NAWRS Research Academy 2012

PowerPoint slides

Slide 1	RESEARCH ACADEMY PLENARY
Slide 2	Steve Bell, Getting the Policy Answers You Need
Slide 10	RESEARCH ACADEMY SESSION #1
Slide 11	Rick Hendra, What Can We Learn From Experimentation in Business?
Slide 29	Kinsey Dinan , Building Random Assignment into a NYC Child Support Program Pilot
Slide 44	Erik Beecroft , EITC Take-Up by Public Assistance Recipients, and Impacts of Outreach
Slide 63	RESEARCH ACADEMY SESSION #3
Slide 64	Mike Fishman, Using Small-Scale Random Assignment Experiments to Learn What Works
Slide 74	Karen Gardiner , Using Random Assignment to Learn What Works: Example from an ISIS Site

PLENARY SESSION



Getting the Policy Answers
You Need

The Latest in How
Randomized Evaluations
Can Inform State/Local
Policy Decisions

Stephen H. Bell

Senior Fellow, Vice President Abt Associates

Presentation to the NAWRS/NASTA 2012 Workshop – Research Academy Plenary Session

August 20, 2012

Scientific Progress to Serve You Better

Research methodologists are improving randomized impact evaluations to provide stronger evidence of effectiveness for local and state policy decision-making Three themes . . .

- Beyond Verdicts: Impact Research that Improves Policy
- Easier to Take: Design Improvements to Ease the Challenges of Random Assignment
- Cheaper, Faster, Better: No Kidding

But first, an example . . .

Investing in Innovation – Dozens of Local Tests of Educational Reforms

- Over 70 local evaluations funded by the U.S. Department of Education [called "I-3"]
- Grantees required to do research that adds to existing evidence of (i) promise, (ii) effectiveness, or (iii) scaleup
- Abt Associates scientists have butressed study rigor,
 nearly half running experiments
 - sponsors finding designs feasible and affordable
 - random assignment process/compliance is good
- Following same model at U.S. Dept. of Labor (WIF)
 Corporation for National and Community Service (SIF)

Beyond Verdicts: Impact Research That Improves Policy

Addressing "What Works?" & "What Would Work Better?"

- Follow subsets of clients through different program components, matching them to control group counterparts → what produces larger impacts (Peck, 2012)
- Relate sites' program design/implementation to variations in effectiveness (Bloom, Hill, & Riccio, 2003)

Easier to Take: Easing the Challenges of Random Assignment

- Let program staff designate the clients they most wish to serve—"program-preferred RA"—and give them better odds of becoming treatments (Olsen & Bell, 2007)
- Combine a single control group with multiple treatment groups to learn more in one trial similar to "factorial designs" in manufacturing (Collins et al., 2011)
- Give the control group the intervention in just 6 or 12 months . . . while still measuring long-run impacts experimentally (Bell & Bradley, 2012)

Cheaper, Faster, Better: No Kidding

Work is underway or being planned to . . .

- Leverage large-sample administrative databases to learn more from small-sample outcome surveys
- Turn evidence from nationally-encompassing, but locally-stunted, randomized evaluations into guidance for state & local programs through statistical modeling
- Translate emerging evidence from long-running random assignment experiments to current conditions and policy implications through formal extrapolation



Getting the Policy Answers You Need

The Latest in How
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RESEARCH ACADEMY SESSION #1

Presentation 1

What Can We Learn from Experimentation in Business?



Rick Hendra, MDRC August 21, 2012 | Baltimore MD

NAWRS Conference

Donald Campbell, Pioneer of Random Assignment Evaluations

"The United States and other modern nations should be ready for an experimental approach to social reform, an approach in which we try out new programs designed to cure specific social problems, in which we learn whether or not these programs are effective, and in which we retain, imitate, modify, or discard them on the basis of apparent effectiveness."

