

SUPPORTING STATEMENT FOR

**EVALUATION OF THE UNDERSERVED ELDERLY AND WORKING POOR IN
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP): FY 2009 PILOTS**

[DATE]

Prepared for:

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Appendix A: Recruitment Script, Working Poor

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Appendix C: Focus Group Reminder Letter

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Appendix G: Focus Group Reminder Letter - Spanish

Appendix H: Focus Group Reminder Call - Spanish

Appendix I: Focus Group Discussion Protocol – Spanish

A. JUSTIFICATION

A.1. Circumstances Making the Collection of Information Necessary

This is a new collection of information.

According to the latest (2007) U.S. Department of Agriculture (USDA) estimates, less than one-third of elderly (age 60 and older) persons who are eligible for the Supplemental Nutrition Assistance Program (SNAP) actually participate in the program. Less than three-fifths of persons in eligible households with someone working participate in the program. These low participation rates suggest that many elderly or working poor people who need SNAP are not receiving its assistance. Without SNAP, elderly individuals may not be able to meet their nutritional needs or may forgo medicine for food; working people may not be able to adequately feed their families, despite their work efforts.

Legislative Authority. The Omnibus Appropriations Act of 2009 (P.L. 118-8) provided \$4.5 million for the USDA Food and Nutrition Service (FNS) to pilot and evaluate a range of approaches for expanding access to SNAP among two key underserved populations—eligible households with elderly members and eligible households with adult members who are working or are looking for work (working poor households). In turn, FNS funded six state demonstration programs to increase SNAP access to either of these populations. In addition, FNS will conduct an evaluation of these demonstrations. Through an evaluation, FNS will be able to advise Federal policymakers and state administrators on the best approaches to increasing SNAP access for two underserved populations.

The evaluation will describe changes the demonstration programs make to SNAP operations, rules, or policies; the rationale for those changes; and the process of implementing them. Specifically, by examining implementation procedures, changes in participant characteristics, the source and outcome of SNAP applications, and client experiences and satisfaction with the demonstration, the evaluation aims to identify the reasons for demonstrations' successes and challenges. Over four years, this evaluation will analyze quantitative and qualitative data gathered from the American Community Survey (ACS), program documents, state administrative case records, state administrative expenditure (SAE) filings, SNAP Quality Control (QC) error records, site visits, and client focus groups.

Evaluators from FNS's contractor, Mathematica, will conduct one focus group in each of six demonstration states. The respondents are individuals and households. The target group consists of the heads of elderly or working poor households that submitted an application for SNAP within the three months preceding the focus group (regardless of their SNAP eligibility status). Demonstration states will provide contact information for the target group from their own administrative records.

Evaluators will contact up to 200 respondents in each of six states for a total of 1,200 respondents, in order to recruit approximately 25 participants in each of six 90-minute focus group for a total of 150 participants. FNS expects that approximately 10 participants from each state – a total of 60 -- will participate on the day of the group. Two to four weeks before the focus group, trained staff will begin calling applicants who live in the zip codes closest to the focus group location. This approach ensures that evaluators call first those for whom transportation is less burdensome, hopefully increasing the number of contacted applicants who will agree to participate in the group. Calls for each focus group will continue until 25 applicants

agree to participate in each state. Staff will use a recruitment script (Appendix A or B, depending on the nature of the group) to introduce the evaluation, describe the purpose of the focus group, ensure the respondent is eligible to participate in the group, and ask the respondent to participate.

A.2. Purpose and Use of the Information

Callers will recruit a mix of genders and ages (within the target age ranges for each group of respondents). One week before the focus group, evaluators will send a reminder letter to each respondent who agreed to participate (Appendix C) along with directions to and a map of the focus group location. The day before the focus group, evaluators will call recruited applicants to remind them of the focus group date, time, and location (Appendix D). Contact information for all individuals contacted for this data collection will be destroyed following the focus groups, and they will be assured that voluntary participation (or declining to participate) will not affect their eligibility for SNAP.

One of the six demonstration projects focuses on a population that primarily speaks Spanish. For that site (one of the three focusing on working poor), translated recruitment, reminder, and discussion group moderation tools will be used (Appendices F-I). The three sites focusing on outreach to elderly clients serve English-speaking populations.

