

# Supporting Statement Part A

OMB No. 0584-[NEW]

*Assessment of Mandatory E&T Programs*

MONTH XX, 2018

**Project Officer: Jordan Younes**

Office of Policy Support  
Food and Nutrition Service  
U.S. Department of Agriculture  
3101 Park Center Drive  
Alexandria, VA 22303  
703-305-2935  
[Jordan.younes@fns.usda.gov](mailto:Jordan.younes@fns.usda.gov)

# Contents

---

Part A. Justification.....	1
A.1    Circumstances That Make Data Collection Necessary.....	1
A.2    Purpose and Use of the Information.....	2
A.3    Use of Information Technology and Burden Reduction.....	7
A.4    Efforts To Identify Duplication and Use of Similar Information.....	8
A.5    Impacts on Small Businesses or Other Small Entities.....	9
A.6    Consequences of Collecting the Information Less Frequently.....	9
A.7    Special Circumstances Relating to the Guideline of 5 CFR § 1320.5.....	10
A.8    Comments in Response to the Federal Register Notice and Efforts To Consult Outside Agency .....	10
A.9    Explanation of Any Payment or Gift to Respondents.....	11
A.10   Assurance of Confidentiality Provided to Respondents.....	11
A.11   Justification for Sensitive Questions.....	13
A.12   Estimates of Hour Burden, Including Annualized Hourly Costs.....	13
A.13   Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers.....	18
A.14   Annualized Cost to Federal Government.....	18
A.15   Explanation for Program Changes or Adjustments.....	19
A.16   Plans for Tabulation and Publication and Project Time Schedule.....	19
A.17   Reason(s) Display of OMB Expiration Date Is Inappropriate.....	20
A.18   Exceptions to Certification for Paperwork Reduction Act Submissions.....	20
References.....	20

## Tables

---

Table A.8.1: Individuals Consulted Outside the Agency.....	11
Table A.12.1. Total Public Burden Hours and Respondent Costs.....	15
Table A.16.1. Project Time Schedule.....	20

## Appendices

---

A. Legal Authority Statutes and Regulations	
B.1 Study Objectives Response to Supporting Statement Question 2	
B.2 Research Objectives and Questions by Data Source	
C.1 Recruitment Email from FNS to States	
C.2 Follow Up Email From Study Director to States To Schedule Call	

- D. Study Overview and Frequently Asked Questions
- E. State SNAP Director and E&T Director Interview Protocol
- F. Local SNAP Office Director Interview Protocol
- G. Local SNAP Office Eligibility Worker Interview Protocol
- H. Process Mapping Protocol
- I. Observation Checklist
- J. Client Consent Form for Observations
- K. E&T Provider Interview Protocol
- L. Administrative Data Submission Instructions and Variable List
  - M.1. FTP Site Instructions for Submitting Administrative Data
  - M.2. Email to States with FTP Password
- N.1. Federal Register Notice Comment 1
- N.2. Federal Register Notice Comment 2
- O. FNS Response to Federal Register Comment 1
  - P.1. National Agricultural Statistics Service Comments
  - P.2. FNS Responses to NASS Comments
- Q. Insight Policy Research Confidentiality Pledge
- R. Pretest Methods and Summary of Findings
- S. Total Public Burden Hours and Respondent Costs: Excel

## Part A. Justification

---

### A.1 Circumstances That Make Data Collection Necessary

---

**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

This is a new information collection request. The Food and Nutrition Act of 2008, as amended through P.L. 113-128, enacted July 22, 2014 [7 U.S.C. 2026], provides the legislative authority for the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to administer the Supplemental Nutrition Assistance Program (SNAP). Section 17 of the Food and Nutrition Act of 2008 provides authority to FNS to conduct research to help improve the administration and effectiveness of SNAP (see appendix A- Legal Authority Statutes and Regulations).

In addition to nutrition assistance, SNAP provides employment and training (E&T) services to select participants. The aim of these services is to help improve the economic self-sufficiency of SNAP participants and reduce their need for SNAP benefits. Whereas SNAP is administered at the State level, E&T services are often provided by entities other than the State SNAP office, including community-based organizations, other government entities, and community colleges.

States have the option to offer either a mandatory or a voluntary E&T program. Currently, 17 out of 53 State agencies<sup>1</sup> offer mandatory SNAP E&T programs. In these States, either all nonexempt participants or a select subset of participants may be required to take part in SNAP E&T activities, and failing to comply with E&T program requirements can result in sanctions and a loss of SNAP eligibility. Though current data exist on the characteristics of all SNAP E&T participants, there is little information regarding the program features and administrative practices of mandatory SNAP E&T programs. In particular, little is known about how those features and practices may affect E&T participation, sanctions, and participant outcomes. Therefore, FNS is requesting Office of Management and Budget (OMB) approval to collect information from a sample of participating State SNAP offices, local SNAP offices, and SNAP E&T providers. The study will profile mandatory SNAP E&T programs in six States via site visits. The study team

---

<sup>1</sup> SNAP State agencies include all 50 States, the District of Columbia, Guam, and the Virgin Islands.