Social policy tests still uncommon

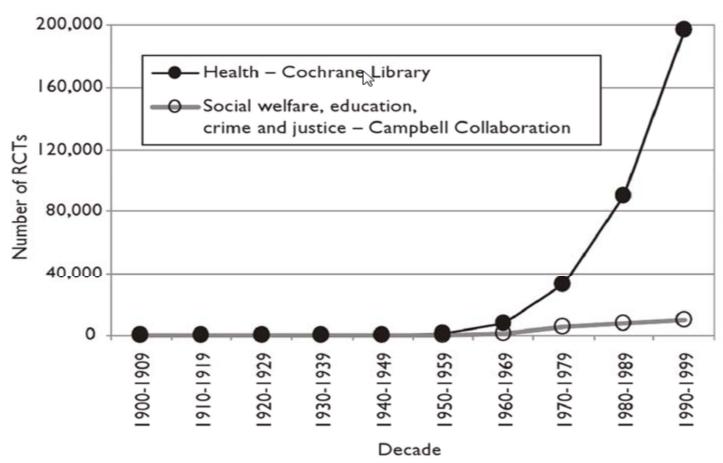


Figure 2. 20th century RCTs in health and in social welfare, education, crime and justice4

From Haynes et al. (2012) "<u>Test, Learn, Adapt: Developing Public Policy with Randomized Controlled Trials</u>." http://www.cabinetoffice.gov.uk/sites/default/files/resources/TLA-1906126.pdf

Experimentation has become commonplace in many industries

- Experimental "culture" in many businesses has perhaps come closer to Campbell's ideal.
- Real feedback loops, sufficient numbers of experiments to make substantial impact.
- Companies are competing based on insights gleaned from RCT evidence.





- A corporation completely built on random assignment experiments.
- Market cap: \$19 billion.
- 60,000 experiments per year.
- According to George Overholser, the credit card industry is now "purely evidence-based"

Sources:

Competing on Analytics: The New Science of Winning. By Thomas Davenport and Jeanne Harris. Harvard Business School Press: 2007.

Presentation by George Overholser at MDRC



Not using a control group: a "fireable offense"

"Honestly, my only surprise is that it is easier than I would have thought. I remember back in school how difficult it was to find rich data sets to work on. In our world, where we measure virtually everything we do, what has struck me is how easy it is to do this. I'm a little surprised more people don't do this."

-Gary Loveman, CEO Harrahs Casinos

Example: randomized experiments determined optimum weekday to send Southern California residents Los Vegas travel Sources.

<u>Competing on Analytics: The New Science of Winning</u>. By Thomas Davenport and Jeanne Harris. Harvard Business School Press: 2007.

http://sloanreview.mit.edu/improvisations/2011/03/03/in-experiments-we-trust-from-intuit-to-harrahs-casinos/

Other "Learning" Companies









Google

10,000 experiments/year in 2009: 10% led to business changes *

*Uncontrolled: The Surprising Payoff of Trial-and-Error for Business, Politics, and Society by Jim Manzi. Basic Books: 2012.

Distinct features of Business Experiments

- Easier: Data sets with key inputs and outcomes with large sample sizes readily available.
- Accelerated project lifecycles since time to outcome is usually shorter.
- Isolate single innovations: e.g. location of "shopping cart" on website, font of marketing offer, coupon face value, tweaks to movie recommendation algorithm.
- Real feedback loops, automated learning.
- Subgroup analysis "baked in."
- Surveys cheaper, lower standards.
- ROI analysis customary.



Marketing Studies

- Looked at effectiveness of point of sale coupons and ads.
- 300 million shopping transactions per week collected via scanners over nearly 100 stores.*
- Used loyalty cards to track shopping beha
- Point of sale coupons sold based on what you buy.
- Nearly every campaign was tested as RCT.
- Randomized shoppers (if coupons) or stores (if testing shelf ads etc).

