

**ENHANCING FOOD STAMP CERTIFICATION:
FOOD STAMP MODERNIZATION EFFORTS**

Supporting Statement for Request for Clearance

November 13, 2007

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A. JUSTIFICATION

The following supporting statement provides detailed information on the proposed information collection activities for a three-year study entitled, “Enhancing Food Stamp Certification: Food Stamp Modernization Efforts.” This study, led by the U.S. Department of Agriculture (USDA), Food and Nutrition Service (FNS), will be a one-time information collection to document and analyze Food Stamp Program (FSP) modernization efforts undertaken by states.

1. Circumstances that make the collection of information necessary

The Food Stamp Program provides low-income individuals and families with assistance to purchase eligible food items for home consumption through state-operated programs. Over the past decade, increased awareness of the importance of the FSP as a basic nutritional safety net, as well as a critical work support, has led to a variety of federal and state efforts to increase program access and participation. At the same time, states are focusing on ways to increase operational and administrative efficiency and program integrity. To meet these goals, states are making a variety of changes in their policy, procedural, and organizational approaches to food stamp application, case management, and recertification.

Congress has allocated funds for the purpose of evaluating and collecting data on the FSP as part of Section 17(a)(1) of the Food Stamp Act of 1977, as amended through P.L. 106-171, February 11, 2000. The authorizing legislation states that “The Secretary [USDA] may, by way of making contracts with or grants to public or private organizations or agencies, undertake research that will help improve the administration and effectiveness of the food stamp program in delivering nutrition-related benefits.”

In an effort to document, assess, and inform state modernization efforts, USDA’s Food and Nutrition Service, which administers the FSP, initiated a comprehensive study to: 1) develop a national inventory of FSP modernization efforts across states; 2) document key features and outcomes associated with food stamp modernization; 3) systematically describe and compare techniques states are using to modernize the FSP; and 4) identify promising practices. Study results will inform FNS policy discussions, provide technical and procedurally relevant information to states, and provide a comprehensive and centralized source of information for assessing ways to improve food stamp certification and responding efficiently to the variety of stakeholder queries received.

Specifically, the study will focus on four types of modernization to food stamp application, case management, and recertification: 1) policy changes; 2) organizational reengineering; 3) increased or enhanced use of technology; and 4) partnering arrangements with businesses and nonprofit organizations. This three-year study will examine the outcomes associated with program access and customer service, administrative costs, and program integrity.

To address these objectives, data will be obtained through two main collection methods: large scale surveys of state and local food stamp administrators and community partners; and case studies of a smaller set of states that have pursued different packages of modernization strategies. In addition, this study will utilize the information available in FNS' database on food stamp waivers. The survey will collect data to develop a national inventory of modernization efforts, conduct cross-state analyses, and select case study sites. The case studies, a more in-depth examination of 14 states, will include interviews with local and state-level staff, community organizations and for-profit contractors; and focus groups with food stamp participants, applicants, and eligible nonparticipants. The case studies will provide a rich source of qualitative data about FSP modernization activities from the perspective of workers, participants, and partner organizations that will complement the survey data. The case studies will incorporate extant data to describe FSP performance before and after the implementation of state modernization efforts with respect to application approval rates, participation rates, payment accuracy, administrative costs, and other outcomes that states may be tracking. (The instruments for these activities can be found in Appendices A-B.)

2. How, by whom, and for what purpose the information is to be used

This study presents an important opportunity for FNS to examine and promote successful modernization efforts by providing a comprehensive, national picture about modernization efforts, describing the perceived effect on program outcomes, sharing information to help avoid implementation pitfalls, and promoting promising practices to multiple stakeholders. The key audiences for the study's results—disseminated through a final report, briefing materials, and a public use database—are national and regional FNS officials, state and local food stamp officials, non-profit service providers, and advocates.

The key objectives of the study—to be met by collecting and analyzing data from states and local areas—are to:

1. Provide a national description and comparison of state efforts to modernize the FSP.
2. Describe the factors that drive states to modernize their food stamp services.
3. Describe and compare the policy changes pursued as part of food stamp modernization.
4. Identify the ways that states re-engineer administrative structure and organizational roles as part of food stamp modernization.
5. Describe and compare technology initiatives made to support food stamp modernization.
6. Describe and compare the non-profit community organizations that states partner with to support food stamp modernization.
7. To the extent possible, document the relationship among food stamp modernization initiatives, stakeholder satisfaction, and program outcomes.