1.

will interview staff at the State SNAP office (appendix E – State SNAP Director and E&T Director Interview Protocol), two local SNAP offices (appendices F and G- Local SNAP Officer Director Interview Protocol and Local SNAP Office Eligibility Worker Interview Protocol), and three SNAP E&T providers (appendix K – E&T Provider Protocol) in each of the six States. In conjunction with the site visits, the study will include collection and analysis of extant administrative data (OMB Control no. 0584-0064, expiration 7/31/2021; list of variables in appendix L.)

## **A.2 Purpose and Use of the Information**

---

**Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

### ***Purpose of Information Collection***

The information will be used to provide FNS with a better understanding of the program features and administrative practices of mandatory State E&T programs and the effect of those features and practices on E&T participation, sanctions, and outcomes for mandatory E&T participants. In particular, it will help FNS better understand how well mandatory E&T programs help SNAP participants move toward economic self-sufficiency and why many mandatory E&T participants are sanctioned, with particular attention to potential drop-off points, such as initial referral, intake, and orientation.

### ***Study Objectives***

The specific research objectives of this study as defined by FNS can be found in Appendix B.1 (Study Objectives Response to Supporting Statement Question 2), and a table showing the research objectives by data source can be found in Appendix B.2 (Research Objectives and Questions by Data Source).

### ***Overview of Information To Be Collected***

To meet these study objectives, FNS will gather data through (1) site visits to six States operating mandatory E&T programs, and (2) collection of SNAP administrative data (OMB Control no. 0584-0064, expiration 7/31/2021). The site visits will include a process-mapping exercise (appendix H – Process Mapping Protocol), observations (appendix I – Observation Checklist), and semistructured interviews with staff at the State SNAP office (appendix E – State SNAP Director and E&T Director Interview Protocol), two

1.

local SNAP offices (appendices F – Local SNAP Office Director Interview Protocol, G – Local SNAP Office Eligibility Worker Interview Protocol, and I – Observation Checklist), and three local E&T providers (appendix K – E&T Provider Interview Protocol). The administrative data (OMB Control no. 0584-0064, expiration 7/31/2021) will be collected from State SNAP agencies and E&T providers (appendix L- Administrative Data Submission Instructions and Variable List). Below, we describe the purpose of each data collection component, followed by a description of the data collection process.

1. **Site Visits to Six Mandatory SNAP E&T States.** The study team will conduct site visits with six mandatory SNAP E&T States, beginning approximately 4 weeks after receiving OMB clearance. The States will be chosen to reflect variation across 14 selection criteria, including variation in the number of participants served through the SNAP E&T programs, SNAP E&T policy options, and geographic location. The site visits will include interviews with (1) State SNAP office staff, (2) local SNAP office staff, and (3) SNAP E&T provider staff, a process mapping exercise at the local SNAP office, and observations at the local SNAP offices and E&T provider locations.

- ▶ **State SNAP office staff.** Interviews with State SNAP office staff will provide high-level information on the reasons the States instituted mandatory programs, overall State policies, resources, and available E&T outcome measures the State collects to help address each of the three study objectives.
- ▶ **Local SNAP office staff.** Interviews with two local SNAP offices in each State will provide detailed understanding of the mandatory E&T process and staff’s perspectives on the effects of different administrative practices on participation and sanctions. During the local office visit, the site team will facilitate a small group discussion with staff to map out the process through which mandatory E&T participants flow through the program to identify potential drop-off points from the process. The study team will also conduct an observation of the client intake process.
- ▶ **SNAP E&T provider staff.** The site visit team will conduct interviews with three SNAP E&T providers in each State to further understand client flow through the SNAP E&T process and available services. The study team will also conduct an observation of the client intake process. The study team assumes E&T providers will be a mix of State, business or other for-profit, and

1.

not-for-profit organizations. Selected E&T providers may include community colleges, Workforce Innovation and Opportunity Act (WIOA) agencies, for-profit and not-for-profit vocational and postsecondary training providers, and community- or faith-based programs, in addition to State E&T providers.

2. **Administrative Data Collection.** The study team will collect extant administrative data from SNAP case records and E&T providers. The study team will request the data within a week of OMB clearance. These data will be used to conduct a quantitative analysis to examine the characteristics of mandatory E&T participants in each State and to assess the E&T services, sanctions, case closures, and other outcomes associated with their E&T participation. To the extent the data allow, the analysis will also measure the relationship between specific mandatory E&T practices and outcomes, such as E&T participation, sanctions, case closures, and, if possible, employment.

The data collection activities for this study will be conducted between March and June 2019.

### ***Data Collection Process***

An advance letter from FNS will be sent to State SNAP directors via email to describe the study and request their participation (appendix C.1 – Recruitment Email from FNS to States). The study director will then follow up with an email to schedule a call with the State SNAP director to discuss the study (appendix C.2 – Follow Up Email from Study Director to States to Schedule Call). This email will also include a description of the study (appendix D – Study Overview and Frequently Asked Questions). The objective of each call will be to describe the study’s purpose and data collection activities, answer questions, and assess the State’s capacity and willingness to participate. Once the State agrees to participate, the study team will schedule the site visit and interviews.