^{*} http://www.informationweek.com/global-cio/interviews/catalina-marketing-aims-for-the-cutting/231600833

Test small before rolling out big tests

- Quick survey or focus group to inform an advertising or couponing strategy
- Laboratory test before roll out of large study (copy testing)...similar to behavioral economics approach
- Pull program and control loyalty IDs
- Track shopping behavior via population scanner data in participating stores
- Run analysis using same methods as used in social policy trials

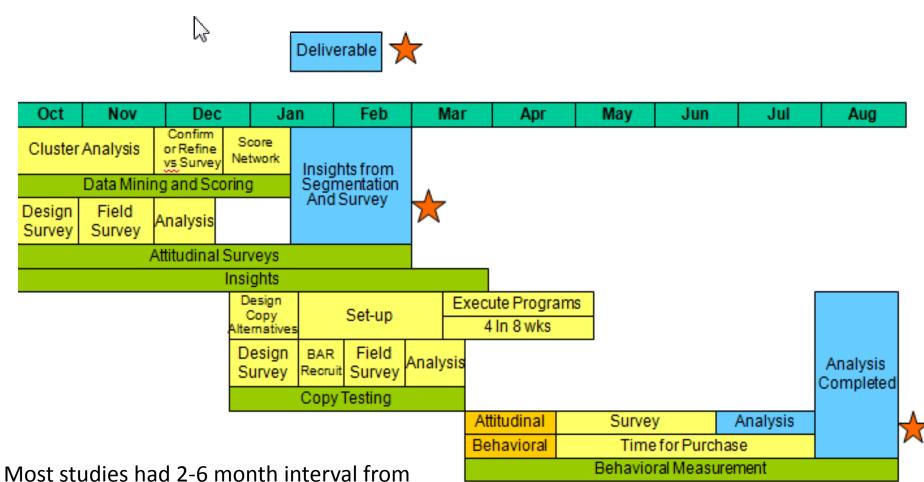
Advertising Behavioral Measurement Design

-To Disentangle Messaging Innovations from Targeting Innovations

Random Assignment to Nine Research Groups (35,000 per group)

TARGETS (Subgroup)	Treatment 1 (Current ad)	Treatment 2 (Alternative ad picked based on copy testing)	Control Group (No Ad)
Heart Healthy Segment	Group A	Group B	Group C
Organic Shopper Segment	Group D	Group E	Group F
Demographic Segment	Group G	Group H	Group I

A "Long Term" Study in Marketing (11 months)



the beginning of program to final analysis.

Manzi: High frequency experimentation needed for faster evolution in public policy

- Occasional "Moonshot" studies insufficient to produce the kind of evolution that numerous quick studies would.
- "Causal density" of most policy problems requires numerous studies to really produce progress.
- Experiments don't always need to be expensive, particularly if your key outcomes are sitting in your enterprise data.
- Random assignment process and back end statistics relatively easy (but there are some pitfalls).

Source: <u>Uncontrolled: The Surprising Payoff of Trial-and-Error for Business, Politics, and Society</u> by Jim Manzi. Basic Books: 2012.

Be Careful: Many things can go wrong in a random assignment study.

- Data leakage (you don't see what isn't covered in your database)
- Attrition (e.g. your database stops tracking people after they leave TANF)
- Improper data preparation: can easily screw up data analysis and end up w/a non-experiment
 - If you limit analysis to the takers only
 - if you don't add zeroes properly
 - if you don't properly time code outcomes
 - if you use post randomization covariates
 - Etc. Etc.
- RA seems easy, but a lot can go wrong:
 - Gaming
 - Duplicates/Crossovers
 - Improperly storing research codes
 - What seems random isn't always random (e.g. systematic sampling)

Consider working with experienced researchers for advice when starting out

- Academics, contractors, consultants, etc.
- Ex: MDRC worked with the Department of Work and Pensions for the UK ERA study partly to build their capacity to do their own experiments and now DWP routinely conducts internal experiments.*

* Haynes et al. (2012) "Test, Learn, Adapt: Developing Public Policy with Randomized Controlled Trials." http://www.cabinetoffice.gov.uk/sites/default/files/resources/TLA-1906126.pdf

Experimentation is harder for social policy

- Much less control over environment
- Costly (e.g. survey costs)
- Data acquisition is time consuming
- •Outcomes take longer to emerge (e.g. training programs)
- Need years sometimes for sample intake whereas in business experiments sample is usually available at all times
- Harder to convince actors to undergo random assignment (business experiments are usually proprietary/not public)

