

Approaches and Methods for Assessing and Remedying Barriers, Burden, and Inequities in Public Service Delivery and Access

By Rekha Balu

A version of this statement was submitted by MDRC on July 6, 2021, in response to the Office of Management and Budget's request for information about Methods and Leading Practices for Advancing Equity and Support for Underserved Communities Through Government. It was written by Rekha Balu, Director of the MDRC Center for Applied Behavioral Science, on behalf of MDRC project teams and the MDRC Equity Collaborative.

DRC is a nonprofit, nonpartisan research organization whose mission is to build knowledge that improves the lives of people with low incomes. We bring more than four decades of experience collaborating with communities, local and state governments, federal grantees, and federal agencies to support their improvement strategies, design program innovations, and test those using rigorous and reliable research methods. We have led some of the most complex and important studies of economic mobility programs-including CUNY's Accelerated Study in Associate Programs (ASAP), Jobs-Plus, and Career Academies—and our staff have worked in virtually every state and major city in the country, plus with hundreds of nonprofit subcontractors and providers who deliver government services.

We represent a diverse set of experiences working with different levels of government (from federal to local), research methods (from randomized trials to formative assessments), methodologies of community engagement (from participatory action research to

co-design of interventions to co-facilitation of conferences), expertise with different human services domains (from disconnected youth to criminal justice to families experiencing homelessness), and development and provision of technical assistance tools and forums.

MDRC recognizes the power dynamics present between programs and participants. We have seen that research, evaluation, technical assistance, and program improvement efforts can extract time and energy from participants, which can potentially amplify inequities rather than alleviate them. MDRC invests in culturally competent research approaches and applies an equity lens to the shape and arc of our work via the Equity Collaborative, an internal hub that promotes cross-project learning and support.

In the design phase, we consider potential biases, sociocultural context, and broader motivations for the work. We have staff who are trained in equity-informed and culturally responsive research methods,¹ including





¹ This document uses the definition of equity listed in the Office of Management and Budget's request for information. We draw on definitions of culturally responsive research methods from many sources, including Stafford Hood, Rodney Hopson, and Karen Kirkhart, "Culturally Responsive Evaluation: Theory, Practice, and Future Implications," pages 281-317 in Kathryn Newcomer, Harry Hatry, & Joseph Wholey (eds.), Handbook of Practical Program Evaluation, 4th Edition (Hoboken, NJ: Wiley, 2015); and Public (continued)

ways to incorporate participants' voices to diagnose problems and strengthen programs, techniques for facilitating conversation between parties with different views, and Participatory Action Research approaches to develop interview, analysis, and dissemination strategies with program participants. We assess how project teams expect to gather community input; how they will incorporate participant experiences and expertise in program and research design and measurement strategies; and how findings will be disseminated to authentically engage stakeholders.

Through recent partnerships that bridge government and private funding, and/or that deliver services via government, nonprofit, and private channels, we have developed a collaborative learning approach to diagnose administrative burdens, design potential solutions, and test those solutions in rigorous evaluations. For instance, we have crafted these public-private funding partnerships in the past several years:

- MyGoals, an employment coaching intervention for people living in public housing, works in partnership with public housing authorities in Baltimore and Houston and is funded primarily by Arnold Ventures;
- The Men of Color College Achievement project, funded by the federal Institute of Education Sciences and the William T. Grant Foundation to support and evaluate a culturally responsive intervention; and
- Paycheck Plus, which was funded by the Department of Health and Human Services (HHS) and the Department of Labor, as well as the Ford

Foundation, Arnold Ventures, the Annie E. Casey Foundation, and NYC Opportunity for the New York City site that worked with local nonprofit service providers to supplement the Earned Income Tax Credit for low-wage workers without dependent children.