1. **Site Visits to Mandatory SNAP E&T States.** The study team will conduct site visits to six States that offer mandatory SNAP E&T programs. In each State the study team will meet with the following:
- ▶ **State SNAP office staff.** The study team will conduct a 1-hour-long in-person interview with the State SNAP director and E&T program director in each of six States (for a total of 12 interviews) (see appendix E – State SNAP Director and E&T Director Interview Protocols). The directors will provide background information on the administration of the State’s mandatory SNAP E&T

1.

program. The interviews will also cover topics addressing the State's capacity to meet E&T program goals, program outcomes, and program challenges.

- ▶ **Local SNAP office staff.** The study team will conduct in-person interviews with staff at two local SNAP offices per State (for a total of 12 local offices). The study team will select one rural office and one urban office per State.
  - **Local office director interview.** The study team will interview the director of each local office in an hour-long interview (see appendix F- Local SNAP Office Director Interview Protocol). Interviews with local office directors will increase understanding of the State's screening, intake, and referral processes and drop-off points; procedures for reviewing noncompliant cases and issuing sanctions; staff training exercises; and capacity.
  - **Local office staff interviews.** The study team will also conduct in-person interviews with two additional staff in each local office (see appendix G – Local SNAP Office Eligibility Worker Interview Protocol). Interviews with local office staff will increase understanding of the State's screening, intake, and referral processes and any drop-off points; procedures for reviewing noncompliant cases and issuing sanctions; staff training exercises; and capacity.
  - **Observations.** The study team will also observe intake or eligibility workers in each local office as they conduct screening, client intake, orientation, and compliance determinations and/or issue notices of noncompliance or sanctions (see appendix I- Observation Checklist). These “real-world” observations will follow the guidelines of a standardized observation tool and will enrich and provide context for the interview findings.
  - **Process-mapping exercise.** The study team will also facilitate a small group discussion with up to five staff members, including eligibility workers, intake workers, and E&T staff, to complete a process-mapping exercise (see appendix H – Process Mapping Protocol). This exercise will help identify each step in the client pathway (including screening, intake, referrals, and issuance of notices) and dropoff points in the process that may lead to sanctions.
- ▶ **SNAP E&T provider staff.** The study team will conduct in-person interviews with staff at three E&T providers per State (for a total of 18 E&T providers) (see appendix K – E&T Provider Interview Protocol). Providers will be selected in both rural and urban areas and to ensure variety across

1.

provider types (e.g., community-based organizations, community colleges). In each State, the three E&T providers include one State provider, one business or other for-profit provider, and one not-for-profit provider.

The E&T provider staff will include the director at the provider location and two additional staff among case managers, career advisors, and administrative staff who provide data to the SNAP office. These interviews will collect additional details about the client flow and intensity of available services and provide insight into the local E&T population, the E&T services offered to them, the degree to which those services are aligned with participant needs and job market conditions, and participants' challenges in understanding E&T requirements.

- **Observations.** The study team will also observe key steps of the SNAP E&T process in each of the three E&T providers per State to further understand client flow through the SNAP E&T process and available services (see appendix I – Observation Checklist).

2. **Administrative Data Collection.** The study team will send the study description (appendix D- Study Overview and Frequently Asked Questions) and the administrative data submission instructions and variable list (appendix L – Administrative Data Submission Instructions and Variable List) to SNAP database administrators, followed by a call to discuss the data request, assess which data elements can be provided, and answer questions. The study team will collect the SNAP administrative data from each of the six States and from one provider in each of the six States. These caseload data include descriptive information on mandatory E&T participants, exemption status, whether and how long they were sanctioned, SNAP benefits, and case closures. The team will also collect data on E&T services received and whether assigned services were completed. These data will be collected from existing State caseload eligibility systems and E&T provider systems.

The administrative data will be used to conduct a descriptive analysis of mandatory E&T participants and to assess the E&T services, sanctions, case closures, and other outcome measures associated with E&T programs across the six study States. The study team will first calculate descriptive statistics for each of the six study states to examine the number and circumstances of mandatory E&T participants including the monthly average number of participants overall and as a percentage of total SNAP participants, the

1.

demographic characteristics of mandatory E&T participants in each State, and the percentage that have been sanctioned. The team will also produce statistics to examine E&T participation rates, sanction rates, and case closure rates among E&T participants, length of sanctions, and the percentage of sanctioned individuals who return to SNAP. To the extent that data on employment and earnings outcomes are available, the team will also tabulate the percentage of mandatory E&T participants who obtained employment and their median earnings after completing E&T components, and assess the relationship between administrative practices and demographic characteristics and employment and earnings outcomes.

The contractor pretested the site visit protocols and administrative data submission instructions and variable list in one State (see appendix R for results of the pretests).

### ***Frequency of Information Collection***

FNS will conduct each data collection only once for each component of the study as described above.

### ***Information Sharing With Other Organizations***

FNS plans to post the final report with detailed findings in aggregate form on the FNS intranet. FNS may share data files, which will not include any information that would compromise participant privacy, with other entities as requested.

