



A PROJECT OF MOTHER'S OUTREACH NETWORK

DC Guaranteed Income Coalition

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Title of the Collection:

Understanding Economic Risk for Low Income Families: Economic Security,
Program Benefits, and Decisions about Work

To: Office of the Assistant Secretary for Planning and Evaluation



When reviewing this Agency Information Collection Request for Understanding Economic Risk for Low Income Families: Economic Security, Program Benefits, and Decisions about Work, the DC Guaranteed Income Coalition felt this was an important opportunity to provide comments and recommendations from our respective pilot and programs in Washington, DC. The DC Guaranteed Income Coalition is comprised of DC area nonprofits and community members and is committed to achieving a permanent guaranteed income in Washington, DC that establishes and supports DC residents above an income floor to meet their basic needs and live lives of dignity.

We know the benefits cliff occurs when a small increase in earnings means a family no longer can receive a public benefit which was helping them to feed their families, afford medical care, access quality childcare, or otherwise balance their budget. The benefits cliff can be a barrier to economic stability. Research from the Federal Reserve Bank of Atlanta found that “these benefit cliffs can be so severe that low-income workers may be temporarily better off financially by not advancing to take a higher paying job.”¹ For example, policy changes in Ohio, such as the Benefit Bridge, over the past several years have improved benefits cliffs for the state’s low-income workers, especially workers with children.

But there is much more that can be done and the findings from the proposed study can greatly contribute to the development of federal policy around the benefits cliff. Based on our work done on guaranteed income in Washington, DC, we have comments on the following subjects:

The necessity and utility of the proposed information collection for the proper performance of the agency’s functions

The Department of Health and Human Services is charged with, among other things, determining the impact and efficacy of policies and programs which it funds. It is critical to determine how benefits provided through agency programs impact the lives of those populations that receive them. Importantly, it is necessary to determine whether the impact of these programs meet their intended goals, and if not, how they should be changed. But in no instance should these policies and programs do harm. Moreover, these programs and policies should promote economic stability and support family resilience.

The accuracy of the estimated burden

THRIVE East of the River, a guaranteed income pilot, supported by members of the DC Guaranteed Income Coalition, found in its implementation that participants - low income families - expressed “skepticism and fear of financial fraud during initial recruitment and enrollment ... especially when asked for sensitive personal information, i.e. name, address, bank account information.”² Trust had to be gained through extended conversations with potential enrollees. While the HHS study may not raise the same level of concern, it may take longer

¹ Policy Change Can Reduce Benefit Cliffs and Incentivize Work, The Center for Community Solutions, 2022.

² An Evaluation of THRIVE East of the River, Urban Institute, 2022.



than expected to gain the trust of participants. Also, while the vignettes are expected to be completed in one encounter, it may take more than one encounter to complete. To better understand the burden, it may be helpful to engage a “focus population” advisory board to bring the perspective of participants into the study design and implementation.

Ways to enhance the quality, utility, and clarity of the information to be collected.

The impact of increasing family income, as result of employment or participation in a guaranteed income pilot, has been well documented in guaranteed income pilots nationally. It may be useful to discuss with organizations that have implemented pilots or in the process of implementing a pilot what data is needed. Potentially, these pilot programs could know from their incoming evaluation data what data should be expanded upon or what data is needed in the future development of public policy. In recruiting participants to the study, it may be helpful to have trusted community voices who can authenticate the study and its purpose.

The use of automated collection techniques or other forms of information technology to minimize the information collection burden.

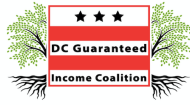
Barriers to technology come up often with the low-income families we work with. It is important to address the difficulties related to having computers or other devices, access to broadband and wi-fi, and skill in using technology. All these factors impact the information HHS will be able to collect using the proposed web-based survey data collection tool. The concern is that HHS using a web portal to conduct the survey does have access challenges for this population. Access to the survey will require technology infrastructure and support staff. HHS will be translating the web-based survey into several languages but also need support staff available to answer questions and concerns who are fluent in those languages.

In a Pew Research Center survey of US adults, conducted Jan. 25-Feb. 8, 2021, “roughly a quarter of adults with household incomes below \$30,000 a year (24%) say they don’t own a smartphone.³ About four-in-ten adults with lower incomes do not have home broadband services (43%) or a desktop or laptop computer (41%). And a majority of Americans with lower incomes are not tablet owners.” As of early 2021, 27% of adults living in households earning less than \$30,000 a year are smartphone-only internet users. That is, they own a smartphone but do not have broadband internet at home.” Surveys should be developed specifically to be used on smartphones and not just mobile friendly for the device.

Based on data and the experiences of guaranteed income pilots, a web-based survey may be challenging for the focus population.⁴ Without the technology infrastructure, survey participants will have limited capacity to respond to the vignettes and provide important data for the survey.

³ Digital divide persists even as Americans with lower incomes make gains in tech adoption, Pew Research Center, 2021.

⁴ Building aid applications that are actually accessible, Give Directly, 2022.



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The following are recommendations to help the automated collection be as seamless as possible. It is found that the forms should be brief, sticking only to the essentials and asking only for necessary information based on previous answers. The questions should be transparent, explaining throughout why this information is being collected to encourage trust and patience in the process. The technology could have a single-page design with continuous auto-saving.

In Conclusion

Now is the time to create federal policy around the benefits cliff that limits its negative impact on families and supports a pathway to gain the flexibility and choice necessary to meet a family's life experiences. The results of this study, similar to guaranteed income studies nationally, will provide HHS with a better understanding of the economic risks that people weigh when they make decisions about increasing earnings. This study can provide direction for HHS and will inform HHS policy and programs at large, and further lines of research around benefit programs and employment decisions.

Thank you for your consideration,

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