Responses to Questions in Area 2: Barrier and Burden Reduction

To implement optimal strategies for reducing overall burden, it will be critical for federal agencies to identify the full range of burdens that participants, staff, and administrators experience. This means in some cases stepping back from existing assumptions or data and assessing and describing the full set of burdens facing different populations, not just those burdens that are known in select datasets or that have been discussed for select populations (Qs 2a, 2c, 2f, 2h, and 2i).² For example, although barriers to renewal or recertification may be better documented because they rely on data for an existing defined group of recipients, reducing barriers to learning about and applying for programs could benefit more people by increasing the number of people who correctly apply for a service.

To understand the full range of burdens, MDRC takes a multi-layered approach, in partnership with communities and state, local, and nonprofit grantees of federal programs and sometimes with state and federal agencies themselves (as with community colleges, the Department of Housing and Urban Development, or HHS/Office of Family Assistance). Some or all these steps may already be used by federal agencies to understand customer experience or to conduct evaluation.

Policy Associates, Inc., Considerations for Conducting Evaluation Using a Culturally Responsive and Racial Equity Lens (Lansing, MI: Public Policy Associates, Inc., 2015).

² The parenthetical references denote which sub-questions in the OMB request for information that our responses are answering.

To build understanding of the psychological costs, start by describing the context and design of a program or policy (Qs 2a and 2d).

Given that limited resources and insufficient time can impair decision-making, the policy and practice conversation about how to support people living in poverty involves changing the way government works, not just changing how people interact with government to cope with burdens. We recommend starting with a conversation or assessment about whether a program sits within and advances an unfair system. It also starts with asking for whom the program was designed—for people with relatively strong understanding of a program and support systems, but insufficient time; or for people with overlapping and intersecting needs who may not benefit from a program or policy because they lack other supports in their lives? Psychological costs stem from perceived or real unfairness related to design choices.

For programs that offer real benefits and services, it is useful to start with something as basic as creating a list of any service alternatives in the private or nonprofit sector, if the government is not the sole service provider. If there is only one provider, the burden of access for clients may feel greater. In addition, it is important to consider the intention of the program design. Was the program created to expand access and coverage and invite more participants? If so, then eliminating small process hassles could reduce psychological costs. Or was the program created to reduce the number of people accessing benefits and the rate at which they access and use benefits? Processes and programs designed to discourage access impose greater psychological costs, so they may need to change their overall design, rather than just improve an application form, in order to reduce burden.

Burdens reflect and follow from the context, not just the program itself. Therefore, we explore how context relates to the nature of customer interaction with government: When are participants reacting to one-directional requests or mandates vs. acting of their own accord? Are people being asked to do things that will increase cognitive load or a negative sense of self? Repeated requests for redundant information and other aspects of the application process itself can convey mistrust in clients; repeated verification can negatively prime clients and create an adversarial relationship. There also are higher psychological costs to application for populations experiencing extreme uncertainty, such as those who are unstably housed or those in need of disaster assistance. For example, in our study of school application rates for kindergarten in New York City,3 we learned that some families without permanent housing postponed applying to school programs while in the midst of uncertainty. This was not procrastination but a seemingly rational choice to wait until they knew what activity would be relevant for their family given the time required to apply for those activities and the months-long wait between application and school assignment.

For federal agencies' forthcoming Equity Action Plans, we suggest the use of forward-looking equity tools, rather than audits that look back at past processes and are benchmarked to a specific standard (given that standards will evolve over time and may need to vary by program) (Qs 2e and 2i). Equity plans can prospectively assess factors that could contribute to inequitable:

- policies (e.g., public commitments and data-driven goals, asset vs. deficit-based language)
- practices (e.g., accessibility of communication and services)

³ See Rekha Balu, Barbara Condliffe, and Margaret Hennessy, *Kindergarten Outreach, Application, and Enrollment: Lessons Learned from a Research-Practice Partnership with New York City's Department of Education* (New York: MDRC, 2021).

- staffing and resources (e.g., hiring and retention of quality and representative staff), and/or
- community connections (e.g., partnerships and pathways to receiving institutions and organizations).⁴

To understand burdens facing participants and staff, quantify drop-off or attrition associated with implicit and explicit requirements and actions (Qs 2a, 2b, and 2d).