Getting to Corporate Model of "Constant Embedded Evaluation"* Depends on Conditions

- Flexibility to innovate
- Nature of question ex: test different forms of outreach (social media v. traditional) for voluntary employment services.
- Time to outcome (ex: can quickly measure show rates, more slowly employment rates)
- Skill set
- Availability of data (e.g. New Hires)
- Availability of large samples
- Think creatively of challenge of pulling off studies

^{*} George Overholser, formally Capital One (now Third Sector Capital Partners)

Presentation 2

Building Random Assignment into a NYC Child Support Program Pilot

Kinsey Dinan

Deputy Director, Office of Evaluation and Research NYC Human Resources Administration

NAWRS-NASTA 2012 Workshop Baltimore, MD August 20, 2012

The Cash Assistance Agreement Pilot (CAAP)

A Brief Overview

The Issue

Greater NCP cooperation is needed to increase our order establishment rate.

- Custodial parents (CPs) of children receiving cash assistance are required to cooperate with child support enforcement, but orders are successfully established in only half of these cases.
- The majority of court referrals are dismissed, typically because the noncustodial parent (NCP) doesn't show and isn't "served": >10K dismissals (67% of total) in FY 2012.

The Theory

Lack of NCP cooperation stems in part from an aversion to court.

- In NYC, child support orders are established at Family Court.
- Discussions with NCPs and advocates suggest that the court process is viewed as adversarial and confusing; participants have little opportunity to speak, ask questions, "be heard."
- Previous (negative) experience with the criminal justice system may exacerbate the issue for some.

The Pilot

Alternative order establishment process in which NCPs do not have to go to court.

- Cases in pilot site (Manhattan) screened for pilot eligibility;
 exclusions include interstate cases, cases with DV history, etc.
- If eligible, letter included with the court summons, inviting NCP to come to the Child Support Customer Service Office in advance of the court date; CP is also asked to attend.
- At Customer Service, staff explain the child support process in detail and provide an opportunity for parents to ask questions and discuss their situation.
- → If an agreement is signed, parents don't have to go to court.

Key Steps in Establishing a Randomized Controlled Trial

1. Define Key Pilot Outcomes

CAAP Goals

- Increase the number of child support orders.
- Improve compliance with orders (increase amount and frequency of payments).
 - Less default orders; orders better aligned to income.
 - NCPs more vested in outcomes, with better understanding of the child support process.
- Reduce # of days between court referral and order establishment.
 - Avoid court adjournments (most cases adjourned at least once, and each adjournment adds 6-8 weeks).

2. Identify Appropriate Evaluation Design

How do you establish the counterfactual?

- Considered pre/post and comparison group design...
 - General problems with making reliable comparisons across time and across place were compounded by ongoing agency efforts to increase program effectiveness, including other small-scale pilots.
 - Existing data insufficient to develop a good baseline or valid comparison group; would need to create and track a pre-pilot cohort or a pilot-eligible cohort in a different site.
- Randomized controlled trial (RCT) appeared most reliable and easiest to implement.

3. Make Your Case to Program Staff

- Staff raised several concerns, including:
 - RCT would reduce the # of cases in the alternative process, thus reducing the # of "successes" (agreements).
 - RCT would further complicate implementation in pilot site; staff already concerned about workload.
 - More generally, some not convinced of the added value of a formal evaluation (beyond program reporting).

→ Agreement on RCT design reached!

- Child support program leadership committed to a rigorous evaluation of pilot effectiveness.
- Measures taken to address concerns: e.g., control group limited to 40% of pilot cases and delayed until month 3.

Pilot Implementation & Preliminary Results

4. Implementation

- Pilot launched in May 2011; RCT started in July.
- Extensive investment of time and resources required to establish and implement new procedures and data tracking/reporting system.
- Site visits and conversations with staff confirm that implementing random assignment was a small lift.
 - Random assignment occurs after cases are identified as pilot-eligible, using a table with randomlygenerated **Treatment** and **Control** rows.
 - Parallel sets of "action codes" (and different colored folders) used to track the two groups.

