

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

TANF and Child Support Moving Forward: Lessons Learned from the COVID-19 Pandemic

**Formative Data Collections for Program Support
0970-0531**

Supporting Statement

Part A

September 2022

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Part A

Executive Summary

- **Type of Request:** This information collection request is for a generic information collection under the umbrella generic, Formative Data Collections for Program Support (0970-0531).
- **Description of Request:** This request is for formative data collection activities to obtain information about how Temporary Assistance for Needy Families (TANF) and child support agencies adapted program processes and operations in response to the COVID-19 pandemic and how those adaptations affected program participants.

Data collection will include (1) a web-based questionnaire administered to a sample of state TANF and child support directors, (2) semi-structured interviews with state-level TANF and child support program administrators in the same TANF and child support state agencies that received the web-based questionnaire, and with a subset of TANF and child support local office staff, and (3) semi-structured group interviews with TANF and child support participants.

The data collected in the study are not intended to be generalized to a broader universe. We do not intend for this information to be used as the principal basis for public policy decisions.

- **Time Sensitivities:** ACF aims to start data collection as soon as possible. It is critical that this information be collected in the short-term in order to best capture how TANF and child support agencies have sustained and built upon the innovation spurred by the pandemic to improve program operations and service delivery. As the pandemic continues to evolve and TANF and child support agencies continue to look for ways to improve their program operations and service delivery, timely information that can be shared with all TANF and child support agencies about modifications adopted and sustained will help inform operational and service delivery considerations and changes.

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A1. Necessity for Collection

The COVID-19 pandemic and accompanying economic shocks created unprecedented disruption and challenges for human services programs and the families they serve. The pandemic increased demand for assistance and services for Temporary Assistance for Needy Families (TANF) and child support services at the same time that shutdown orders and social distancing upended program operations and service delivery. TANF and child support agencies had to make significant changes in their operations to continue to address the needs of the families they serve in this new and challenging environment. At the same time, the pandemic sparked a unique opportunity for programs to innovate and propelled the adoption of new policies, processes and practices, including shifting modes of service delivery, developing new partnerships, and using new and existing policy flexibilities to facilitate program adaptations.

While some studies have focused primarily on some of the early operational changes and policy choices that TANF and child support agencies made in response to the COVID-19 pandemic, they have not examined the extent to which these changes have been incorporated into ongoing practice. The Office of Planning, Research, and Evaluation (OPRE) within the Administration for Children and Families (ACF) is conducting this formative information collection to advance knowledge about the types of changes and adaptations that TANF and child support agencies have continued on a sustained basis, and what that has meant for program operations, service delivery, and the participants they serve. ACF has contracted with Mathematica and its subcontractor, MEF associates, to conduct this study.

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

A2. Purpose

Purpose and Use

The purpose of this study is to document how TANF and child support agencies responded to pandemic-related challenges, the lessons learned from their experiences, and the extent to which these programs have sustained adaptations and intend to continue them in the long-term. ACF will use the information to inform future program operations in the TANF and child support programs as well as inform related future directions for research. The information collected will 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.

The information obtained through this data collection will provide timely information to TANF and child support programs about changes and adaptations that they and other TANF and child support programs are making to improve their operations and services, and better support the well-being of families. It will assist in ACF's technical assistance planning efforts by identifying policy and programmatic modifications where additional technical assistance could be beneficial. It will also inform ACF's future research agenda more broadly, offering

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considerations for supporting the well-being of families particularly vulnerable to short and long-term economic effects of the pandemic.

Findings from this study will be incorporated into reports that will be shared publicly in an effort to provide timely information to TANF and child support programs about changes and adaptations that they and other TANF and child support programs are making to improve their operations and services, and better support the well-being of families. They will also be incorporated into other training or technical assistance (T/TA) resources that will be made public.

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

- The development or refinement of program processes.
- Planning for provision of programmatic or evaluation - T/TA.
- Development of research priorities.

Guiding Questions

Four broad questions will guide this study:

1. How did TANF and child support programs change during the COVID-19 pandemic? What temporary state and federal policy flexibilities did these programs use?
2. What successes and challenges did TANF and child support programs encounter and what lessons were learned when implementing these changes?
3. What changes did TANF and child support programs make during the COVID-19 pandemic that have been continued or will likely be continued?
4. What has been the experience of TANF and child support program participants with the COVID-19 pandemic-related changes?