We typically begin with a map of the sequence of activities that potential participants and local agency staff follow, particularly occasions when participants must provide information and make decisions. Such tools as business process maps, customer journey maps, and service blueprints can illustrate when and whether participants are being asked to provide information multiple times or in formats that are cumbersome (printouts, faxes, etc.).⁵ The visual description paints a picture of burden:

- What does it take to prove eligibility?
- How many forms must be filled out?
- Can people apply online, share information by phone, or have to show up in person with printed forms?
- Are in-person time slots restricted or flexible?
- Are websites or offices offering supportive services or do messages and signs focus primarily on prohibitions?

- What additional documents and forms must be filled out after initial intake?
- Do the forms request information the customer has already provided or that are not strictly necessary to determine eligibility?
- How often do people need to re-do those forms?
- How much time elapses between submitting a form or application and waiting for a decision?

Corresponding to key steps in the process map, we collect data to understand progress or attrition. Points of large overall attrition or disproportionate attrition between populations and groups highlight steps or requirements that pose undue burden. Key data points include:

- Who is and is not in the agency's data to determine eligibility? Social service systems can route people into programs and services to do certain things. What behaviors are and are not captured in administrative data that may be associated with eligibility?
- Who and how many are eligible?
- Of those who are eligible, who and how many apply? Of those who are not eligible, who are they, how many, and where are they located? Why are they not applying? How many do not apply because of missing information or insufficient time?
- Of those who apply, how many express interest or intent to enroll? How many enroll? How

⁴ Paula N. Johnson, "Using Equity Audits to Assess and Address Opportunity Gaps Across Education," *IDRA Newsletter* 47, 4 (2020): 1-2,7-8; Singhashri Gazmuri, Skyline College's Diversity Framework: Equity Audit using Completion by Design Framework (San Bruno, CA: Skyline College, 2012); Linda Skrla, Kathryn Bell McKenzie, and James Joseph Scheurich, *Equitable Audits to Create Equitable and Excellent Schools* (Thousand Oaks, CA: Corwin Press, 2009; National Association of System Heads, Equity Action Framework (Adelphi, MD: Author, 2020); Kristine Andrews, Jenita Parekh, and Shantai Peckoo, A Guide to Incorporating a Racial and Ethnic Equity Perspective Throughout the Research Process (Washington, DC: Child Trends, 2019); Nayantara Sen and Terry Keleher, Creating Cultures and Practices for Racial Equity (New York: Race Forward, 2021).

⁵ MDRC uses these tools to inform the design of interventions and evaluations of programs known to have high participant burden, such as child welfare and TANF agencies, in the Behavioral Interventions to Advance Self-Sufficiency (BIAS) and BIAS-Next Generation projects (funded by HHS's Administration for Children and Families [ACF]); SNAP Employment and Training sites (funded by the U.S. Department of Agriculture); Strengthening Implementation of Responsible Fatherhood programs (funded by HHS/ACF); and the TANF Data Innovation project (funded by HHS/ACF). These build on existing federal resources and tools, such as human-centered design guides, discovery prompts from the Lab@OPM, journey maps from federal agencies' Customer Experience offices, and information about how offices interact with advisory panels or councils.

many of these are people who expressed interest and were eligible?

- Of those who enroll, how many attend?
- Of those who attend, how many complete the program or service? How many stop-out and need to re-apply or re-enroll?

While these questions can seem basic or obvious, they are not part of standard reporting, and currently many state and local agencies do not easily share this information with the public.

The path to reducing burden lies in part in creating a shared system in which federal administrators and state and local grantees, participant-facing staff, participants, and advocates are all seeing and using data like what is listed above to highlight progress or gaps. Transparency around customer progress can create shared demand for solutions to customer burden, disengagement, and attrition. Therefore, agencies may want to approach our detailed set of questions above by directly asking potential program participants, holding regular conversations with frontline staff who handle recruitment and enrollment, or holding focus groups with those who complete programs to figure out what made it possible for them to complete a program (Qs 5d and 5e). For example, when we have taken this approach to mapping in collaboration with community colleges, onsite staff have continued to use the maps and progress measures to track equity.6

Use indicators of inequity and analyses that capture different burdens and their consequences (Qs 2b, 2c, 2f, and 2h).