### **A.3 Use of Information Technology and Burden Reduction**

**Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

This study strives to comply with the E-Government Act of 2002 (Public Law 107-347, 44 U.S.C. Ch 36). We describe the extent to which the collection of information in this study involves electronic techniques and other considerations to reduce burden for each of the key data collection components.

- ▶ **Administrative Data.** The study will collect the submissions of SNAP administrative and E&T outcome data electronically at <http://snap.insightpolicyresearch.com> using Insight's secure file

1.

transfer protocol (FTP) site exchange (see appendix M.1 - FTP Site Instructions for Submitting Administrative Data and appendix M.2 - Email to States with FTP password). Each data administrator will submit a complete file with 29 months of administrative data on one occasion. Data will not be submitted on a monthly basis.

- ▶ **Site Visits.** Data collected in the site visits will not employ information technology. Instead, data will be collected in person by trained and experienced researchers conducting interviews using semistructured protocols. Interviews will be recorded with the permission of respondents, using digital voice recorders, to aid in note-taking.

Therefore, approximately 45 percent of the entire information collection request will be transmitted electronically at the website identified above.

#### **A.4 Efforts To Identify Duplication and Use of Similar Information**

---

**Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.**

There is no similar information collection. Every effort has been made to avoid duplication, including identifying which E&T variables States are already collecting in order to minimize States' time burden of cleaning and submitting data files to the study team. To make use of data already provided by States, the contractor will obtain and review preliminary information on the E&T procedures and processes in each State and existing outcome measures. However, a large part of the study depends on obtaining information through in-person interviews, observations, and process-mapping exercises in the six States to develop a detailed understanding of the E&T process and staff's perspectives on the effects of different practices on participation and sanctions. Beginning January 1, 2018, States are required to submit aggregate data on a limited number of E&T outcome measures including the number of participants and former participants in unsubsidized employment and their median earnings after completing E&T.<sup>2</sup> Although the study team will examine these reports, they are not sufficient to meet the needs of this study. First, they are aggregate measures, while individual-level outcome data are needed to assess the

---

<sup>2</sup> See memo from FNS Office of Employment and Training describing the E&T outcome data States must report annually beginning January 1, 2018, found here: <https://fns-prod.azureedge.net/sites/default/files/snap/Implementation-Memo-SNAP-ET-Program-Monitoring-Oversight-Reporting-Measures.pdf>.

1.

relationship between practices such as sanctions or types of E&T components and employment outcomes. Second, these outcome reports provide only a limited amount of data and do not include information such as whether an individual was sanctioned, the length of the sanction, SNAP participation, length of E&T component, and other measures needed to address the study goals. This new data collection will provide the data needed to fully understand how mandatory E&T programs affect E&T participation, sanctions, and participant outcomes.

### **A.5 Impacts on Small Businesses or Other Small Entities**

---

**If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

There could be some small entities involved in this data collection. Some of the E&T providers could be small businesses or not-for-profit organizations that are integral to providing E&T services within States. As such, the study must include these organizations. The E&T provider interview protocol (appendix K - E&T Provider Interview Protocol) has been designed to impose minimal burden on participating businesses and organizations. The information requested during interviews has been held to a minimum required for the intended use. Therefore, FNS estimates that of the businesses interviewed for this study, approximately 25 percent are considered small businesses.

### **A.6 Consequences of Collecting the Information Less Frequently**

---

**Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

This is a one-time data collection request. If this information collection is not conducted, USDA FNS will have limited understanding of the screening and enrollment processes for mandatory E&T services, including drop-off points and reasons for participant sanctions, and the workforce outcomes of such programs. With a greater focus on SNAP E&T programs nationwide, it is critical for FNS to have a detailed and granular understanding of how specific E&T features and administrative practices affect a participant's likelihood of participating, being sanctioned, and gaining skills toward employment and economic self-sufficiency.

1.

## A.7 Special Circumstances Relating to the Guideline of 5 CFR § 1320.5

---

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- ▶ Requiring respondents to report information to the agency more often than quarterly
- ▶ Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it
- ▶ Requiring respondents to submit more than an original and two copies of any document
- ▶ Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than 3 years
- ▶ In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study
- ▶ Requiring the use of a statistical data classification that has not been reviewed and approved by OMB
- ▶ That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use
- ▶ Requiring respondents to submit proprietary trade secret or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances that would cause USDA FNS to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

## A.8 Comments in Response to the Federal Register Notice and Efforts To Consult Outside Agency

---

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

### *Federal Register Notice and Comments*

1.

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, Monday, July 9, 2018 at 83 FR 31716, volume 83, number 131, pages 31716 - 31722. The period for comments closed September 7, 2018. FNS received two comments for this proposed information collection, one of which was relevant. The comments appear in appendices N.1 and N.2, and FNS response to the first comment appears in appendix O. FNS also received a phone call on August 7, 2018 in response to the Federal Register notice. The caller was from the Academy of Nutrition and Dietetics and requested copies of the draft interview protocols for the study. FNS emailed the draft instruments to the caller on August 9 and did not receive any additional feedback.

