Temporary Assistance for Needy Families (TANF) Data Innovation (TDI) Project

OMB Information Collection Request

New Collection

Supporting Statement

Part A

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Submitted By:
Office of Planning, Research, and Evaluation
Administration for Children and Families
U.S. Department of Health and Human Services

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EXECUTIVE SUMMARY

- **Status of project**
  ACF requests approval for a new information collection to inform its design of technical assistance and training to improve state and local agencies' use of administrative data from the Temporary Assistance to Needy Families (TANF) program.

- **Type of study**
  The TDI Needs Assessment survey will collect descriptive information from state TANF staff about their capacities and challenges using data for program improvement. TDI is not an evaluation study; it is an ACF-sponsored training and technical assistance initiative.

- **Utility of the information collection**
  The information collected will be used by ACF for internal planning purposes and in the provision of technical assistance and training to state and county TANF administrators and staff. This information will also be used in a published report by ACF on shared challenges and opportunities facing states as they improve use of TANF data.

- **Estimation of Burden**
  This information request covers an online survey of TANF administrative and data staff in 54 states and territories. A key contact in each state will be responsible for assigning seven topical modules to subject matter experts among their staff. ACF estimates 108 total burden hours for this information collection.

A1. Necessity for the Data Collection

The Administration for Children and Families (ACF) Office of Planning, Research, and Evaluation (OPRE) at the U.S. Department of Health and Human Services (HHS) seeks approval to conduct a needs assessment as part of the TANF Data Innovation (TDI) project. The purpose is to gather information about state TANF agencies' needs and capacities to set up and operate linked administrative data systems and to use data to improve programs. The primary goal of this information collection is to inform our approach to providing state and county TANF agencies training and technical assistance on using data to build evidence. We also intend to summarize findings from the needs assessment in a published report and use aggregated data for internal ACF planning purposes. ACF/OPRE is seeking permission to contact state TANF agency administrators for this purpose.

Project Background

The TDI project is an investment to expand the integration, analysis, and use of TANF data to improve program administration, payment integrity, and outcomes for participants. Launched in 2017, TDI is sponsored by OPRE in collaboration with the ACF Office of Family Assistance (OFA). To accomplish the stated goals, TDI will provide broad training and technical assistance (TTA) to states and counties on using data for building evidence over a 30-month period. The potential list of TTA topics is very broad, and may cover topics such as: integrating databases, using data and analytics to answer programmatic questions, and presenting findings visually.

The purpose of the current information collection request is to seek approval to gather information about state TANF agencies' data readiness, data usage, and challenges from those agencies' administrators and staff to ensure that the team provides appropriate and useful technical assistance to these agencies.

Legal or Administrative Requirements that Necessitate the Collection
There are no legal or administrative requirements that necessitate this data collection. ACF is undertaking the collection at the discretion of the agency.

A2. Purpose of Survey and Data Collection Procedures

Overview of Purpose and Approach
The TDI project is an investment in technical assistance intended to improve data quality for TANF program administration *and* increase the use of TANF administrative data in human services policy research and program evaluation. The proposed data collection will inform ACF's efforts to support both of these goals. The proposed needs assessment is an online survey targeted at state TANF agencies. Two supplementary data collection components—a review of secondary sources and literature and a series of interviews conducted with external stakeholders (conducted under OPRE's formative generic clearance 0970-0356, approved July 14, 2018)—will add important complementary and contextual information to the data gathered via the survey. All three sources will provide information about state (inclusive of territories and Washington, DC) and, as appropriate, county TANF agencies' data readiness, data usage, and challenges to ensure that the team provides appropriate and useful technical assistance to the agencies.

The project team will employ a three-phase approach to identify priority topics for TA.

Phase 1 consists of reviewing government and related websites and published literature to assemble publicly-available information about states' current data products, documentation, and analytic efforts. This includes a combination of web-scraping and manual archiving from online and public materials. This phase of the project does not impose any burden on respondents or record keepers. Phase 1 of the study has already begun and will continue through Fall, 2019.

Phase 2 was the focus of a prior information collection request (ICR)approved under OPRE's formative generic OMB package (0970-0356), and consists of interview protocols for key groups of stakeholders with interests in seeing state TANF data used effectively to help improve program administration, payment integrity, and outcomes for participants. The stakeholder interviews are being conducted with some current or former state or county TANF administrators and staff, other relevant agency staff, federal agency staff, researchers, members of national organizations with experience and expertise related to TANF, and vendors or firms that have worked with states to develop and maintain their databases. This IC received OMB approval on 07/14/2018 and began shortly thereafter. Stakeholder interviews be crucial in helping to inform the earliest TDI technical assistance efforts. Information collected in this phase will be used for internal ACF planning purposes, and to inform TTA throughout the project.