A chart of the study's objectives and research questions is provided in Appendix C of this supporting statement. This chart lists the objectives with the accompanying research questions and the data sources that show how these questions will be addressed through the study methodology.

3. Use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology

Respondents will be able to choose whether to respond on-line to an electronic version of the survey or respond on a paper version to be returned by surface mail. Based on the research team's experience with web-only and mixed-mode surveys, along with USDA's and the U.S. Government Accountability Office's (GAO) experience administering surveys of state FSP directors,¹ it is expected that all of the respondents will have on-line access and Internet experience. Furthermore, we expect that nearly all of them will choose to respond to the on-line version of the survey.

The web-based versions of the surveys will be created in Ultimate Survey, a commercial software application for development and administration of on-line surveys. The advantage of the on-line survey is the automatic tabulation of responses that reduces both the hours of staff time needed for survey processing and the possibilities for introducing errors into the data. The automated skip patterns of the on-line survey also place less of a burden on the respondent than the customary "if-then go to" instructions of a mail questionnaire. The web and paper versions of the questionnaire will both be in modular formats that allow the primary respondent to pass sections or questions on to other staff members who may be better equipped to address particular topics.

It is expected that only a few respondents will select to use a paper version of the survey, and therefore, the surveys are designed for completion online. Accordingly, web features (auto-population of responses, for example) are used that are somewhat different from the paper version. Based on previous experience, the reduction in burden on respondents outweighs the possible mode bias. However, we will treat survey mode as paradata and check for any indication of bias.

¹ See Olander, Carol. 2007. "Nutrition Education in the Food Stamp Program: A National Description." Presentation, Office of Analysis, Nutrition, and Evaluation, Food and Nutrition Service. Washington, DC, February 21; U.S. Government Accountability Office. 2007. "Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices." *Report to the Chairman, Committee on Agriculture, Nutrition, and Forestry, U.S. Senate*, May. Washington, DC; and U.S. Government Accountability Office. 2004. "Farm Bill Options Ease Administrative Burdens but Opportunities Exist to Streamline Participant Reporting Rules among Programs." *Report to the Committee on Agriculture, Nutrition, and Forestry, U.S. Senate*, September.

4. Efforts to identify duplication

No systematic effort has been undertaken to catalogue, describe, compare, and assess the full range of modernization efforts that are being planned and implemented across all the states. The contractor for this study, the Urban Institute, conducted an in-depth literature review of existing studies and reports on food stamp modernization efforts. The findings show that a handful of states have taken the initiative to describe different aspects of their modernization initiatives.

One of these studies is the FNS' Case Study on Florida's Food Stamp Modernization Initiative. This project is in the final stages of data analysis and report writing (a draft report was submitted to FNS in February 2007). This report, which provides a detailed description of the modernization model in one state, will help to inform this study with respect to providing considerable background information on Florida as well as suggested methods for categorizing and analyzing information.

In addition, GAO recently completed a report to the U.S. Senate Chairman of the Committee on Agriculture, Nutrition, and Forestry, entitled "Food Stamp Program: Use of Alternative Methods to Apply for and Maintain Benefits Could Be Enhanced by Additional Evaluation and Information on Promising Practices." The GAO report, released in May 2007, details a subset of the alternative methods to apply for and maintain food stamp benefits such as use of call centers and on-line applications and recertifications. While the study collected data from 50 state food stamp administrators and visits to five states, the range of modernization strategies was more selective than the proposed study; outcome data were not included; and the analysis of trends and patterns was limited. In fact, GAO recommended that FNS both "disseminate and regularly update information on promising practices" and "include projects that would determine the effects of alternative methods."²

This study will address the first GAO recommendation by comprehensively documenting the modernization efforts across the 50 state programs (plus the District of Columbia) in each of the broad but well-defined categories of food stamp modernization and by measuring any changes in participation, administrative cost, and payment accuracy that occur with the introduction of program changes.³ Study results will be used to inform FNS and guide states as they look to develop or enhance modernization efforts. In addition, this study will create a national inventory of modernization efforts and a public use database for this information to be disseminated.