5. Preliminary Results

- Interpreting results has been a greater challenge.
 - At Customer Service, NCP show rate disappointing.
 - Agreement rate among those who show lower than expected; many cases have to be referred to court.
 - Overall order establishment rate for treatment group is far higher than expected, especially among NCPs who showed at Customer Service.
 - Control group results suggest no impact on order establishment – order rate is similarly high.
 - Based on initial interviews with staff and NCPs at Customer Service, pilot experience is very positive.
- → In 2012, pilot was expanded to all NYC boroughs.

Table 1. Order Establishment Rate: *Preliminary Results*

Treatment Group	
Order establishment rate	58.5%
% of NCPs who showed at Customer Service	25.8%
Among NCPs who showed at Customer Service,	
% who signed an agreement	17.6%
Order establishment rate (including via signed agreement)	85.8%
Among NCPs who did not show at Customer Service,	
Order establishment rate	49.0%
Control Group	
Order establishment rate	58.5%

Results as of July 27, 2012 for cases referred to court between July 2011 and March 2012 (n=520 for treatment group; n=340 for control group); excludes the 4% of cases that do not yet have a final outcome.

6. Next Steps

- Analyze order establishment rate again, with increased sample size.
- Analyze other outcomes: payments on orders; days between court referral and order establishment.
- Cost analysis, data permitting.
- Process evaluation, based on:
 - Administrative data on key steps in pilot process.
 - Interviews with key staff and with NCPs who did/did not keep their appointments at Customer Service.
 - Observations of Customer Service appointments.

Presentation 3

EITC Take-Up by Public Assistance Recipients, and Impacts of Outreach

Erik Beecroft
Virginia Dept of Social Services
August 20, 2012

Context: VDSS

- Administers SNAP, TANF, child support, child welfare and many smaller programs.
- Reached close to 1 in 5 Virginians in 2011, about 1.5 million people.
- Mission is to help families lift themselves out of poverty.
- State law requires VDSS to notify clients with earnings about the federal EITC.

VDSS EITC Outreach

- 2006 legislative study said EITC participation rates for VDSS clients was only 13%.
- Recommended changes in state law:
 - Add to state tax form a checkbox for whether received federal EITC, and amount;
 - Enable Va Dept of Taxation to share data with VDSS on EITC receipt.
- The law was changed, and VDSS does data matches twice per year:
 - December: tax return and UI earnings to identify EITC-eligible non-claimants for current tax year;
 - September: tax return and W-2 earnings to identify EITC benefits claimed and un-claimed for prior tax year.

Va Individual Tax Form 760

	_	er than Line 29, รเ nformation	ubtract Line 29 from L Account Type	ine 26. YOUR REF		31 Savings			. 00
For domestic refunds only.		•	Your bank routin	ng transit number			Your bank ac	count number	
Fill in all Qualifying farmer, fisher			fisherman or mercha	nerman or merchant seaman		Federal Schedule C filed with your federal return			
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VDSS EITC Outreach (cont.)

- Send post cards to 50,000 EITC-eligible nonclaimants.
- Also do automated phone calls.
- Q: Does it work?
- A: Random assignment!













- Based on your earnings in 2011, you may be eligible for the Earned Income Tax Credit (EITC). You must file your taxes to qualify.
- The EITC can provide you with a refund of up to \$5.571 based on family size and income. You can file your taxes for FREE at an IRS approved free tax preparation site.
- The EITC helps millions of families each year pay bills, lower debts, meet basic needs, and save for the future.
- File your taxes for free and claim the ETC. To find a free tax prep site near you dial 2-1-1 or visit www.211virginia.org.

This message is brought to you by:











- Basado en sus ingresos de 2011, es posible que usted sea elegible para el Crédito por Ingreso del Trabajo, o ETC por sus siglas en inglés. Para calificar, hay que presentar su declaración de impuestos.
- El EITC puede proveerle con un reembolso hasta \$5,571, basado en el temaño de su familia y sus ingresos. Usted puede declarar sus impuestos SIN COSTO en un sitio de preparación de impuestos gratis aprobado por el IRS.
- Cada año el EITC ayuda a millones de familias a pagar sus cuentas, reducir sus deudas, satisfacer sus necesidades básicas, y ahorrar para el luturo.
- Declare sus impuestos gratis y solicite el EITC. Para encontrar un sitio de preparación de impuestos gratis cerca de usted, llame al 2-1-1 o visite www.211virginia.org.