A.2. Purpose and Use of the Information

Two key research questions in the evaluation are, “What was the overall effect of the demonstrations on client satisfaction?” and “What activity, message, or program change had the most influence on bringing in new participants from the target group, as perceived by clients?” To address these questions, evaluators will convene focus group discussions that concentrate on how applicants learned about SNAP, their experiences completing the application, and their perceptions of accessing the program. Trained research staff will use a pre-tested protocol

(Appendix E) to structure the 90-minute discussion and encourage participation. Results will be used by policymakers and program administrators to assess client satisfaction with the demonstration, identify which aspects of the demonstration may be more or less associated with SNAP application and participation outcomes, and identify potential improvements to the demonstration approaches. In addition, summary information (without any personal identifiers) obtained from this collection may be shared with other organizations that would benefit from the data, such as state and county SNAP offices.

A.3. Use of Information Technology and Burden Reduction

Although FNS is committed to compliance with the E-Government Act, 2002, this collection will not employ information technology. Instead, a trained and experienced professional researcher will conduct the focus groups using a semi-structured protocol to facilitate an informal group discussion that flows like a natural conversation. Another researcher will take notes during the focus group, to allow the group facilitator to focus on the conversation.

A.4. Efforts to Identify Duplication and Use of Similar Information

There is no similar information. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely administers SNAP. The information required for this study is not currently reported to State Agencies on a regular basis in a standardized form.

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

No small businesses will be involved in this information collection.

A.6. Consequences of Collecting the Information Less Frequently

This is a one-time collection effort. Congress provided funds to test the effectiveness of different outreach techniques to increase SNAP participation among the elderly and working poor. The data collection plan described in this submission is necessary for conducting the Evaluation of Underserved Elderly and Working Poor in SNAP: FY 2009 Pilots and will help FNS understand how participants learn about, access and experience the SNAP application process. Without this study, FNS will not be effective in determining the needs in the underserved groups in order to increase SNAP participation among the elderly and working poor.

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

There are no special circumstances. The collection of information is in a manner consistent with the guidelines in 5 CFR 1320.5.

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

Public comment. In accordance with 5 CFR 1320.8 (d) 1995, a notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, April 22, 2010, Vol. 75, No. 77, Pages 20977-20979. No comments were received.

Consultation with Experts. In addition to soliciting comments from the public, FNS consulted three Mathematica senior technical staff about the availability of data, design, level of burden, and clarity of instructions for this collection:

Jacqueline Kauff: Senior Researcher and Project Director	202-484-5266
James Ohls: Senior Fellow and Principal Investigator	609-275-2377
Scott Cody: Associate Director of Research	202-484-4523

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

There are two different types of focus groups based on participant characteristics: elderly and working poor. Each focus group participant will receive \$40 for their participation, and for transportation and/or child care expenses, which is the amount that was provided to SNAP participants in FNS-sponsored focus groups on the SNAP application process in Florida.¹

All payments will be provided in cash, which will more immediately assist respondents with offsetting transportation and childcare costs than a gift card or check might. In addition to the cash payment, evaluators will provide light refreshments during the mid-afternoon focus groups with elderly SNAP applicants and a pizza dinner during the evening focus groups with working poor SNAP applicants.

A.10. Assurance of Confidentiality Provided to Respondents

The proposed collection will not gather any confidential data. The information provided will be kept confidential and will not be disclosed to anyone but the individuals conducting research in this focus group, except as otherwise required by law. During the collection, the evaluation's database will retain contact information for each focus group participant, but this information will not be released to anyone outside the evaluation team and will be destroyed upon release of the evaluation's final report. Advance letters sent to respondents will provide assurance that information being gathered is for research purposes only. The identity of the respondent will not be disclosed to anyone outside of the evaluation project, including demonstration staff. In accordance with the FNS Privacy Act, Mathematica will safeguard all data, and only authorized users will have access to them. The focus group facilitator will tape record each focus group

¹ Cody, Scott D., Renée Nogales, and Emily Sama Martin. "OMB Control Number 0584-0537, "Modernization of the Food Stamp Program in Florida." Report submitted to the U.S. Department of Agriculture, Food and Nutrition Service. Washington, DC: Mathematica Policy Research, February 2008.

discussion beginning after all introductions have been made. Respondents will be informed about the recording and instructed that they may request that the recording be suspending at any time. If there are any objections to the tape recording, the facilitator will not record the session. No identifying information will be asked during the focus group and we will only call respondents by their first names; thus no identifying information will be included in the tape recording.