5. Minimizing impact on small business or other small entities

While the survey and case study respondents are mainly state and local government officials, some of the local partner respondents may be small businesses (for-profit service providers) and small entities (community-based and faith-based non-profit service providers). It

² See U.S. Government Accountability Office 2007, p. 36.

³ To address the second GAO recommendation, a series of experiments with random assignment to alternative program conditions would be required. Such a study exceeds the available resources.

is important to collect data from these respondents to get a complete picture of how services are delivered. We anticipate that only a very small portion of the 150 community representatives and contractors surveyed and 84 community representatives and contractors interviewed will be small entities. A shorter version of the survey (in Appendix A) and of the site visit discussion guide (in Appendix B) will be administered to respondents who are local partners in order to minimize their burden. The web versions of the surveys, including the one for the local partners, incorporate skip patterns, so the local partner respondents can move through the survey questions with efficiency, especially if they provide fewer services. The information requested in both the survey and the case study data collection efforts has been held to an absolute minimum required to answer the research questions and minimize the burden on the respondents.

6. Consequences if the collection is not conducted

While several states have documented their efforts to modernize their FSPs, no comprehensive cross-state documentation and analysis of these efforts are currently available. This study will provide a national inventory of modernization efforts in all states and analysis to identify the promising practices as well as challenges to implementing these efforts. Without this study, FNS and state food stamp agencies will have to rely on the information that is provided for individual modernization initiatives. Such information is not integrated, uniform, or timely – thus making access and application a challenge.

7. Special circumstances

This information collection has none of the following special circumstances that would require respondents to: report information more than quarterly; prepare a written response fewer than 30 days after receipt; submit more than an original and two copies of documents; and retain records for more than three years. In addition, this collection does not require the use of statistical data classification that has not been reviewed by OMB, or include a pledge of confidentiality that cannot be supported by law, disclosure and data security policies that are consistent with the pledge, and sharing of data with other agencies for compatible confidential use.

8. Consultation with persons outside the agency

A notice was published in the *Federal Register* (72 FR 32833) on June 14, 2007, to solicit comments on the FNS data collection prior to submission of this OMB clearance request. (A copy of this notice and any public comments are provided in Appendix D.)

One public comment was received in response to this notice. The commenter requested that his organization be included in the sample for the survey and be interviewed during the case study phase. While it is likely that this organization will be selected to complete the survey because of its work with the state FSP on issues related to program accessibility and operations, no change to the sampling strategy or the case study selection process will be made to include

specific organizations. Another suggestion by the commenter was that there should be some coordination between FNS's data collection effort and the organization's own surveys to avoid duplication. The organization will survey food stamp participants in one state, so there is little potential for duplication with this proposed national data collection effort that will survey administrators and service providers. Therefore, no formal coordination will occur, but the survey efforts will certainly be discussed with the organization should its state be selected for a case study. In addition, the commenter suggested that the study should examine the administrative costs of food stamp modernization efforts. While we will explore the subject of administrative costs with case study respondents, the survey does not address administrative costs as obtaining consistent information across the varied modernization initiatives would dramatically increase the burden on respondents. Finally, the commenter suggested that the study should conduct discussion groups with low-income individuals. This activity is currently planned during the study as described in this Supporting Statement.

While no formal advisory group of outside experts was convened, representatives of national organizations were interviewed about issues related to food stamp modernization efforts in the states. Their feedback was used to select and frame topics to address in the data collection. These organizations were:

- American Public Human Services Association, Larry Goolsby and Elaine Ryan
- National Governors Association Center for Best Practices, Susan Golonka and Courtney Smith
- National Conference of State Legislatures, Lee Posey and Anne Morse
- Center on Budget and Policy Priorities, Stacy Dean, Dottie Rosenbaum, and Colleen Pawling
- Food and Research Action Center, Ellen Vollinger
- Second Harvest, Doug O'Brien
- U.S. Government Accountability Office, Cathy Roark

No contact was made with outside consultants on the estimated burden of the case study instruments, nor on the design of the study. Survey instruments were reviewed by staff at the GAO, the Washington, DC Department of Human Services, and the California Association of Food Banks.