Study Design

Table 1 provides an overview of the study design and data collection activities that are planned to address the research questions. The study design includes collecting information from 20 state TANF and 20 state child support agencies about adaptations made to program policies, operations, processes, and activities in response to the COVID-19 pandemic. The selection of states for inclusion in the study to focus on TANF or child support programmatic responses has not yet been finalized; the states ultimately included in the TANF and child support study samples may differ in some cases and overlap in others. TANF and child support programs will be purposively identified and selected for inclusion in the study based on a number of factors. The programs will represent a range of geography, program structure, COVID-19 impact, caseload size (the number of TANF and child support cases in a state), policies, administrative structures, and processes. More details about site selection are available in Supporting Statement B, section B2.

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Data will be collected using three different instruments:

1. **Web-based questionnaire** for state TANF and child support program directors
 - o Instrument 1a: State TANF agency web-based questionnaire
 - o Instrument 1b: State child support agency web-based questionnaire
2. **Semi-structured tele- or video-conference staff interview guide** for state- and local-level TANF and child support staff
 - o Instrument 2a: State TANF and child support staff interview
 - o Instrument 2b: Local TANF and child support staff interview guide in a subset of states
3. **Semi-structured tele- or video-conference participant interview** guide for small groups of TANF and child support program participants in a subset of states
 - o Instrument 3a: TANF participant interview guide
 - o Instrument 3b: Child support participant interview guide

These data collection instruments will be administered separately for each program (for example, semi-structured interviews will be conducted with TANF staff separate from semi-structured interviews with child support staff).

Data collected through the web-based questionnaire will be used to systematically document adaptations made by state TANF and child support programs during the pandemic. The questionnaire will take, on average, 20 minutes to complete and consist primarily of close-ended questions. The questionnaire will be the first data collection activity so that the team can use the information collected to inform follow-up, semi-structured discussions with state-level and local-level respondents.

The semi-structured state-level interviews with TANF and child support administrative staff will provide the opportunity to learn more about the changes identified through their completion of the web-based questionnaire and facilitate a more focused discussion about the decision-making process around pandemic-related adaptations, how these changes affected program processes and operations, and reasons for choosing to sustain certain changes. Semi-structured interviews with state-level respondents will take approximately 60 minutes. Program operations and service delivery vary across local offices in both TANF and child support programs. To capture local-level perspectives and variation in pandemic-related changes within states additional interviews with local-level staff will be conducted. Potential staff to include in local interviews will include county directors, operations managers, other managers, frontline staff, and contracted service providers where appropriate. Interviews with local-level staff will focus on sustained changes that were most impactful at the local level. Semi-structured interviews with local-level respondents will take approximately 60 minutes.

Small group interviews with TANF and child support program participants will provide insights into participant needs and interactions with the TANF or child support program during the pandemic and their perceptions of various pandemic-related changes in program policies and operations. These interviews will take approximately 60 minutes.

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Details about respondent selection are available in Supporting Statement B, section B2.

The study is intended to be descriptive in nature, and the limitations of the study methodology will be clearly stated in all published material.

Table 1. Information Collection Procedures and Processes

Data Collection Activity/Instrument	Respondents	Content and Reason for Collection	Duration and Mode
Instrument 1a State TANF agency web-based questionnaire Instrument 1b State child support agency web-based questionnaire	State-level TANF agency and child support agency program administrators. Program administrators include agency directors, policy staff, and operations staff.	Content: The web-based questionnaire will obtain information about: • adaptations that TANF and child support programs made during the pandemic, • which adaptations they view as most helpful in supporting ability to serve participants • changes that have and will continue to be sustained Purpose: To systematically document state TANF and child support agency responses to the pandemic and changes that have been sustained	Duration: 20 minutes Mode: e-mail link to online survey software questionnaire
Instrument 2a State TANF and child support staff interview guide Instrument 2b Local TANF and child support staff interview guide	State-level TANF and child support program administrators, including a mix of: • TANF and child support agency directors, policy staff, and operations managers. Local or county office-level TANF and child support program staff, including a mix of: • Local agency directors, operations managers, other managers, senior front line staff, and contracted TANF and child support service providers.	Content: • Decision-making process for pandemic-related adaptations • Reasons for sustaining pandemic-related adaptations • Staff experiences and perspectives about how pandemic-related changes impacted program operations and outcomes Purpose: To document state and local level TANF and child support staff perceptions about agency responses to the pandemic, changes that have been sustained, and implications for program operations and participants.	Duration: 60 minutes Mode: Tele- or video-conference
Instrument 3a TANF participant interview guide Instrument 3b Child	TANF and child support program participants. Program staff identify current TANF and child support program	Content: These interviews will obtain information about: • needs and challenges	Duration: 60 minutes Mode: Tele- or video conference