### ***Consultations Outside the Agency***

FNS consulted with Linette Lanclos, Mathematical Statistician, from the National Agricultural Statistics Service (NASS) of USDA, who reviewed the study methodology and statistical procedures. The review from NASS and our response to NASS's comments appear in appendices P.1 and P.2, respectively.

See table A.8.1 for other individuals consulted outside the agency.

**Table A.8.1: Individuals Consulted Outside the Agency**

<b>Name</b>	<b>Title</b>	<b>Organizational Affiliation</b>	<b>Phone Number</b>
Tikki Brown	Director – Economic Opportunity and Nutrition Assistance	Minnesota Department of Health and Human Services	651.431.3822
Jennifer Frey	Supervisor – Quality Improvement Team	Hennepin County EWS	612.462.0567
Kari Berg	Work Services Program Manager	Hennepin County Health and Human Services	612.558.9459
Daniel Warner	Executive Director	Rural Minnesota CEP	218.847.0717

After these consultations, approximately 20 percent of the questions in the SNAP Director and E&T Director Interview protocol were deleted to ensure that the interviews were reduced from 75 minutes to an average of 60 minutes.

## **A.9 Explanation of Any Payment or Gift to Respondents**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payments or gifts will be provided to respondents as part of this study.

1.

## **A.10 Assurance of Confidentiality Provided to Respondents**

---

### **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

In accordance with the Privacy Act of 1974, the study team will protect the privacy of all information collected for the study and will use it for research purposes only. No information that identifies any study participant will be released. Furthermore, personally identifiable data collected from the extant administrative data will not be entered into the analysis file, and data records will contain a numeric identifier only. The terms and protections provided to respondents are discussed in two system of record notices: (1) FNS-8 USDA FNS Studies and Reports published in the *Federal Register* on April 25, 1991, Volume 56, page 19078; and (2) USDA/FNS-10 Persons Doing Business with the Food and Nutrition Service, published in the *Federal Register* on March 31, 2000, Volume 65, pages 17251–17252. Study respondents will be notified the information they provide will not be released in a form that identifies them, except as otherwise required by law. No identifying information will be attached to any reports or data supplied to USDA or any other researchers. The identities of State SNAP office, local SNAP office, and E&T provider staff will not be disclosed. Additionally, as part of the local SNAP office observation, all clients taking part in the observation will be asked for their verbal consent to participate in the observation and informed that participation will no way affect their benefits, nor will any information provided be released, except as otherwise required by law (see Appendix J – Client Consent Form for Observations).

State SNAP offices and E&T providers submit data files using a secure FTP site, which prevents any unauthorized access to the information contained in the data submissions.

For reporting of results, data will be presented only in aggregate form so that individuals and institutions will not be identified. A statement to this effect will be included with all requests for data. All members of the study team with access to the data will be trained on the importance of privacy and data security. All data will be kept in secured locations. Identifiers will be destroyed as soon as they are no longer required.

FNS staff will never handle or see any of the personal data collected, and the contractors' systems do not tie into any of FNS's data management and analysis systems. The contractors' data creation and

1.

processing system was not created for this contract agreement. FNS does not have any control over the contractors' systems.

FNS's contractors will employ the following safeguards to protect privacy during the study:

- ▶ Computer data files will be protected with passwords, and access will be limited to specific users on the research team.
- ▶ Employees must notify their supervisor, the project director, and the contractor's security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner.

The Confidentiality Pledge in which employees of the contractor and subcontractor provide assurances to the above safeguards appears in appendix Q. Insight Policy Confidentiality Pledge).

### **A.11 Justification for Sensitive Questions**

---

**Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature included in this information collection request.

### **A.12 Estimates of Hour Burden, Including Annualized Hourly Costs**

---

**Provide estimates of the hour burden of the collection of information. The statement should:**

- ▶ **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour-burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

This new information collection has a total of 207 respondents (198 from respondents and 9 from nonrespondents). The affected public in this study is 119 State and local government staff, 29 business or other for-profit staff, 29 not-for-profit staff, and 30 individuals.

1.

The annual total estimated burden (hours) across all data collection components is 393.05 hours (392.6 hours for respondents plus 0.45 hours for nonrespondents). Time per response ranges from 33 minutes for reading advance materials and preparation to 4.7 hours for providing administrative data files. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping. Table A.12.1 and appendix S, Total Public Burden Hours and Respondent Costs: Excel provide more detailed information about the burden and annualized costs to respondents for this collection.

► **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. The total annualized cost to respondents for the hour burdens for collections of information is \$12,278 (\$8,938 for State and local government staff, \$1,528 for business or other for-profit staff, \$1,595 for not-for-profit staff, and \$218 for individuals). This total annualized cost is calculated as the sum of the annualized costs by respondent category. For each respondent category, the annualized cost is the product of burden hours (including pretest burden and nonresponse burden) and an assumed wage rate for a corresponding occupation.