9. Payment or gift to respondents

Focus group participants will receive a small remuneration of \$20 plus a light meal or refreshments to increase the participation numbers. These focus groups will be comprised of food stamp participants, applicants, or eligible nonparticipants.

Incentives have been shown to be effective in increasing overall response rates in all modes of surveys,⁴ and by extension in focus groups. Remuneration is crucial to helping achieve

⁴ Singer, Eleanor (2002). "The Use of Incentives to Reduce Nonresponse in Household Surveys." In *Survey Nonresponse*, eds. Robert M. Groves, Dan A. Dillmon, John L. Eltinge, and Roderick J.A. Little. p. 163-77.

an unbiased sample of participants and eligible nonparticipants and to reach the target response rates. The provision of such a fee will help with the recruitment of respondents to encourage them to participate in the focus group. Further, some focus group participants may incur direct costs for attending the focus group, and consequently might not be able to participate without remuneration. Thus, \$20 is a reasonable compensation for any inconvenience and cost associated with participation in the focus group during the data collection period.

10. Assurances of confidentiality

For the study, FNS's contractor, the Urban Institute, will ensure that data are treated in a confidential manner by: 1) releasing no data in a form that identifies individual respondents by name; 2) only requiring focus group participants to provide their first name during the session and implementing procedures to separately and securely store participant signature forms required for accounting purposes to acknowledge receipt of the cash stipend; 3) keeping any documents and notes that contain names from the focus groups in a locked drawer and destroying them at the end of the project; and 4) combining information collected through interviews across other respondents in the same category and reporting the information in aggregate form.

This study is also under the purview of the Urban Institute's Institutional Review Board (IRB). To receive IRB approval for this study, the data collection effort must adhere to the following principles:

- Subjects are informed of the nature of the research and how it will be used, and their consent either obtained or explicitly waived, where risks to them are determined to be minimal.
- Adequate provision is made to protect the privacy of subjects and to maintain confidentiality of data, where promised and as appropriate.
- Risks to subjects are minimized to the extent possible within research designs.
- Risks to subjects (from the research) are reasonable in relation to anticipated benefits (from the research).
- The selection of subjects is as equitable as possible (the burdens and benefits of the research are fairly distributed) and particular attention is paid to research involving vulnerable populations and protected health information.

A copy of the IRB approval and standards will be available from the Urban Institute.

11. Questions of a sensitive nature

Many modernization efforts, such as waiving face-to-face interviews and creating online applications, are designed to improve access. These provisions may have differing effects on individuals with disabilities. Therefore, we are asking one question of a sensitive nature related to whether or not focus group participants have a disability that hinders their ability to work or go outside of their homes. This question will be asked on the Focus Group Participant

Information Form that will be completed by all focus group participants. No identifying information will be collected in conjunction with this question.

12. Burden estimates

12(a). Estimate of respondent burden hours

The data collection efforts will involve surveying and interviewing respondents knowledgeable about modernization efforts at the state and local level. The response pool includes state-level FSP officials and staff (e.g., directors, policy and operations staff, management information systems and data reporting staff, call center staff); local food stamp office staff (e.g., directors, office supervisors, eligibility workers, MIS/reporting staff); staff from community organizations and contractors assisting with food stamp modernization efforts; and food stamp applicants, participants, and eligible nonparticipants.

It is estimated that the study will collect data from approximately 1,275 respondents. This estimated number represents the sum of 135 state-level FSP staff, 402 local-level FSP staff, 234 community organization or contractor staff involved in food stamp modernization efforts, and 504 food stamp applicants, participants, and eligible nonparticipants. Most state and some local FSP staff and community organization and contractor staff may receive the survey and be interviewed for this study, but this overlap cannot be predicted.

The times estimated in the table below are based on a pretest of the survey and case study instruments. Please refer to Appendices A and B for the study's data collection instruments and to section B.4 for an explanation of the pretesting process.