We recognize that different measures of inequity can show different burdens. Take the example of someone applying for and participating in a cash assistance program. Agencies may want to examine four types of measures, roughly in chronological order of a client's experience.⁷

• Input-related measures can cover access to services, opportunities, or funding. Measures may include distribution and availability of information between different populations and places, such as whether it is clear where, when, and how to apply for assistance, and how widely information is distributed. This phase also can include a communications review to assess whether information sent to potential participants includes relevant information, specifically the benefits of the program rather than merely the logistics of the program.⁸

We also look at application rates and enrollment rates and work with our partner agencies to define who is in the denominator of any rate (e.g., are applications and enrollments coming primarily from people with previous contact with the agency, new potential clients who may have more urgent needs, others?). When enrollment rates among a clearly eligible population are less than 60 percent, such as for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), it suggests that program application and enrollment processes pose more burden than benefit. Application denials also may suggest that programs are

⁶ See MDRC examples of maps from 2020, including, Mapping the College Transfer Process: Barriers to Student Success and Opportunities for Improvement, Process Maps: Many Voices Help Make Change, and Using Insights from Behavioral Science to Help College Students Stay Enrolled. For equity measures, see Looking Ahead Toward Equity: The College Promise Success Initiative.

⁷ See Denita Cepiku and Marco Mastrodascio, "Equity in Public Services: A Systematic Literature Review," Public Administration Review (2021).

⁸ We use the CABS Effective Communications Checklist (see <u>Getting Your Message Across with the Effective Communications Checklist</u>) in collaboration with local agencies to review to what extent outgoing letters, messages, and other outreach are clear, simple, and internally consistent.

providing incorrect information or incorrect targeting of information.

For example, Michigan had the nation's highest Temporary Assistance for Needy Families (TANF) application denial rates based on 2018 data: an average of just 15.4 percent of TANF applications were approved, according to the Center on Budget and Policy Priorities. As one of eight pilot states in the TANF Data Collaborative, the Michigan Department of Health and Human Services learned from Colorado, a peer pilot, that it too had a high denial rate. Many of the denied applicants in Colorado were not eligible for TANF because they did not have a child or a child on the way and/or were not living with a disability. Colorado had made a simple change to its flyer: changing an image on their application from a dollar sign (\$) to a family and adding an icon representing someone with a disability; its denial rate then declined. MDHHS made a similar change and is now tracking how it affects its TANF application denial rate.

Output-related measures include the use and distribution of services, opportunities, or funding —as well as program drop-off and churn. We interview clients of training, education, or social services to understand if they perceive the benefits to be worth the time required to participate. If they do not see them as valuable or easily available, then reducing administrative burden may not be enough to boost participation. In tandem, we often examine data about the nature of participation, such as for how many months are people using benefits and participating in transition services, and how that varies by populations—and then delve into whether shorter use indicates a quicker transition off of benefits or challenges with accessing and/or renewing their benefits (Qs 2b and 2c).

We also suggest that for programs that carry penalties or sanctions for noncompliance, agencies can examine sanction rates relative to enrollment rates for different groups, to identify if some populations are disproportionately sanctioned. For example, as part of the Supplemental Nutrition Assistance Program (SNAP) Employment and Training pilot funded by the U.S. Department of Agriculture, MDRC worked with agencies in Georgia and Illinois. Participants were required to complete a four-week job search or their benefits would be sanctioned. Yet for some participants, the cash benefit did not outweigh the time required for job search, and those clients accepted a sanction. During 2019-2020, these programs showed differences in the proportion of Black clients who are sanctioned vs. enrolled; differences by state may be related to program requirements, commuting distances, and availability of other supports.