Se presenta este mensaje gracias a:











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Text of Phone Call

"I am calling for [name_first name_last name_suffix] on behalf of the Virginia Department of Social Services. Based on your earnings in 2011, you appear to be eligible to receive a federal tax refund for the Earned Income Tax Credit. Even if you do not owe any taxes and are not required to file a tax return, you can still receive a refund.

To find out your EITC refund amount, you can use the calculator on www.virginiafreefile.org.

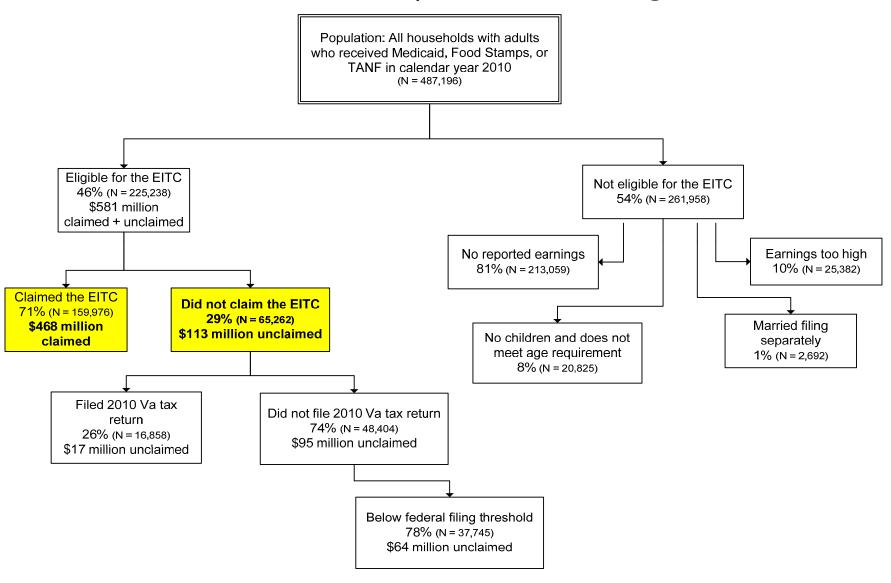
If you are eligible for a refund, you can get your taxes done for free by a volunteer income tax preparer. To find the free income tax preparation center closest to you, dial 211, or go to www.virginiafreefile.org.

Again, to find the free income tax center closest to you, dial 211."

Question 1

 What is the EITC take-up rate? How much is claimed and un-claimed?

EITC Eligibility and Participation in 2010 for Medicaid, Food Stamps, and TANF Clients in Virginia



Question 2

 Why do some EITC-eligible clients not claim the EITC?

Characteristics of EITC Eligible Non-Claimants and EITC Claimants, Among Recipients of Public Assistance, By Family Type, Tax Year 2010

Characteristic	EITC Eligible Non- Claimants		EITC Claimants		
Single Parents with Children (75% claimed EITC)					
Median EITC benefit (estimated)	\$	2,063	\$	3,053	
Median taxable income (estimated)	\$	6,359	\$	12,695	
Income above filing threshold (%)		31.0		69.2	
Worked 4 UI-covered quarters in 2010 (%)		25.9		57.0	
White (%)		43.9		40.8	
Non-Hispanic (%)		95.7		94.0	
One child (%)		62.6		47.0	
Two children (%)		20.1		37.5	
Average age of adult (years)		32.1		33.6	
Number of households	34,	963	105	5,632	

Question 3

Does EITC outreach work?