Wage rates were based on the most recently available national occupational employment and wage data from the Bureau of Labor Statistics.<sup>3</sup> Using this website, the wage rates of State SNAP director and E&T director respondents (\$57.65) are the average hourly earnings of workers in management occupations (occupation code 11-0000). The wage rates of State and E&T provider database administrators (\$42.81) are the average hourly earnings of workers in database administration occupations (occupation code 15-1141). The wage rates of E&T provider staff (\$33.31) are the average hourly earnings of workers in social and community service management occupations (occupation code 11-9151). The wage rates of local SNAP office staff (\$21.53) are the average hourly earnings of workers in community and social service specialist occupations (occupation code 21-10099). The wage rate of individuals is the federal minimum wage, \$7.25 an hour.<sup>4</sup>

<sup>3</sup> Wage rates are based on the Bureau of Labor Statistics, May 2017 National Occupational Employment and Wage Estimates United States, retrieved from [https://www.bls.gov/oes/2017/may/oes\\_nat.htm#29-0000](https://www.bls.gov/oes/2017/may/oes_nat.htm#29-0000)

<sup>4</sup> Federal minimum wage information is from the Department of Labor, Wage and Hour Division, retrieved from <https://www.dol.gov/WHD/minimumwage.htm>

Table A.12.1. Total Public Burden Hours and Respondent Costs

Respondent Category	Type of respondents	Instruments and Activities	Appendix	Sample Size	Responsive					Non-Responsive					Grand Total Annual Burden Estimate (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden	
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)				
<b>State, Local, and Tribal government</b>																		
State Government	State SNAP Staff	Pre-test	R	2.0	2.0	1.0	2.0	1.3	2.5	0.0	0.0	0.0	0.0	0.0	2.50	\$57.65	\$144	
	State SNAP Staff	Advance materials and preparation, including all conference and scheduling calls	C.1; C.2	6.0	6.0	1.0	6.0	1.2	7.4	0.0	0.0	0.0	0.0	0.0	7.40	\$57.65	\$427	
	State SNAP Staff	In-person semi-structured interviews with SNAP Directors and E&T Managers	E	12.0	12.0	1.0	12.0	1.0	12.0	0.0	0.0	0.0	0.0	0.0	12.00	\$57.65	\$692	
	<b>Subtotal for State SNAP Staff</b>				12.0	12.0	1.7	20.0	1.1	21.9	0.0	0.0	0.0	0.0	0.0	21.90	-	\$1,263
	State Database administrator	Pre-test	R	1.0	1.0	1.0	1.0	1.0	1.0	0.0	0.0	0.0	0.0	0.0	1.00	\$42.81	\$43	
	State Database administrator	Advance materials and preparation, including consultative data call	L	6.0	6.0	1.0	6.0	3.0	18.0	0.0	0.0	0.0	0.0	0.0	18.00	\$42.81	\$771	
	State Database administrator	Submit test file	L	6.0	6.0	1.0	6.0	4.0	24.0	0.0	0.0	0.0	0.0	0.0	24.00	\$42.81	\$1,027	
	State Database Administrator	Submit administrative data file	L	6.0	6.0	1.0	6.0	4.7	28.2	0.0	0.0	0.0	0.0	0.0	28.20	\$42.81	\$1,207	
	<b>Subtotal for State Database Administrator</b>				6.0	6.0	3.2	19.0	3.7	71.2	0.0	0.0	0.0	0.0	0.0	71.20	-	\$3,048
	State E&T Provider	Advance materials and preparation	NA	9.0	6.0	1.0	6.0	0.55	3.3	3.0	1.0	3.0	0.05	0.2	3.45	\$33.31	\$115	
State E&T Provider	In-person semi-structured interviews with 3 E&T provider staff in 6 States	K	18.0	18.0	1.0	18.0	1.0	18.0	0.0	0.0	0.0	0.0	0.0	18.00	\$33.31	\$600		
State E&T Provider	Observations of Intake Process	I; J	6.0	6.0	1.0	6.0	1.0	6.0	0.0	0.0	0.0	0.0	0.0	6.00	\$33.31	\$200		
State E&T Provider Database administrator	Advance materials and preparation	L	2.0	2.0	1.0	2.0	2.0	4.0	0.0	0.0	0.0	0.0	0.0	4.00	\$42.81	\$171		
State Government (continued)	State E&T Provider Database administrator	Submit administrative data file	L	2.0	2.0	1.0	2.0	4.5	9.0	0.0	0.0	0.0	0.0	9.00	\$42.81	\$385		
<b>Subtotal for State E&amp;T Provider</b>				29.0	26.0	1.3	34.0	1.2	40.3	3.0	1.0	3.0	0.05	0.2	40.45	-	\$1,471	

2.