Survey Burden. The estimate of response time for the Survey of State Food Stamp Directors is based upon a pretest conducted with three state food stamp directors and reviews by staff from GAO and the Washington, DC Department of Human Services. The time to complete the survey for the three pretest states was 45 minutes, 2.5 hours, and 4 hours, respectively. We believe that the range in time reflects the extent and timing of state FSP modernization activities, as those factors determine the applicable survey sections to be completed. Although some revisions were made to the survey instrument in response to pretest findings, we believe they would not significantly change the estimated time required to complete the survey. We have assumed an average burden of 2.5 hours per state respondent.

The estimate of response time for the Survey of Local Food Stamp Directors is based upon a pretest conducted with two county food stamp offices and reviews by staff from GAO and the Washington, DC Department of Human Services. The range of time to complete the survey was 2.5 to 4.5 hours. We believe that the range in time reflects the extent and timing of county FSP modernization activities, as well as variations in the role of counties in state modernization decisions. The respondent that reported needing 4.5 hours to complete the survey indicated that a large part of that time was spent conferring with colleagues about responses, in part to provide feedback for the pretest. Although some revisions were made to the survey instrument in response to pretest findings, we believe they would not significantly change the

estimated time required to complete the survey. For purposes of estimating burden, we have assumed an average burden of 2.5 hours per local agency respondent.

The advance letter (Appendix E) to State Food Stamp Agencies asks states to identify counties and organizations or vendors involved in significant FSP modernization activities. The advance letter to County/Local Offices (Appendix E) requests county/local offices to identify primary partner organizations or vendors involved in local FSP modernization activities. We have estimated that it will take one hour for respondents to refer this request to appropriate staff and provide contact information.

The estimate of response time for the Partner Organization Survey is based upon a pretest conducted with three community-based organizations and reviews conducted by the GAO and the California Association of Food Banks. The range of time to complete the survey was 25 minutes to 3 hours. We believe that the range in time reflects the variation in the extent of partner involvement in FSP modernization activities. Although some revisions were made to the survey instrument in response to pretest findings, we believe they would not significantly change the estimated time required to complete the survey. For purposes of estimating burden, we have assumed an average burden of 1.5 hours per partner organization respondent.

Case Study Burden. In each of the states and counties selected, in-depth interviews will be conducted with state level officials, local agency administrators and staff, and partner agency staff (section B.1 describes potential respondents). Questions will be open-ended and tailored to job responsibilities of the individual respondents.

All case study instruments, with the exception of the focus group instruments, were pretested during the initial phase of the project (see B.4 for more information). Four states were visited and interviews were conducted using the semi-structured guides (State Agency, Local Agency and Partner Discussion Guides), applicant/participant intercept interview guide, and on-site observation guide. The staff that conducted the site visits provided feedback on the instruments on aspects such as timing, redundancy, and gaps in content, and refined the case study instruments accordingly. The test interviews using all three discussion guides took approximately 30 minutes to 1.5 hours and, thus, a burden estimate of 1 hour is provided for each of these instruments. The applicant/participant intercept interview and on-site observations are intended as short, on-the-spot data collection efforts from participants and testing of these case study instruments indicated a burden estimate of approximately 6 minutes for each instrument. Burden estimates for the focus groups are based on prior experience with similar data collection instruments and respondents.

Description	No. of Respondents	No. of Responses per Respondent	Estimated Total Responses	Estimated Hours per Response	Total Burden
State-Level: Survey (Appendix A—State Food Stamp Agency Survey)	51	1	51	2.5	127.5
State-Level: Interview (Appendix B-1— State Food Stamp Agency Administrators and Staff)	84	1	84	1	84
Local Level FSP: Survey (Appendix A—Local Food Stamp Agency Survey)	150	1	150	2.5	375
Local Level FSP: Interview (Appendix B-2— Local Food Stamp Office Administrators and Staff)	252	1	252	1	252
Local Community Reps & Contractors: Partner Organization Survey (Appendix A—Partner Organization Survey)	150	1	150	1.5	225
Local Community Reps & Contractors: Partner Agency Interviews (Appendix B-3— Partner Agency Administrators and Staff)	84	1	84	1	84
Food Stamp Participants: Focus Groups (Appendix B-5— Focus Group Discussion Guide: Guide 1 – FSP Participants)	168	1	168	1.34	225.1
Focus Group Food Stamp Program Participants and Eligible Nonparticipants: Information Form (Appendix B-5— Focus Group Participant Information Form: Food Stamp Program Participants and Eligible Nonparticipants)	336	1	336	.16	53.8