Impacts of Outreach on Percentage of Households Filing Tax Returns and Claiming EITC

		Difference from Control Group			
Tax Year and Outcome	Control Group	Received Phone Call and Mailer	Received Phone Call Only	Received Mailer Only	
2010	(n= 4,000)	(n= 3,000)	(n= 1,500)	(n= 46,946)	
Filed state tax return (%)	53.8	<mark>2.4*</mark>	1.6	0.5	
Claimed federal EITC (%)	38.8	<mark>0.9</mark>	-0.7	0.5	
2009	(n= 4,000)	(n= 1,970)		(n= 43,382)	
Filed state tax return (%)	41.2	4.1**	n.a.	1.1	
Claimed federal EITC (%)	30.5	<mark>3.2**</mark>	n.a.	0.6	

Question 4

• Is EITC outreach cost-effective?

Benefits and Costs of Targeted EITC Outreach

Costs of outreach	
Labor cost to identify outreach sample (40 hours)	\$ 1,500
Labor cost to oversee outreach efforts (160 hours)	\$ 5,000
Mailer, at \$0.35 each	\$ 24,500
Automated telephone calls, at \$0.16 each	\$ 11,200
Total cost	\$ 42,200
Benefits of Outreach	
Additional EITC claims, assuming impact of 2% and average benefit of \$1,700	\$ 2,380,000
Approximate Benefit-Cost Ratio	50:1

Key Points

- Random assignment may be easier than other causal designs, and is more credible.
- EITC eligible clients do not claim because they are not required to file a tax return.
- EITC can change lives.

Next Steps

- Check results for tax year 2011.
- Talk to eligible non-claimants?
- Use behavioral economics to improve outreach

More Information

- Full paper is at <u>www.dss.virginia.gov</u>
 - /Reports ... Earned Income Tax Credit

 Share your thoughts: erik.beecroft@dss.virginia.gov

RESEARCH ACADEMY SESSION #3

Presentation 1

Using Small-Scale Random Assignment Experiments to Learn What Works

Mike Fishman August 22, 2012 NAWRS

Hard to know if our policies, programs and processes are working

- Unadjusted outcomes can be deceiving external events, changing environments, participant characteristics, and participant motivations can confound our perceptions
- Random assignment evaluations considered the "gold standard" for disentangling "impacts" from "outcomes"
- Random assignment evaluations generally perceived as hard to do, time-consuming and expensive to finance
- Many of us rely on outcomes in the absence of impact evidence – we "satisfice"

Random Assignment (RA) Studies don't have to be expensive, lengthy, or hard to implement

- Administrative data can be used to collect key impact data (program participation, employment, benefit payments, child support collections)
- RA process itself can be easily automated
- Duration of study based on three things:
 - Time to build sample;
 - How long it takes to implement intervention; and
 - Follow-up period needed to assess impacts
- Random Assignment impact analysis can be relatively simple – doesn't require complex econometrics –

Areas that could lend themselves to RA studies

- Alternative client intake and work program processes and sequences
- Sanction policies and processes
- Earnings Disregards/ financial incentives
- Job Club approaches
- Approaches to client outreach and information distribution

RA Studies do need to be carefully designed and implemented

- Well defined research questions and relevant data sources
- Clear treatment/control difference
- Rigorous implementation of RA procedures
- Process/implementation study to understand impacts

Key Steps in RA Studies

- Define Research Question(s)
- Define treatment and control group services
- Determine sample size needed to assess impacts
- Develop a client flow model
 - Where do participants come from?
 - How do they currently move through the service delivery process?
 - Identify point of random assignment
 - Define post random assignment flow for treatment and control group members

Key Steps in RA Studies (cont.)

- Identify data to be collected at baseline and for outcomes using existing administrative data wherever possible (baseline data must be current)
- Develop informed consent (if needed)
- IRB Review (if needed)
- Develop random assignment procedures manual
- Train staff in RA procedures as appropriate
 - RA training should be as close to start of RA as possible

Key Steps in RA Studies (cont.)

- Begin random assignment
- Monitor random assignment
- Early assessment
 - RA procedures
 - Treatment Group services
 - Control Group services
- Implementation research
- Impact Analysis
- Benefit-Cost Study

Contact Information

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Presentation 2

Using Random Assignment to Learn What Works: Example from an ISIS Site

Karen Gardiner Abt Associates



NAWRS August 22, 2012 Baltimore, MD

The Site

- Community-based organization founded in 1995 in Lower Rio Grande Valley (Texas)
- Program aims to help residents train for and compete for jobs in area
 - Low income, Latino, many single parents
 - Unemployed, underemployed or on public assistance
- "Career Pathways" program provides tuition and other financial assistance and strong counseling component

Why Participate in RA Study?