Phase 3 is the focus of the current ICR. Phase 3 consists of fielding a needs assessment survey that will be completed by state TANF agency administrators and staff to gather more detailed and consistent information about their capacities and challenges using data for program improvement. While the stakeholder interviews address a broad group of high-level stakeholders, the needs assessment survey will be directed to TANF agency administrators and staff with familiarity of day-to-day data operations. High-level administrators from up to 12 state and county TANF agencies will provide narrative information in the previously-approved stakeholder interviews, and the project team will attempt to collect comprehensive needs assessment data from staff from 54 state and territory TANF agencies. Contingent on OMB approval, the needs assessment survey will be fielded as early as possible in 2019. These data will help the team further refine its plan for future TTA topics. We also intend to summarize findings from the needs assessment in a published report, providing a snapshot of shared challenges and opportunities facing states as they seek to improve their data use.

Potential Phase 4: In addition to identifying priority topics for TTA, the TDI project is tasked with examining state practices for assessing payment integrity[1], determining what states are currently doing and how state practices could be improved in the future. The team anticipates this may involve a series of case studies to complement the information gathered through the Needs Assessment survey. If we require collecting uniform information from more than nine individuals, the project team will submit a request for this data collection under ACF's formative generic clearance process. See the following section ***Universe of Data Collection Efforts*** for additional information.

Research Questions

This data collection is intended to answer the following research questions:

- How do state TANF agency administrators and staff assess their agency's current capacity to integrate and use administrative data to improve TANF program outcomes and payment integrity?
- What are state TANF agency priorities for improving use and integration of administrative data?
- What barriers and challenges do agencies face in using TANF administrative data?
- What common needs of TANF agencies could be addressed by technical assistance for data analysis supporting program improvement?

Universe of Data Collection Efforts

To capture current state practice, high-level strategic priorities, and day-to-day practices analyING TANF data for program improvement, we will combine data from publicly available documents,

[1] "Payment integrity" encompasses both accuracy in eligibility determinations and accuracy in benefits calculations.

stakeholder interviews, and the comprehensive needs assessment survey. We may also request approval of an additional formative data collection to describe states' current practices for assessing payment integrity. Each source of data is described below.

Document Review: We are conducting a document scan to identify publicly-available TANF data reports, data documentation, and other published literature that reflect states' current data practices. Because this effort does not impose any burden on respondents or record keepers, there are no associated instruments requiring OMB approval.

Previously Approved Data Collection Instruments

TANF Data Innovation (TDI) Needs Assessment Stakeholder Interviews. The project previously received approval through OPRE's formative generic clearance process for a qualitative interview questions targeting key stakeholders with interests in seeing state/county TANF and related human services data used to improve program administration, payment integrity, and outcomes for participants.

Current Request for Data Collection Instruments

Attachment 1 – TANF Data Innovation (TDI) Needs Assessment Survey. The needs assessment survey instrument is the only instrument requiring approval in the current request.

The needs assessment survey instrument contains eight modules. The first survey module assists the TANF administrator in distributing the seven content modules to appropriate staff. Each topical module is targeted to appropriate subject matter experts within the TANF agencies.

- TANF Data Use and Opportunities
    - This module seeks information about the overall context of data usage throughout the TANF agency, barriers to data use, and opportunities for technical assistance to increase data use capabilities in TANF agencies. It contains questions about: use of data to inform program administration (data availability, data demand, priorities); volume of data use; resources for data usage; barriers to data usage (data, staffing, legal, political, financial, tools); and specific opportunities for TTA to improve data usage.

- Data Collection and Documentation
    - This module seeks information about the TANF agency's data--what is collected, how, and how it is documented and validated. It contains questions about: data available to the agency; data quality (accuracy, timeliness, provenance); and data accessibility and documentation.

- Data Infrastructure
    - This module seeks information about the TANF agency's data infrastructure. It contains questions about: data infrastructure (assessing quality, flexibility, etc. of current systems); data transfer; and interoperability and integration.

- Data Sharing
  - This module seeks information about the status of data sharing practices in the TANF agency. It contains questions about: data sharing activity and practices (interagency, external); value of external data sharing; and barriers to data sharing (demand, technology, staffing, legal, political, financial).