Description	No. of Respondents	No. of Responses per Respondent	Estimated Total Responses	Estimated Hours per Response	Total Burden
Food Stamp Applicants/Participants: Intercept Interview (Appendix B-4— Applicant/Participant Intercept Interview)	168	1	168	.10	16.8
Eligible Nonparticipants: Focus Groups (Appendix B-5— Focus Group Discussion Guide: Guide 2 – Eligible Nonparticipants)	168	1	168	1.34	225.1
Letters from UI to State Food Stamp Agencies (Appendix E—Urban Institute Survey Advance Letter to States)	51	1	51	1	51
Letters from UI to Counties/Local Offices (Appendix E—UI Survey Advance Letters to Counties/Local Offices)	150	1	150	1	150
TOTALS	1,812 respondents		1,812 responses	14.7 hours	1,869.3 Hours

12(b). Estimate of burden cost to respondents

Estimates of annualized costs to the respondents are based on an hourly wage rate for the following four respondent categories: State-Level Government Staff; Local-Level Government Staff; Local Community Representatives and Contractors; and Food Stamp Participants, Applicants, and Eligible Nonparticipants. National median wage estimates are used as the survey and case studies will be fielded in all geographic regions. The source for the wage data is the Bureau of Labor Statistics, May 2005 National Industry-Specific Occupational Employment and Wage Estimates, Median Hourly Wages, and the current minimum wage.

Type of Respondent	Total Burden Hours	Median Hourly Wage Rate	Total Respondent Costs
State-Level Government Staff ^a (Survey and Interview)	262.5	\$18.38	\$4,824.75
Local-Level Government Staff ^b (Survey and Interview)	777	\$16.78	\$13,038.06
Local Community Representatives and Contractors ^c (Survey and Interview)	309	\$12.57	\$3,884.13

Type of Respondent	Total Burden Hours	Median Hourly Wage Rate	Total Respondent Costs
Food Stamp Participants, Applicants, and Eligible Nonparticipants ^d (Focus Group/ Applicant/ Participant Intercept Interview)	520.8	\$5.15	\$2,682.12
Total	1,869.3		\$24,429.06

^a NAICS 999200 – State Government

^b NAICS 999300 – Local Government

^c NAICS 624200 – Community Food and Housing, and Emergency and Other Relief Services

^d Minimum wage is used for this respondent category as most have low education and skill levels and approximately 80 percent are not working at this intercept point.

13. Total annual cost burden to respondents or record keepers

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Annualized cost to the Federal government

The total cost of this study including survey administration and site visits is approximately \$1,180,029 over a 36-month period. This amount covers the costs associated with background research, the design of the data collection instruments, data collection activities, analysis, and reporting. The following breaks down the cost for the study by year:

Year 1	\$288,568 (October 2006 – September 2007)
Year 2	\$736,111 (October 2007 – September 2008)
Year 3	\$155,351 (October 2008 – September 2009)

15. Reasons for any program changes or adjustments

This data collection plan is new and does not represent any changes in estimates of respondent burden or cost.

16. Tabulation and publication

The information collection and data analysis will occur in two concurrent phases after OMB approval. The survey, which comprises the first phase of data collection, will be fielded in early 2008 and data will be analyzed in 2008. The following shows the schedule for the survey phase of the study:

Field surveys	January-March 2008
Submit table shells	April 2008
Conduct survey data analysis	April-May 2008
Submit draft interim report	July 2008
Conduct briefing	August 2008
Submit revised interim report	September 2008
Submit interim report	October 2008

The case study phase of the study will occur beginning in July 2008 as follows:

Disseminate state selection letter	July 2008
Conduct site visits	September-November 2008
Submit table shells for final report	November 2008
Conduct case study data analysis	November 2008 - January 2009

Once both phases are completed by mid-January 2009, a final report will be developed and a public use database will be created. The final report and public use database will be made available in the second half of 2009. The final report will categorize modernization efforts across states; compare information on outcomes, success and challenges; and discuss crosscutting issues. The separate components of the final report will include: the stand-alone summary, executive summary, main body of the report, and directory of key food stamp modernization features. It is anticipated that main sections of the final report will describe key findings from the individual case studies, promising practices, and crosscutting issues.