Respondent Category	Type of respondents	Instruments and Activities	Appendix	Sample Size	Responsive					Non-Responsive					Grand Total Annual Burden Estimate (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)			
Local Government	Local SNAP Office Staff	Pre-test	R	2.0	2.0	1.0	2.0	1.00	2.0	0.0	0.0	0.0	0.0	0.0	2.00	\$21.53	\$43
	Local SNAP Office Staff	Advance materials and preparation	NA	12.0	12.0	1.0	12.0	0.55	6.6	0.0	0.0	0.0	0.0	0.0	6.60	\$21.53	\$142
	Local SNAP Office staff	In-person semi-structured interviews with 3 staff in 2 sites over 6 States	F; G	36.0	36.0	1.0	36.0	1.00	36.0	0.0	0.0	0.0	0.0	0.0	36.00	\$21.53	\$775
	Local SNAP Office staff	Group mapping exercise with 5 local staff in 2 sites over 6 States	H	60.0	60.0	1.0	60.0	1.50	90.0	0.0	0.0	0.0	0.0	0.0	90.00	\$21.53	\$1,938
	Local SNAP Office staff	Observations of Intake Process	I; J	12.0	12.0	1.0	12.0	1.00	12.0	0.0	0.0	0.0	0.0	0.0	12.00	\$21.53	\$258
<b>Subtotal for Local office</b>				72.0	72.0	1.7	122.0	1.2	146.6	0.0	0.0	0.0	0.0	0.0	146.60	-	\$3,156
<b>State/Local/Tribal Government Sub-Total</b>				119.0	116.0	1.7	195.0	1.4	280.0	3.0	1.0	3.0	0.05	0.2	280.15	-	\$8,938
<b>Business or Other For Profit</b>																	
Business or Other For Profit	E&T Provider	Advance materials and preparation	NA	9.0	6.0	1.0	6.0	0.55	3.3	3.0	1.0	3.0	0.05	0.2	3.45	\$33.31	\$115
	E&T Provider	In-person semi-structured interviews with 3 E&T provider staff in 6 states	K	18.0	18.0	1.0	18.0	1.0	18.0	0.0	0.0	0.0	0.0	0.0	18.00	\$33.31	\$600
	Business E&T Provider Database administrator	Advance materials and preparation	L	2.0	2.0	1.0	2.0	2.0	4.0	0.0	0.0	0.0	0.0	0.0	4.00	\$42.81	\$171
	Business E&T Provider Database administrator	Submit administrative data file	L	2.0	2.0	1.0	2.0	4.5	9.0	0.0	0.0	0.0	0.0	0.0	9.00	\$42.81	\$385
	Business E&T Provider Database administrator	Observations of Intake Process	I; J	6.0	6.0	1.0	6.0	1	6.0	0.0	0.0	0.0	0.0	0.0	6.00	\$42.81	\$257
<b>Business or Other For Profit Sub-Total</b>				29.0	26.0	1.3	34.0	1.2	40.3	3.0	1.0	3.0	0.05	0.2	40.45	-	\$1,528
<b>Not for Profit</b>																	
Not For Profit	E&T Provider	Pretest	R	2.0	2.0	1.0	2.0	1.00	2.0	0.0	0.0	0.0	0.00	0.0	2.00	\$33.31	\$67
	E&T Provider	Advance materials and preparation	NA	9.0	6.0	1.0	6.0	0.55	3.3	3.0	1.0	3.0	0.05	0.2	3.45	\$33.31	\$115

2.

Respondent Category	Type of respondents	Instruments and Activities	Appendix	Sample Size	Responsive					Non-Responsive					Grand Total Annual Burden Estimate (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
					Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)			
	E&T Provider	In-person semi-structured interviews with 3 E&T provider staff in 6 states	K	18.0	18.0	1.0	18.0	1.0	18.0	0.0	0.0	0.0	0.0	0.0	18.00	\$33.31	\$600
	Not for Profit E&T Provider Database administrator	Advance materials and preparation	L	2.0	2.0	1.0	2.0	2.0	4.0	0.0	0.0	0.0	0.0	0.0	4.00	\$42.81	\$171
	Not for Profit E&T Provider Database administrator	Submit administrative data file	L	2.0	2.0	1.0	2.0	4.5	9.0	0.0	0.0	0.0	0.0	0.0	9.00	\$42.81	\$385
	Not for Profit E&T Provider Database administrator	Observations of Intake Process	I;J	6.0	6.0	1.0	6.0	1	6.0	0.0	0.0	0.0	0.0	0.0	6.00	\$42.81	\$257
<b>Not For Profit Sub-Total</b>				29.0	26.0	1.4	36.0	1.2	42.3	3.0	1.0	3.0	0.05	0.2	42.45	-	\$1,595
<b>Individuals</b>																	
Individuals	SNAP participants	Observations of Intake Process	I;J	30.0	30.0	1.0	30.0	1.0	30.0	0.0	0.0	0.0	0.00	0.0	30.00	\$7.25	\$218
<b>SNAP Participant Sub-Total</b>				30.0	30.0	1.0	30.0	1.0	30.0	0.0	0.0	0.0	0.00	0.0	30.00	-	\$218
<b>TOTAL</b>				207.0	198.0	1.5	295.0	1.3	392.6	9.0	1.0	9.0	0.05	0.45	393.05	-	\$12,278

\*\* Source: Bureau of Labor Statistics; May 2017 National Occupational Employment and Wage Estimates; [https://www.bls.gov/oes/2017/may/oes\\_nat.htm](https://www.bls.gov/oes/2017/may/oes_nat.htm)

US Department of Labor, Wage and Hour Division; Minimum Wage; <https://www.dol.gov/WHD/minimumwage.htm>

State SNAP staff: average hourly earnings of workers in management occupations (11-0000): \$57.65

State and E&T database administrators: average hourly earnings of database administrators (15-1141): \$42.81

E&T provider staff: average hourly earnings of social and community service managers (11-9151): \$33.31

Local SNAP office staff: average hourly earnings of community and social service specialists (21-10099): \$21.53

Individuals/SNAP Participants: Federal minimum wage rate (\$7.25)

### **A.13 Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

---

**Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: a) a total capital and startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.**

No capital or startup or ongoing operational and maintenance costs are associated with this information collection.