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Data Collection Activity/Instrument	Respondents	Content and Reason for Collection	Duration and Mode
support participant interview guide	participants	during the pandemic, • program experiences during the pandemic • how programs addressed their needs and perspectives on changes that have been or should be sustained Purpose: To document participant perspectives on their experiences with TANF and child support program during the pandemic and beyond	

Other Data Sources and Uses of Information

Publicly available documents, such as federal TANF and child support policy guidance and state TANF and child support policy updates related to the pandemic will be drawn upon to provide background context for understanding the types of changes that state TANF and child support programs considered and made in response to the pandemic and continued in its aftermath.

A3. Use of Information Technology to Reduce Burden

A web-based questionnaire will be administered to state TANF program directors and state child support directors to collect primarily close-ended information about pandemic-related adaptations that were made by TANF and child support programs. The web-based questionnaire will be administered using QuestionPro, a user-friendly on-line survey software platform. Respondents will receive a unique web questionnaire link that will take them directly to their survey instrument. It is anticipated that all questionnaires will be completed electronically by web. However, in the event a respondent wishes not to complete the questionnaire on-line, a fillable pdf version of the survey will also be provided.

The information collected through semi-structured discussions via tele-or video-conference with staff and participants is not conducive to information technology allowing the electronic submission of responses. The semi-structured interviews with state and local TANF and child support staff will be audio-recorded, with the permission of the respondent, in order to assist with written note-taking. In addition, information collected through the web-based questionnaire will be used to help guide semi-structured staff interviews so that discussions focus on areas of sustained change identified through the questionnaire, thereby allowing for a shorter interview duration.

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

The study has made every effort to avoid duplication and minimize burden. To inform the study design and ensure that it did not duplicate existing research, two literature scans—one focused

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on TANF and the other focused on child support—were conducted to learn about the types of policy and operational changes that TANF and child support agencies were making since the beginning of the pandemic. While some relevant studies were identified that helped inform the study design¹, there is a distinct gap in information about whether and how changes have been incorporated into ongoing practice and participant perceptions about these changes. This project will fill this gap by building on but not duplicating earlier studies and providing this information in a format that is not comparable elsewhere.

A5. Involvement of Small Organizations

No small businesses will be impacted by this information collection.

A6. Consequences of Less Frequent Data Collection

This is a one-time data collection.

A7. Now subsumed under 2(b) 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 from OMB to extend approval of the overarching generic clearance for formative information collection. This notice was published on January 28, 2022 (87 FR 4603) and provided a sixty-day period related to an extension request to this umbrella clearance. A subsequent notice was published on July 13, 2022 (87 FR 41723) and provided a thirty-day period for public comment. During the notice and comment periods, no comments were received.

Consultation with Experts

Consultations were held with the following TANF and child support external experts to inform the study design and development of the data collections instruments included in this request:

- Michele Cristello, National Council of Child Support Directors, President
- James Fleming, National Child Support Enforcement Association, President
- Tommy Howard, Eastern Regional Interstate Child Support Association, President
- Elizabeth Lower-Basch, Center for Law and Social Policy, Income and Work Supports, Director
- Mary Nelson, American Public Human Services Association, Employment and Economic Well-Being, Policy Associate
- Donna Pavetti, Center on Budget and Policy Priorities, Family Income Support Policy, Vice-President

¹ National Council of Child Support Directors (NCCSD). "Impact of the Covid-19 Pandemic on Delivery of Child Support Services." July 23, 2020; Shantz, K., H. Hahn, M. Nelson, M. Lyons, and A. Flagg. "Changes in State TANF Policies in Response to the COVID-19 Pandemic." Washington, DC: Urban Institute, 2020.

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- Veronica Riley, Western Intergovernmental Child Support Enforcement Council, President
- Babette Roberts, National Association of State TANF Administrators, Chair

A9. Tokens of Appreciation

Data collected through small group interviews with TANF and child support program participants are not intended to be representative in a statistical sense and they will not be used to make statements about the prevalence of experiences with pandemic-related changes in the TANF and child support programs. However, it is important to speak with TANF and child support participants to learn first-hand about the types of needs and challenges they faced during the pandemic, their program experiences during this time, and what types of changes they would like to see sustained or expanded going forward.