- Research and Analytic Capacity
  - This module seeks information about capacity to conduct research and analysis using TANF data. It contains questions about: staff capacity (skills, tools); access to data (additional sources); data integration; public reporting; partnerships with external parties (academic or research institute); and barriers to research and analysis.

- Federal Reporting
  - This module seeks information about the data states prepare to submit to HHS as part of the TANF and SSP-MOE Data Reports (ACF-199 and ACF-209). It contains questions about: federal reporting burden (current drivers, counterbalancing benefits); quality of federally submitted data; decision to submit sample data (implications for burden), and specific opportunities for TTA in federal reporting.

- Payment Integrity
  - This module seeks information about how states uses data to assess payment integrity. It contains questions about: the payment integrity process (timeliness, accuracy, steps to taken to minimize and identify errors); use of federal and multistate data systems; TANF error rate calculations; and dissemination of best practices for payment integrity.

Future Information Collection Requests

TANF Data Innovation (TDI) Payment Integrity Case studies. The team anticipates that we may supplement payment integrity information from the Needs Assessment Survey with a series of Best Practice case studies. If this requires asking uniform questions of more than nine individuals, the project team will submit a request for this data collection under OPRE's formative generic clearance process. The information potentially collected under this generic would comply with the publication limitations and general purposes of the umbrella formative generic. The individual request will provide more specific information about the uses of the data collected.

A3. Improved Information Technology to Reduce Burden

The burden to participating individuals is minimal and the project team plans to use information technology to reduce it further wherever possible. Wherever possible, the project team will gather information from available online sources, saving respondents from having to address these questions in the needs assessment survey. In addition, the survey design reflects that data-related tasks may be distributed differently among staff in different states. The assignment module is designed to give state TANF administrators an easy way to delegate modules to appropriate subject matter experts within their agency. State TANF adminstrators will receive an email with a hyperlink to a webpage where they can assign the seven content modules to appropriate staff. This page includes a list of content modules, as well as short descriptions, expected time to complete, and recommendations for the type of staff who should complete the module. The introductory email also contains a hyperlink to a landing page that will explain the TDI project. Once the TANF administrator has made assignments, the content modules will be distributed to assigned staff members via email with hyperlinks to the online survey module(s) they have been assigned to complete as well as a hyperlink to the TDI landing page.

A4. Efforts to Identify Duplication
The TDI needs assessment survey builds on a state needs assessment conducted by TDI partner Chapin Hall's Family Self-Sufficiency Data Center (FSSDC). This assessment highlighted the status of current state data analytic capacity and practice in 2014. The TDI team has used this prior needs assessment to focus the TDI needs assessment survey questions on priority items and improve the validity of survey questions, while allowing opportunities for respondents to highlight new needs that have emerged since 2014. This survey was not a federal survey, so did not require OMB clearance.

The Office of the Assistant Secretary for Planning and Evaluation (ASPE) and ACF also funded a study called "A Scan of the Status of States' Integration of Human Services and Health Insurance Programs" to assess the extent of states' cross-program integration activities. This project administered a questionnaire to state human services commissioners in 2016 (collected under OMB #0990-0421). This questionnaire was primarily focused on data integration for eligibility determination and enrollment, not about capacity for analytics, performance measurement, or program improvement. As such, the current effort is not duplicative.

A5. Involvement of Small Organizations
No small organizations are affected by the information collection.

A6. Consequences of Less Frequent Data Collection
This is a onetime 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 this information collection activity. This notice was published on June 29, 2018, Volume 83, Number 126, page 30735-30736 and provided a 60-day period for public comment. A copy of this notice is included as Appendix A. During the notice and comment period, ACF received one request for the proposed data collection instrument. The draft instrument was provided. The government did not receive any substantive comments in response to the Federal Register notice.

Consultation with Experts Outside of the Study
We do not currently anticipate engaging any outside experts beyond the stakeholder interviews (phase 2 of data collection – approved via OPRE’s formative generic clearance (0970-0356)).

A9. Incentives for Respondents
No incentives 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. The Contractor shall ensure that all of its employees, subcontractors, and employees of each subcontractor, who perform work under this contract, are trained on data privacy issues.

Information will not be maintained in a paper or electronic system from which they are actually or directly retrieved by an individuals’ personal identifier.

The needs assessment survey and the survey communication materials were reviewed and received IRB approval on July 24, 2018.

A11. Sensitive Questions
There are no sensitive questions in this data collection.