During focus groups, some SNAP Works 2.0 enrollees in Georgia explained their reasons for disengaging from services. These included a general sense that the services and supports provided by the state Department of Labor were not as robust as what had been promised, with one individual remarking that they felt "misled to fill seats." Others remarked that the policy on sanctioning did not take into account the challenges that able-bodied adults without dependents faced in their day-today lives, and that sanctions were triggered too quickly and were "too severe." Another frustration cited by some individuals enrolled in SNAP Works 2.0 was the length of time required to commute to Georgia's career center locations. In Illinois, some individuals could not afford to go without a paycheck for the duration of occupational skills training (and potentially other required activities); instead they would seek employment, and once they started a job, they stopped attending employment and training services. To minimize attrition related to cash flow, some service providers offered paid work experience. If an individual started working (full time or part time), they were more likely to have trouble completing the activities. One of these individuals said, "Every day I think to myself, 'Can I stick it out until [the end of training]?' It is difficult. All I am doing is creating debt."

Process and outcome-related measures include implementation of services and attainment of outcomes targeted by services, opportunities, or funding. These can include measures of performance, such as how many people did the program serve and whether they studied or worked more hours, completed more courses or steps in a program, or advanced to a stage of the program where they could receive different levels of support (e.g., holding a job with fewer hours of coaching). In addition, we can measure whether the availability of resources is even across groups and places and to what extent programs offered or being evaluated are designed to address levels of concentrations of poverty or limited resources. We also can ask if the measures of demographics or identifying characteristics align with community definitions and values.

The extent of burden and inequity observed may depend on the unit of analysis—for example, there may be more inequity observed at the individual level (between a student who is Black vs. White) or at the institution level (school district or nonprofit, some of which may or may not serve exclusively students with historical disadvantage) than at the area level (community that may or may not include only those with historical disadvantage).

 Impact: These measures and analyses aim to quantify whether aspects of or changes to a program have eliminated or reduced differences in outcomes that were malleable and remediable.
For example, a common measure and analysis is whether an instructional intervention closed a difference in test scores between Black and White students (sometimes called "achievement gaps"). Although measuring gaps is an important part of understanding inequity, we note that measuring and reporting the gaps can implicitly or explicitly put the responsibility for performance on individuals themselves, while ignoring systemic or institutional factors that contribute to inequitable performance outcomes. For instance, disproportionate designations of students of color in special education and disciplinary or judicial actions against men of color reflect the decisions of staff and administrators, not just the participant whose outcome is measured. Therefore, to measure progress toward closing gaps, analyses should include staff and administrator measures as well.9

In addition to analyzing impact on average levels of performance, it is useful to examine comparative growth measures, rank ordering of participants, and/or indices that show the ratio of people at the top and bottom of an income distribution or between places that started with more and fewer investments.¹⁰

Historical: Descriptive analyses can show the distribution of access to resources, use of resources, and the outcomes from using resources within a program or place. Differences among groups of people, places, and programs can suggest room to investigate whether there are different structural or process barriers or that people experience different burdens from the same barriers. Sometimes this may take the form of longitudinal graphs; in other cases, it may involve calculating indices of inequality from summary data or formal regression analyses.

⁹ For links to additional measures, see Rachel Rosen and Rashida Welbeck, <u>Equity Metrics, Measures, and Analytic Approaches in Education Research</u> (New York: MDRC, 2021).

¹⁰ UNESCO, *Handbook on Measuring Equity in Education* (Montreal: UNESCO Institute for Statistics, 2018); National Academies of Sciences, Engineering, and Medicine, *Monitoring Educational Equity*. (Washington, DC: The National Academies Press, 2019).

- Current: Evaluation of existing programs can identify variation in program effects as a potential indicator of inequity. This analysis could be implemented in the context of nonexperimental or experimental research designs.
- Prospective: Simulating policy design choices and their effects on different people can illustrate to what extent particular groups bear different burdens and how policy or program design changes could alleviate those.

Test interventions that reduce burdens by changing systems, rather than tweaking information-seeking in ways that still burden individuals or families (Qs 2a, c, d, g, h).