### **A.14 Annualized Cost to Federal Government**

---

**Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The total average annual cost to the Federal Government is \$369,902.92. The contract cost to the Federal Government is a fixed price award, valued at \$844,518.00. This total includes costs associated with the study design, instrument development, recruitment and selection of States, data collection, data analysis, reporting, and presentation/publication of the results. Of the total cost (\$844,518.00), approximately \$361,915 will be used for data collection and analysis. This includes \$31,092 for data collector training; \$82,706 for collection, cleaning, and analysis of administrative and E&T data; \$148,868 for site visit data collection and reporting to FNS; and \$99,249 for analysis of site visit data. Travel costs will not exceed \$28,422.

This information collection also assumes the cost of FNS employees, which is estimated to be \$80,239.30. This cost was calculated as follows:

- ▶ 520 hours per year of FNS Federal employee time for a Social Science Policy Analyst, involved in project oversight, with an estimated GS-12, step 1 salary level at \$39.07 per hour for a cost of \$20,316.40. The total cost for the FNS Social Science Policy Analyst over the 2.5-year study period is \$50,791.00 based on a combined total of 1,300 hours.

3.

- ▶ 60 hours per year of FNS Federal employee time for a Program Analyst, involved in providing expert subject matter guidance to the project, with an estimated GS-13, step 10 salary level at \$60.40 per hour for a cost of \$3,624.00. The total cost for the FNS Program Analyst over the 2.5-year study period is \$9,060.00, based on a combined total of 150 hours.
- ▶ 120 hours per year of FNS Federal employee time for a Branch Chief, involved in project oversight with the study, with an estimated GS-14, Step 5 salary level at \$62.23 per hour for a cost of \$7,467.60. The total cost for the FNS Branch Chief over the 2.5-year study period is \$18,669.00, based on a combined total of 300 hours.
- ▶ 2 hours per year of FNS Federal employee time for 6 Regional Office SNAP Directors (12 hours per year), involved in recruiting States for the study, with an estimated at GS-13, Step 8 salary level at \$57.31 per for a cost of \$687.72. The total cost for the Regional Office SNAP Directors over the 2.5-year study period is \$1,719.30, based on a combined total of 30 hours.

Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2018 for the Washington, DC, locality.<sup>5</sup>

The total cost (contract + FNS costs) is \$924,757.30, for an average annual cost of \$369,902.92.

### **A.15 Explanation for Program Changes or Adjustments**

**Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a new information collection that will add 393.05 burden hours (392.6 response hours plus 0.45 nonresponse hours) and 304 annual responses (295 responses plus 9 nonresponses) to the OMB information collection inventory.

### **A.16 Plans for Tabulation and Publication and Project Time Schedule**

**For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The schedule for data collection, tabulation, and publication appears in table A.16.1.

<sup>5</sup> Federal employee hourly wage rates are based on the General Schedule of the Office of Personnel Management for 2018 for the Washington-Baltimore-Arlington locality retrieved from [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/DCB_h.pdf)

3.

**Table A.16.1. Project Time Schedule**

<b>Activity</b>	<b>Activity Period</b>	<b>Weeks After OMB Clearance<sup>6</sup></b>
Make preliminary selection of mandatory E&T States	November 2017–December 2017	NA
Develop and test data collection instruments	December 2017–May 2018	NA
Conduct data collection	March 2019–June 2019	3-16 weeks
Conduct data analysis and tabulations	June 2019–September 2019	17-29 weeks
Prepare draft and final reports for FNS	August 2019–March 2020	25-55 weeks
Conduct briefing at FNS	February 2020	52 weeks
Prepare data files and documentation	January 2020–March 2020	47-55 weeks

### **A.17 Reason(s) Display of OMB Expiration Date Is Inappropriate**

**If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

All data collection instruments will display the OMB approval number and expiration date.

### **A.18 Exceptions to Certification for Paperwork Reduction Act Submissions**

**Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”**

No exceptions are necessary for this information collection. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

## **References**

DOL BLS (Bureau of Labor Statistics). (2017, May). Occupational employment statistics: National occupational employment and wage estimates [Dataset]. Retrieved from [http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)

DOL WHD (Wage and Hour Division). Minimum Wage. Retrieved from <https://www.dol.gov/WHD/minimumwage.htm>

<sup>6</sup> Assumes OMB clearance will be received February 8, 2019.