educated opinions on the most important types of strategies that should be tested around the country within the context of current TANF policies and requirements as well as recent efforts under the American Recovery and Reinvestment Act (ARRA). The project aims to test strategies that are of high interest to the field, so program level feedback on types of strategies that should be experimentally tested is a necessary first step for the study. In addition, ACF will undertake an assessment of the field to determine the breadth and quality of subsidized employment strategies for low-income populations, especially in the context of ARRA. Any strategies or promising subsidized and transitional employment approaches being implemented might be appropriate as demonstration sites for the evaluation; thus, this inquiry is a critical first step for demonstration program recruitment into the study.

To accomplish this objective, ACF seeks approval of the proposed discussion guides to be used in telephone and in-person informal discussions with a range of experts and stakeholders such as researchers, policy experts, coordinators (e.g. state-level coordinators), subsidized and transitional employment program directors and staffs.

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.

The information collection protocols will be used to collect information from key respondents about strategies they believe are worth studying, in terms of effectiveness and impact on families and individuals. The information will be used to identify the types of programs/strategies that should be tested within the context of current TANF policies and requirements as well as recent efforts under ARRA. In addition, the information will be used

to determine the breadth and quality of subsidized employment strategies for low-income populations, especially in the context of ARRA.

A subsequent submission will seek clearance for information collection activities related to the effectiveness of the subsidized employment strategies/programs studied.

A2. Purpose and Use of the Information Collection

The purpose of this information collection is to help ACF identify and select subsidized and transitional employment programs for evaluation and to assess the breadth and quality of these programs in the context of ARRA. This early assessment of the implementation of ARRA-funded approaches will support the development of the impact evaluation as well as inform ACF of the current state of subsidized employment efforts.

This information collection request includes discussion guides that will be used in telephone and/or on-site interviews with experts and stakeholders such as researchers, policy experts, coordinators (e.g. state-level coordinators), subsidized and transitional employment program directors and staffs.

As stated above, the information will be used to identify the types of programs/strategies that should be tested within the context of current TANF policies and requirements as well as recent efforts under ARRA. In addition, the information will be used to determine the breadth and quality of subsidized employment strategies for low-income populations, especially in the context of ARRA.

A3. Use of Improved Information Technology and Burden Reduction

The information will be collected through semi-structured discussions that are not conducive to information technology, such as computerized interviewing.

A4. Efforts to Identify Duplication and Use of Similar Information

The information collection will not duplicate information that is already available. Literature reviews and recent studies have been and will continue to be consulted (and, where necessary, additional review will be conducted) to assess what is currently known about subsidized and transitional employment programs within the context of current TANF policies and requirements as well as recent efforts under ARRA.

A5. Impact on Small Businesses or Other Small Entities

Not applicable. No small businesses are expected to be involved.

A6. Consequences of Collecting Information Less Frequently

During this initial step of the evaluation, information will be collected only once, thus no repetition of effort is planned. Not collecting the information at all would substantially limit the value of the investment ACF will make in this study. Identifying interventions of most interest to the field is crucial to ensuring that findings from the study are relevant to federal, state and local policymakers and program administrators. Further, an assessment of the current implementation of subsidized employment approaches for populations of interest to ACF will inform ongoing policy development.

A7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances for the proposed data collection.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

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 July 7, 2010, Volume 75, Number 129, page 39020, and provided a sixty-day period for public comment. A copy of this notice is attached.

During the notice and comment period, the government received six (6) requests for copies of the instruments. All requests were fulfilled.

A9. Explanation of Any Payment or Gift to Respondents

No payments to respondents are proposed for this information collection.

A10. Assurance of Confidentiality Provided to Respondents

For informal discussions, no personal identifying information beyond name and professional affiliation (e.g., name of the academic/research institution, name of the program, etc.) will be sought. Discussants will be told that their conversations will be kept private to the fullest extent of the law and that it is expected that their name and affiliation will only be included in summary information provided to ACF. ACF staff may participate in telephone or on-site discussions. Discussants will be told that, to the extent allowable by law, individual identifying information will not be disseminated publicly.

A11. Justification for Sensitive Questions

There are no personally sensitive questions in this data collection.