Sometimes burdens result from low awareness of available opportunities rather than the intentional imposition of barriers. For example, an MDRC collaboration with 10 community colleges in Ohio found that students as well as financial aid advisors were not uniformly aware that students could use their Pell grant funding to cover summer enrollment in community colleges. We worked with college financial aid offices to design a calculator that allowed them to look up available aid for each Pell Grant-receiving student and to send students a customized letter with their specific remaining aid amount and an encouragement to enroll in the summer to complete more credits. The encouragement letter and email alone resulted in a 5 percentage point increase in summer enrollment and a significant increase in credits earned; the communications paired with a last-dollar tuition scholarship for any gap in fees not covered by the remaining Pell grant resulted in a 12 percentage point increase in summer enrollment and significant increase in credits earned. This intervention is an example of changing a system to be oriented toward credit accumulation, using financial aid resources efficiently, and informing students proactively. Both students and advisors needed more than just a searchable website to make these connections and decisions.

Working with the U.S. Department of Housing and Urban Development (HUD) and four public housing authorities, MDRC helped design and test a comprehensive effort to reduce rent burden as part of the Rent Reform Demonstration's Alternative Rent Policy. The project aimed to protect families against financial hardship and reduce the implicit tax on subsequent earnings gains, which could incentivize increased employment.12 The program reduced eligibility verification burdens for housing choice voucher program staff and residents, among other changes. Instead of verifying income every year and every time one's income changed, Rent Reform participants recertified for the program every three years, paid a simplified utility bill, and received more flexible time periods for hardship remedies.

These examples illustrate that even within large institutions serving thousands of people, it is possible to make system changes that reorient a program toward addressing participants experiencing undue burdens.

Other policy design options for people facing multiple, overlapping burdens, which agencies could implement in a pilot or test in a larger demonstration, include:

¹¹ See Caitlin Anzelone, Michael Weiss, and Camielle Headlam, <u>How to Encourage College Summer Enrollment: Final Lessons from the EASE Project</u> (New York: MDRC, 2020).

¹² James Riccio, "Designing an Alternative Rent Policy for the Housing Choice Voucher Program," Cityscape: A Journal of Policy Development and Research 22, 3 (2020): 139-161.

- Presumptive or proactive eligibility, as was used to issue the stimulus payments of 2020.¹³ When there is new earmarked funding, such as CARES Act, Medicaid expansion, pandemic Electronic Benefit Transfer (EBT), or other programs that have low ineligibility rates when agencies use existing administrative data, federal agencies themselves and state and local grantees can presumptively qualify people for a program. To ensure accuracy, agencies can conduct verification on a random sample of qualified participants. When the state and potential participants know from past or related data that the participants are already or highly likely eligible, the time required for application can misuse applicant and staff time that could be spent on planning for relevant services and supports.
- Consolidate application systems. Automation or digitization alone will not necessarily reduce burdens. But one-stop online application portals can save participants time and energy spent searching for application forms related to federal benefits such as SNAP, TANF, Medicaid, energy bill assistance, child care subsidies, and more. Different states take different approaches with their portals—some serve as a central hub to find links to each program while others are working toward a single application form for multiple benefits. 14 They also can reduce the time participants spend trying to understand whether or not they are eligible.
- Reduce the intensity of requirements for people with multiple burdens. Within a given program or system, moving from in-person application requirements to online, or moving from first-come, first-served assignments to random assignment, or moving from twice-yearly income verification