The small group program participant interviews will take place virtually or by telephone, though interviewers will be flexible to the needs of program participants. To offset costs of participation in the 60-minute interviews, program participants will be offered a \$30 gift card. Without offsetting the direct costs incurred by respondents for attending interviews, such as arranging child care or taking time off work, it is possible that only those individuals able to overcome the financial barriers will participate in the study, potentially affecting the quality of the resulting data and insights. Upon completion of the interview, electronic gift cards will be emailed to respondents with access to email. The token of appreciation of gift cards will be mailed to those without access to email or any respondent who expresses a preference for receiving a physical gift card.

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

Personally Identifiable Information

Program staff and participants' names, telephone numbers, and/or e-mail addresses will be collected for use during study recruitment and scheduling purposes. This personally identifiable information (PII) will not be linked to individual responses and will be destroyed after completion of data collection. Information will not be maintained in a paper or electronic system from which it is actually or directly retrieved by an individual's personal identifier.

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, that their participation is voluntary, and that their information will be kept private to the extent permitted by law. As stated in the data collection instruments, all interview respondents will be notified at the beginning of each interview that the information that they provide will never be linked to their names, that their names will never be shared in interview transcripts or any study report, and that their participation is voluntary (see Instruments 1, 2, and 3). Interview notes will not be shared by the study team with ACF or anyone outside of the study team, except as otherwise required by law. All study team interviewers, including staff from Mathematica and MEF, have received training in privacy procedures.

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Data Security and Monitoring

Mathematica, the primary contractor, has developed a data safety and monitoring plan for ACF that assesses all protections of respondents' PII. It ensures that the study team members from Mathematica and MEF who perform work under this contract are trained on data privacy issues and procedures and comply with the above requirements. All study team members 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. All study team interviewers have already received training in data security procedures.

Data collected will be stored in a restricted folder on the servers of the primary contractor. Mathematica's servers are located behind Mathematica's firewall and housed in a locked data center located in Mathematica's locked access-controlled office suite. The data is mirrored in a secure, fault-tolerant data center; only authorized Mathematica Information Technology Services staff have physical and or logical access to the data mirror. Sensitive data resides on a project-specific folder that is only accessible to Mathematica staff who have a business need-to-know, as restricted by identity-based policies and access control lists. The data is encrypted as it is stored on the server with an Advanced Encryption Standard (AES) 256-bit key, which is FIPS 140-2 compliant. The folder in which the data resides is backed up onto encrypted disks. These backups are overwritten every two months by backups of newer secure data, a process that enables compliance with secure data destruction requirements.

Data collected by MEF study team members will be stored on cloud-based tools purchased through Microsoft Office 365 Business for storage of digital project materials. Office 365 Business meets FISMA requirements and has the FedRAMP Agency Authority to Operate (ATO) at the moderate level. Any paper information will be stored in locked cabinets and will be shredded once scanned.

To share data between Mathematica and MEF study team members, the team will use Box.com. MEF's data security guidelines include using encrypted laptops for writing up any notes; using secure storage locations; using secure transfer mechanisms; limiting access to only those who need to know; and destroying data once analysis is complete.

A11. Sensitive Information

The study does not require asking TANF and child support program staff sensitive questions to understand pandemic-related changes made to TANF and child support programs.

To understand program participant experiences, some participants from the TANF and child support programs will be asked to describe their experiences with these programs. Although these discussions will focus on how participants experienced changes to the TANF and child support program during the pandemic, the discussion of their experiences may raise sensitive topics. These sensitive topics include how employment and income were affected by COVID-19 and economic hardship experiences as a result of COVID-19. Before starting, all respondents will be informed that their identities will be kept private, that their participation is voluntary, that their responses will not affect any services or benefits they or their family members receive, and that they do not have to answer any questions that make them uncomfortable.

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The study has submitted a request for approval from an Institutional Review Board for this information collection.

A12. Burden

Explanation of Burden Estimates

The total annual burden requested is 86.4 hours (Table 2). This includes burden associated with data collection from about 246 unique respondents. A total of up to 20 TANF respondents and 20 child support respondents will complete the web-based questionnaire for approximately 20 minutes (Instruments 1a and 1b). These same 20 TANF and 20 child support respondents will participate in a semi-structured virtual or telephone interview for approximately 60 minutes (Instrument 2a). Up to an additional 40 TANF program staff and 40 child support program staff, including policy staff and operations managers will be interviewed virtually or by telephone for approximately 60 minutes (Instrument 2a). Up to 48 local level TANF program staff and 48 child support program staff such as local agency directors, operations managers, senior front line staff, and contracted service providers will be interviewed virtually or by telephone for approximately 60 minutes (instrument 2b). Up to 15 TANF program participants and 15 child support program participants will be interviewed virtually or by telephone for approximately 60 minutes (Instruments 3a and 3b).