A12. Estimates of Annualized Burden Hours and Costs

This proposed information collection does not impose a financial burden on respondents. Respondents will not incur any expenses other than the time spent answering the questions contained in the discussion guides.

Exhibit A12.1 summarizes the reporting burden on respondents. Response times were estimated from prior experience. The annual burden is estimated from the total number of completed discussions proposed and the time required to complete the discussions. The total annual burden is expected to be 213 hours.

Survey respondents will be researchers, policy experts, coordinators, program directors, and program staff. The total estimated annual cost is \$6,562. The source used to determine the wages were the 2009 Employment and Wages from Occupational Employment Statistics (OES) survey from the Bureau of Labor Statistics. The rate used for Researchers, Policy Experts, and State Level Coordinators, \$33.14, is equivalent to state government managers under SOC code 11-9151. The rate used for Program Directors, \$35.00, is equivalent to the general managers under SOC code 11-1021. The rate used for Program Staff \$27.00 is equivalent to social service workers under SOC code 21-1023.

Exhibit A12.1

Annual Information Collection Burden Estimate

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response	Total Burden Hours	Average Hourly Wage	Total Annual Cost
Discussion Guide for Use with Researchers, Policy Experts, and State Level Coordinators	50	1	1	50	\$33.14	\$1,674
Discussion Guide for Use with Program Directors	25	1	2.5	63	\$35.00	\$2,205
Discussion Guide for Use with Program Staff	50	1	2	100	\$27.00	\$2,400
Total	125	-	-	213	-	\$6,562

A13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

Not applicable. These information collection activities do not place any capital cost or cost of maintaining capital requirements on respondents.

A14. Annualized Cost to the Federal Government

Data collection will be carried out by the contractor selected through a competitive procurement process to conduct the STEDEP evaluation. Information collection may continue for up to two years after award of contract, though most information is expected to be obtained in the first year. Total contractor costs associated with the information collection, compilation, analysis and reporting to ACF have yet to be determined. Based on our experience with other similar information collection activities carried out by contractors, total costs to the government are estimated to be approximately \$200,000. Combined with the costs estimated for federal staff in the Office of Planning, Research and Evaluation in ACF to develop and review and the instruments, total costs are estimated to be \$202,232. Since information collection will occur over two years, annualized costs are estimated to be \$101,116.

A15. Explanation for Program Changes or Adjustments

This submission to OMB is a new request for approval.

A16. Plans for Tabulation and Publication and Project Time Schedule

A16.1 Analysis Plan

This phase of the STEDEP involves collecting information that will be used for selecting sites, specifically identifying promising approaches and selecting the interventions and demonstration programs for the study. As discussed in questions A1 and A2 above, STEDEP is designed to rigorously test innovative subsidized employment strategies aimed at successfully transitioning individuals in several low-income target populations from short-term subsidized employment to unsubsidized employment in the regular labor market. In addition, ACF will undertake an assessment of the field to determine the breadth and quality of subsidized employment strategies for low-income populations, especially in the context of ARRA. This requires a strong intervention identification and development process, involving researchers, policy experts, coordinators, and programs (directors, staff, and participants).

The informal discussions that will be conducted as part of this data collection will be used to help inform the types of interventions the study should examine and to assist in the

identification and selection of demonstration sites as well as to assess the implementation of TANF-and ARRA-funded interventions of interest to ACF. Individual summaries of all discussions and overarching summaries of information obtained from each source/type of stakeholder (e.g., researchers, policymakers, program administrators and staff) shall be prepared by the contractor. The information will be analyzed to identify common themes and specific recommendations of types of approaches to be evaluated and specific programs to be considered.

The information obtained in the interviews will be combined with information obtained from the reviews of existing research (and, as appropriate, from attendance at relevant conferences and meetings) to produce initial recommendations regarding intervention strategy and, as possible, site recommendations and to inform ACF and the field of practitioners on advances and progress in this area of employment and training programming.

A16.2 Time Schedule and Publications

This study is expected to be conducted over a seven-year period beginning September 30, 2010. This OMB submission seeks approval for information collection as part of initial activities of the study, which will occur in the first two years of the project. No formal publications are planned from this information collection.

A17. Reason(s) Display of OMB Expiration Date is Inappropriate

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.