- to less frequent recertification all can benefit populations that face the intersecting burdens of unstable housing, unpredictable access to transit, and expensive child care. A systems change could be to design the distribution of grants or limited slots in a weighted lottery or essentially randomly assigning places among groups in order of the group's level of historical disadvantage or exclusion (where more excluded groups get assigned first or get more weight in the assignment process). This type of assignment already happens by design in many school assignment processes and could be used to distribute grants to community organizations or individuals who face multiple burdens or levels of past exclusion.¹⁵
- Remove small process requirements that impose financial strain. One example is to eliminate burdensome financial pre-commitments for students or families with low incomes. At City University of New York (CUNY) colleges, strained students' finances and inability to make the course registration deposit deadline also prevented automatic course credit transfer—until colleges recognized this burden and changed the system so that credits could transfer regardless of the financial deposit. The Montana University System reported that a new state policy to offer two free dual-enrollment courses to students statewide has had a positive effect on closing income-based enrollment gaps.¹⁶ These solutions do not mean that students do not pay for their credits or tuition, but rather that the sequence and timing of the payments do not impede course-taking.

Another example is removing steps that require participants to make active requests for changes

¹³ See Anthony Barrows, Rekha Balu, and Rebecca Schwartz, "Three Ways to Get Benefits to Families That Need Them," Governing (July 24, 2020).

¹⁴ State examples include Colorado, Wisconsin, and New York.

¹⁵ See MDRC's evaluation of New York City Small High Schools of Choice that relied on natural lotteries (2014).

¹⁶ See Alyssa Ratledge, Hannah Dalporto, and Erika B. Lewy, COVID-19 and Rural Higher Education: Rapid Innovation and Ideas for the Future (New York: MDRC, 2020).

that are almost uniformly beneficial. For example, in a collaborative study with the child support of-fice in Cuyahoga County, Ohio, we tested the effect of eliminating the need for parents whose incomes had changed to actively request a packet of materials to change their payments. Instead, the county proactively mailed a modification packet to a randomly selected set of parents eligible for payment modifications and saw a 12.4 percentage point increase in completed modification reviews compared to reviews for parents who had to actively request the mailing.¹⁷

Automatic or default enrollment in programs. For programs where under-enrollment of target populations signals undue process hassles or psychological costs, automatically enrolling clients who are already eligible may save staff and clients time and energy. One scenario for this sort of "default" step is preschool and kindergarten, for which many families often have already expressed an intention to apply but may not follow through because of small process hassles related to unfamiliar enrollment processes.¹⁸ A second scenario is programs that require income eligibility verification but are about delivering services rather than cash assistance, such as Head Start. A third scenario for automatic enrollment could be when processes otherwise would require manual review, such as college transfer. Some states like California and Michigan have enacted Associate Degrees of Transfer that show some promise at closing enrollment rates at bachelor's degree colleges.

Use personalized staff support to reduce multiple burdens for specific target populations. For students with multiple learning and behavior needs, families who need income support and child care, or people are who lack stable housing, the average intervention or communication is rarely sufficient. Targeted and individually tailored coaching, support networks, and nontuition financial support may help students stay in and complete programs, reducing inequitable disparities in outcomes.¹⁹ Larger impacts tend to come from comprehensive, long-term programs, which usually include case management to arrange referrals to necessary services and advising and counseling to help individuals make progress with those services. Meanwhile, nudges or small process changes sometimes can prioritize individuals who already have relatively higher resources and need only a small push to get them to the finish line.

Although more comprehensive supports are costly, their consistently positive impact, especially for people facing multiple burdens, suggests they are a worthwhile investment. For example, the Accelerated Study in Associate Programs at the City University of New York doubled graduation rates three years after students began the program, which provides students with up to three years of financial and academic support and other services. The program resulted in increased financial aid from the Pell Grant Program and the New York State Tuition Assistance Program, due to increased student enrollment and graduation, and reduced the grant dollars these programs invested per degree earned.²⁰

¹⁷ See Peter Baird and Rhiannon Miller, <u>Streamline or Specialize: Increasing Child Support Order Modification Review Completion in Ohio</u> (New York: MDRC, 2019).

¹⁸ See Balu, Condliffe, and Hennessy (2021).

¹⁹ See Hannah Dalporto and Betsy Tessler, <u>How Community Colleges Are Advancing Equity in Career and Technical Education</u> (New York: MDRC, 2020).