- Site knows its program is effective but wants to demonstrate its impact on individuals rigorously and officially
- Desire to demonstrate to funders that program "works"
- Opportunity to "scale up" and serve more participants
- National attention to program

Research Questions

- What is the impact of the program on persistence in education and achievement of credentials and degrees?
- What is the impact of the program on careertrack employment and earnings?
- What is the impact on well-being?

Study Components

ISIS will include site-specific:

- Impact study
 - Using baseline data, administrative data (UI, college records), survey
- Implementation study
 - Interviews, staff surveys and site-level administrative data
- Cost-benefit study

Study parameters:

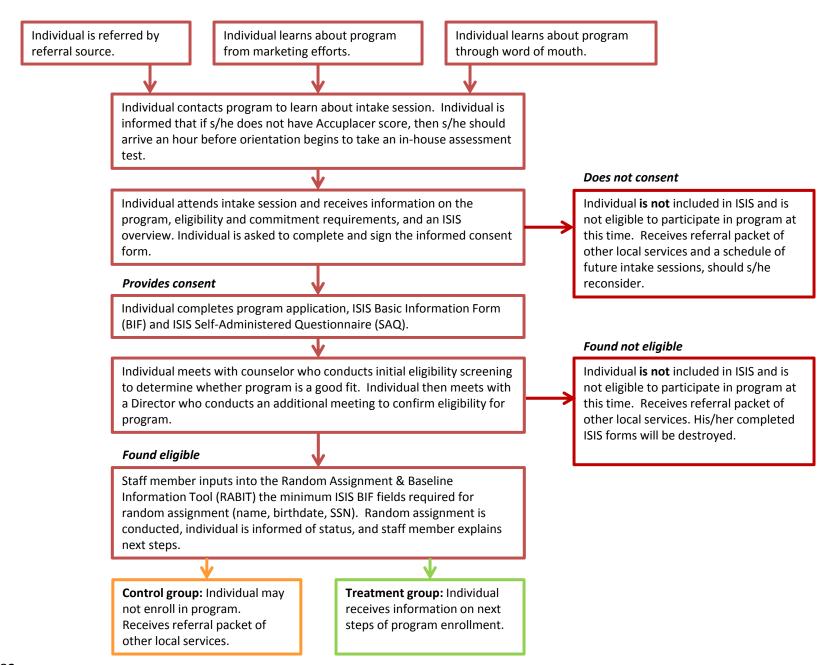
- Randomly assign a minimum of 1,000 eligible individuals to treatment and control groups
 - Control group can access other service in the community
- Two year sample size build up

Preparing for the Study

- Engage stakeholders
 - Local WIBs and other funders
 - Local and state politicians
 - Representatives from local colleges and partner organizations
 - Kickoff event
- Retool outreach
 - New referral sources
 - Market program via print, TV, radio, word of mouth
- Refocus messaging
 - Lottery aspect of program admission
 - Well in advance of starting RA

Study Procedures

- Incorporate evaluation data collection into eligibility process
 - What information is collected?
 - Program application + study forms: Informed Consent, Baseline Information Form and Self-Administered Questionnaire
 - When is information collected?
 - Intake session: Group-based (new), multiple locations, confirm eligibility
- Random assignment
 - Same day as intake
 - Web-based tool
 - Ongoing, intensifies near start of college terms
 - Efforts to engage



Study Procedures (cont.)

- Treatment group: meet with counselor to begin program
 - Weekly meetings; good method to monitor participation
- Control group: referral list
 - Two year embargo

Additional Information

www.projectisis.org

Project Director	Federal Project Officers
Karen Gardiner Karen gardiner@abtasoc.com (301)347-5116	Brendan Kelly <u>Brendan.Kelly@acf.hhs.gov</u> (202)401-5695
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