A12. Estimation of Information Collection Burden

Total Burden Requested Under this Information Collection

We anticipate having 216 individuals respond to various modules of the needs assessment survey (4 individuals per state * 54 states and territories). We anticipate that on average, each individual will complete two modules, and that each module will take 0.25 hours to complete. We anticipate a total of 108 burden hours for this effort as shown below.

Table A.1 Burden Estimates

Instrument	Total/Annual Number of Respondents	Number of Responses Per	Average Burden Hours Per	Annual Burden Hours	Average Hourly Wage	Total Annual Cost

		Respondent	Response			
Needs Assessment Survey	216	2	0.25	108	$34.07	$3,679.56
Total				**108**		**$3,679.56**

Total Annual Cost

Estimates for these respondents are based on the Department of Labor (DOL) May 2016 estimates for the mean hourly wage of Social and Community Service Managers: $34.07 http://www.bls.gov/oes/current/oes119151.htm

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 $354,000. The estimate includes the costs of project staff time to complete activities described in A2 (phase 3). The work is expected to be completed within one year so the annual costs to the Federal government will also be $354,000 for the proposed data collection under this OMB clearance number (0970-XXXX). See Table A.2 for a breakdown of costs by subtask and organization.

Table A.2 Estimate of Cost by Subtask and Organization

Subtask	Chapin Hall Amount	Chapin Hall Detail	MDRC Amount	MDRC Detail
Survey Design, Instrument Development, Pilot and User Testing	$115,000	Over a one year period, includes approximately: • 4% FTE for PI, • 30% combined FTE for researchers overseeing project, • 20% combined FTE for analysts, and • 4% FTE for project coordination	$12,000	Over a one year period, includes approximately: • 1% FTE for PI, • 5% combined for researchers and coordination.
Survey administration	$160,000	Over a three month period, includes approximately: • 10% FTE for PI, • 35% FTE each for two researchers overseeing project, • 50% FTE each for two analysts fielding survey and data cleaning, and • 30% FTE monitoring survey completion and respondent follow-up	$12,000	Over a three month period, includes approximately: • 1% FTE for PI, • 5% combined for researchers and coordination.
Analysis and initial dissemination	$42,000	Over a three month period, includes approximately: • 12% FTE for PI, • 40% combined FTE for researchers overseeing project, and • 20% FTE for analyst support analysis.	$12,000	Over a one year period, includes approximately: • 1% FTE for PI, • 5% combined for researchers and coordination.
Total	$317,000		$37,000	
GRAND TOTAL				**$354,000**

A15. Change in Burden
This is a new data collection.

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

Analysis Plan
The team will use a combination of qualitative and quantitative research methods to analyze the data we are proposing to collect.

The qualitative analysis will focus on identifying themes, challenges, and opportunities across states. This analysis will synthesize findings from stakeholder interviews and free text responses from the online survey.

The quantitative analysis is intended to identify clusters of states that share similar strengths and challenges in the use of TANF data. This analysis will categorize states' readiness to effectively use data as well as identify gaps in states' capacity to work with data and the types of technical assistance that may benefit them. The study team will use a number of different models to see what groupings naturally emerge from the data. The analyses will use numeric and binary responses from the background data collection and online survey tool as variables to characterize each state. There are several dimension reduction methods that may be appropriate, such as factor analysis, latent class analysis, k-means, and decision trees.

Time Schedule and Publication
Dates included in Table A.2 are based on OMB approval of this information collection request. The timeline will be adjusted, if necessary.

Table A.2 Data Collection and Publication Timeline

Data Collection Timeline		
	Start Date	**End Date**
Review of government and related websites and published literature	May 2018	September 2019
1st round of stakeholder interviews (collected under OPRE's formative generic (0970-0356)	August 2018	August 2019
Needs Assessment Survey (Attachment 1)	February 2019 or earlier, pending OMB approval	~ 8 weeks from start date
2nd round of stakeholder interviews (collected under OPRE's formative generic (0970-0356)	January 2020	March 2020

TANF Data Innovation (TDI) Payment Integrity Case Studies (to be submitted under OPRE's formative generic (0970-0356)	November 2019	March 2020
Data Analysis Timeline		
Data analysis for 1st round of stakeholder interviews	October 2018	October 2019
Data analysis for needs assessment survey	May 2019	July 2019
Data analysis for 2nd round of stakeholder interviews	March 2020	April 2020
Data analysis for payment integrity structured interviews	November 2019	March 2020
Publications Timeline		
Report on results of needs assessment survey	August 2019	February 2020

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.