²⁰ See Gilda Azurdia and Katerina Galkin, *An Eight-Year Cost Analysis from a Randomized Controlled Trial of CUNY's Accelerated Study in Associate Programs* (New York: MDRC, 2020).

Reduce data collection and duplicative burdens for participants and program staff with efficient data linkages and use of administrative data (Qs 2b, 2i, and 2j).

Some agency grantees can be repeatedly selected for technical assistance and research studies because they meet certain infrastructure and sample size requirements, and individuals within those sites who participate in multiple programs can feel repeatedly studied if they are asked to share their perceptions and outcomes of multiple program experiences. There are implications for participant equity if only some are asked to disclose sensitive information repeatedly. For example, college and cash assistance programs that work with us report that Social Security Numbers are one of the more difficult identifiers for people to agree to share—especially among undocumented students and workers, as well as among communities that have historically had their private information misused.

For data collection, we recommend a hybrid approach: Use short, targeted surveys that collect only what is missing or outdated in administrative data for the target population (like education, age, income, or other data that may have been collected only once but would change over time). In addition, sometimes the data elements from Management Information Systems are not standardized to permit comparisons. For these sons, we try to collect baseline survey data where possible but in ways that minimize burden. There also are implications of repeatedly surveying participants, given survey nonresponse. However, recent research suggests that nonresponse bias is not related to survey response rates.²¹

When the government can't change the amount of information collected, federal agencies could draw on consumer tools to ease burden on local agencies (e.g., TurboTax-type tools that automatically pull federal tax info into state tax forms, or consumer benefits mobile apps to access benefits administration and upload necessary documentation) or the equivalent of the IRS Data Retrieval Tool with the Free Application for Federal Student Aid (FAFSA) for other benefits assistance applications.

We hope that this information that comes from our experience partnering with federal, state, and local agencies over the years proves useful to the Office of Management and Budget in its quest to "identify effective methods for assessing whether federal agency policies and actions equitably serve all eligible individuals and communities, particularly those that are currently or historically underserved." For questions about this submission, please contact Rekha Balu, MDRC, at rekha.balu@mdrc.org or 212-340-8616.

²¹ Richard Hendra and Aaron Hill, "Rethinking Response Rates: New Evidence of Little Relationship Between Survey Response Rates and Nonresponse Bias," Evaluation Review 43, 5 (2018): 307-330.

Dissemination of MDRC publications is supported by the following organizations and individuals that help finance MDRC's public policy outreach and expanding efforts to communicate the results and implications of our work to policymakers, practitioners, and others: The Annie E. Casey Foundation, Arnold Ventures, Charles and Lynn Schusterman Family Foundation, The Edna McConnell Clark Foundation, Ford Foundation, The George Gund Foundation, Daniel and Corinne Goldman, The Harry and Jeanette Weinberg Foundation, Inc., The JPB Foundation, The Joyce Foundation, The Kresge Foundation, and Sandler Foundation.

In addition, earnings from the MDRC Endowment help sustain our dissemination efforts. Contributors to the MDRC Endowment include Alcoa Foundation, The Ambrose Monell Foundation, Anheuser-Busch Foundation, Bristol-Myers Squibb Foundation, Charles Stewart Mott Foundation, Ford Foundation, The George Gund Foundation, The Grable Foundation, The Lizabeth and Frank Newman Charitable Foundation, The New York Times Company Foundation, Jan Nicholson, Paul H. O'Neill Charitable Foundation, John S. Reed, Sandler Foundation, and The Stupski Family Fund, as well as other individual contributors.

The findings and conclusions in this report do not necessarily represent the official positions or policies of the funders.

For information about MDRC and copies of our publications, see our website: www.mdrc.org. Copyright © 2021 by MDRC®. All rights reserved.

NEW YORK 200 Vesey Street, 23rd Flr., New York, NY 10281 Tel: 212 532 3200 OAKLAND 475 14th Street, Suite 750, Oakland, CA 94612 Tel: 510 663 6372

WASHINGTON, DC 750 17th Street, NW, Suite 501 Washington, DC 20006