Estimated Annualized Cost to Respondents

The annualized cost burden to respondents is based on the estimated burden hours and the assumed hourly wage rate for respondents. The total annual respondent cost is \$3,617.25 (Table 2). To compute the total estimated annual cost, the total burden hours were multiplied by the estimated average hourly wage for program staff and participants. According to the Bureau of Labor Statistics' Operational Employment and Wage Statistics, the median hourly wage for state government full-time general and operations managers is \$49.57 (NAICS 999200, 11-1021²). The median hourly wage for local government full-time general and operations managers is \$48.19 (NAICS 999300, 11-1021³). The median hourly wage for local government full-time miscellaneous community and social service specialist is \$23.68 (NAICS 999300, 21-1090⁴). We anticipate that the local staff who will be interviewed for this study will be roughly three-quarters general and operations managers and one quarter miscellaneous community and social service specialists for a median hourly wage of \$42.00. The hourly wage (\$7.25) for participants and potential study participants is the federal minimum wage.

² https://www.bls.gov/oes/current/naics4_999200.htm

³ https://www.bls.gov/oes/current/naics4_999300.htm

⁴ https://www.bls.gov/oes/current/naics4_999300.htm

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Table 2. Annual burden hours requested under this information collection

Instrument	No. of Respondents (total over request period)	No. of Responses per Respondent (total over request period)	Avg. Burden per Response (in hours)	Total Burden (in hours)	Annual Burden (in hours)	Average Hourly Wage Rate	Total Annual Cost
Instrument 1a. TANF Web-based Questionnaire (TANF and child support Director and operations manager burden)	20	1	.33	6.6	2.2	\$49.57	\$109.05
Instrument 1b. Child Support Web-based Questionnaire (TANF and child support Director and operations manager burden)	20	1	.33	6.6	2.2	\$49.57	\$109.05
Instrument 2a. State TANF and child support staff interview guide (state TANF and child support directors and operations manager burden)	120	1	1	120	40	\$49.57	\$1,982.80
Instrument 2b. Local TANF and child support staff interview guide (local TANF and child support directors and operation manager and frontline worker burden)	96	1	1	96	32	\$42.00	\$1,343.84
Instrument 3a. TANF participant interview protocol (TANF participant burden)	15	1	1	15	5	\$7.25	\$36.25
Instrument 3b. Child support participant interview protocol (Child support participant burden)	15	1	1	15	5	\$7.25	\$36.25
Total					86.4		\$3,617.25

A13. Costs

There are no direct costs to respondents.

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A14. Estimate of Annualized Costs to the Federal Government

We estimate the annual costs to the Federal Government will be \$112,300 (Table 3). This includes direct and indirect costs of the information collection.

Table 3. Estimated Annualized Costs to the Federal Government

Cost Category	Estimated Costs
Field Work	\$179,681.32
Analysis	\$113,431.48
Publications/Dissemination	\$43,924.93
Total costs over the request period	\$337,037.73
Annual costs	\$112,345.92

A15. Reasons for change in Burden

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

A16. Timeline

Data collection

SCHEDULE

Task	Completion date
Data collection	8 months after OMB approval
Data analysis	15 months after OMB approval
Dissemination of findings	20 months after OMB approval

A17. Exceptions

No exceptions are necessary for this information collection.

Attachments

Instruments

Instrument 1a Questionnaire about Pandemic-Related Changes to the TANF Program

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Instrument 1b Questionnaire about Pandemic-Related Changes to the Child Support Program
Instrument 2a State TANF and child support staff interview guide
Instrument 2b Local TANF and child support staff interview guide
Instrument 3a TANF participant interview guide
Instrument 3b Child support participant interview guide

Appendices

Appendix A Example letter of support from Office of Family Assistance/Office of Child Support Enforcement
Appendix B Example letter of support from American Public Human Services Association/
National Council of Child Support Directors
Appendix C Recruitment email from study team
Appendix D Moving Forward project description
Appendix E State TANF/Child Support Director scheduling email
Appendix F Local TANF/Child Support staff invitation email
Appendix G Program participant recruitment email
Appendix H Program participant meeting invitation