The schedule for their development is as follows:

Submit draft final report	March 2009
Conduct briefing	May 2009
Submit file documentation, codebook and data files	July 2009
Submit final report	July 2009
Submit additional final report copies after FNS clearance	August 2009

Project reports will be made available by FNS and the Urban Institute by posting them to each organization's web-site. The public use data files will be made available by FNS for secondary data analyses by interested stakeholders.

Tabulation and Statistical Analysis: Survey. Data analysis in the survey phase will provide a comprehensive and comparative description of the policies, organizational

infrastructure, and operational procedures that states are pursuing to enhance food stamp application, recertification, and case management. The analysis will capture state and local-level experiences in carrying out modernization efforts and provide insights into the variations between states and between local areas that may exist.

The analysis will focus on taking the large amounts of information collected through the surveys and presenting it in summary formats that allow FNS and other stakeholders to quickly grasp the range of initiatives in a state and the range of states undertaking a particular type of initiative. We will also summarize details of the policy initiatives, such as whether they are statewide or limited to specific counties or regions, and whether nonprofit organizations and for-profit firms are involved. Other tables will summarize the reasons given by respondents for the adoption—or nonadoption—of a particular type of initiative, along with the intended and perceived effects on outcomes such as participation, payment error, and administrative costs. These results will be used to identify associations between modernization strategies and a variety of outcomes that will be explored further in the subsequent case study and integrative analysis.

Tabulation and Statistical Analysis: Case Studies. Case study analysis will synthesize the qualitative data collected through the 14 site visits, where interviews with multiple informants will occur. This analysis will focus on the scale and scope, unique features, implementation schedules, characteristics of participants, state characteristics, perceptions of successes and challenges, and lessons learned. Analytic files from site visit data will be developed. Tables will be developed for the case studies to identify and categorize models of modernization and look for trends in modernization efforts across states.

At this point, analysis from both phases of the information collection will be synthesized to produce a final report and briefing. This overall analysis involves identifying patterns and themes and synthesizing the data to suggest models and interpretations supported by the data. This process is the part of analysis that sharpens, sorts, focuses, discards, and organizes data in such a way that conclusions can be drawn and verified. The analysis will integrate case study data with relevant information from state, local, and partner surveys as well as the FNS national databank, public use and quality control data, FNS publications, and state-specific data sources.

The qualitative information gleaned through case studies will be essential to interpreting outcomes in 14 of the states. Interviews with program staff and other stakeholders will help us put outcomes in the context of the goals of modernization and the demographic, economic, and social service climate of each state. They will also help us determine which initiatives may be showing short-run costs but have large long-run savings potential (e.g., implementing a new eligibility database, where two eligibility systems must often run concurrently during the transition but the new system will be more efficient when fully implemented). Or, there may be cases where there are short-term administrative savings but significant longer-term costs may accrue (for instance, when state staff are laid off as contractors assume eligibility functions resulting in short-term cost savings, but significant service capacity and expertise with eligibility determination in the longer term may be lost).

In the integrative analysis, we will pay particular attention to the criteria for identifying promising practices and evaluating their generalizability to other states. Our highlights of

promising practices will include those states in which more than one outcome has improved, or where at least one outcome has improved without harming outcomes in other domains. In other words, we would prefer to choose initiatives that have improved the efficiency and effectiveness of the FSP without harming any of the program's major goals. Our first preference would be to highlight modernization initiatives where quantitative data demonstrate a significant positive impact, and that impact is attributable to the initiative. We may also choose to highlight initiatives that may not yet have shown a demonstrable impact, but have done no harm and show great potential for long-run improvement, according to the stakeholders responding to our study.

17. Approval to not display the OMB expiration date

The agency plans to display the expiration date for OMB approval on all data collection instruments. Please see Appendices A-B.

18. Exception to the certification statement

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.