A.11. Justifications for Sensitive Questions

No sensitive questions will be asked.

A.12. Estimates of Hour Burden Including Annualized Hourly Costs

The estimated time per response varies from .0835 hours (5 minutes for a telephone screening) for focus group nonparticipants to 1.667 hours (100 minutes) for those who are eligible for and participate in the focus group (5 minutes for screening, 5 minutes for reminders by phone and mail, and 90 minutes for the group). The estimated total annual burden for respondents is 195.22 hours. This includes contacting and screening 1,200 respondents at 6 sites for the data collection focus groups, for a total of 60 data collection focus group participants at 6 sites. See Table A.12.1, below, for estimated total annual burden for each type of respondent.

The bulk of annual burden time will be spent participating in focus groups, which will last approximately 90 minutes each. In addition to the focus groups, we expect all respondents (including focus group participants and nonparticipants) to incur about 5 minutes of burden for the initial telephone screener, and for focus group participants to incur another 5 minutes, on average, to receive a reminder call and read a reminder letter. The total cost to respondents for their time in this collection is \$1,464.08 (Table A.12.2). To calculate the annualized cost to respondents, we used the average 2009 minimum wage rate across the six states included in the

evaluation (obtained from the Statistical Abstract of the U.S. Table No. 636 Federal and State Minimum Wage Rates: 1940 to 2009). Estimates for the total cost to respondents for this collection are based on respondent in two categories: working poor focus groups, and elderly focus groups.

Table A.12.1. Estimated Total Annual Burden by Respondent Type

Respondent*	Estimated # Respondents	Responses Annually per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response	Estimated Total Hours**
Working Poor Focus Group Respondents					
Focus Group Nonparticipants	570	1	570	0.0835	47.60
Focus Group Participants	30	1	30	1.667	50.01
Elderly Focus Group Respondents					
Focus Group Nonparticipants	570	1	570	0.0835	47.60
Focus Group Participants	30	1	30	1.667	50.01
Total Reporting Burden	1,200		1,200		195.22

* Focus group nonparticipants will participate in a brief screening call only. Focus group participants will participate in a brief screening call, participate in the focus group, and receive a reminder call and letter prior to the focus group.

** The total burden includes an initial screening call for participants and nonparticipants, as well as a reminder call and letter and focus group time for the participants.

Table A.12.2 Annual Cost to Respondents

Respondent	Average Time per Response	Number of Respondents	Frequency of Response	Median Hourly Wage Rate	Respondent Cost
Working Poor Focus Group Respondents					
Focus Group Nonparticipants	0.0835	570	1	\$7.50	\$356.96
Focus Group Participants	1.667	30	1	\$7.50	\$375.08
Elderly Focus Group Respondents					
Focus Group Nonparticipants	0.0835	570	1	\$7.50	\$356.96
Focus Group Participants	1.667	30	1	\$7.50	\$375.08
Total Annual Cost to All Respondents					\$1,464.08

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

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

A.14. Annualized Cost to Federal Government

The total costs of this evaluation include a Time and Materials contract with Mathematica in the amount of \$1,464,967 and time spent by the federal project officer to manage data collection in the amount of \$62,000 (an estimated half FTE over the course of a year, times my salary, plus a 6 site visits at \$1,000 per visit.) Thus, the total cost of the evaluation is estimated at \$1,514,967. Contract costs include design of the evaluation and development of data collection instruments, data collection, analysis, and report writing. The evaluation will be conducted over a four-year period. Thus, annualized contract costs for the evaluation are \$366,242 per year.

A.15. Explanation for Program Changes or Adjustments

This is a new collection of information resulting in a program change of 195 burden hours.

A.16. Plans for Tabulation and Publication and Project Schedule

Products resulting from information obtained in this data collection will provide FNS with a picture of participant experiences learning about and applying for SNAP benefits under the new outreach models. Mathematica will integrate the information obtained from focus groups with information obtained from the other components of this evaluation to draw comparisons across and within counties and States, discussing factors that might lead to any observed variation. The analysis will provide FNS, states, county and local agencies, and partners with feedback on how their outreach models may impact SNAP enrollment among target populations.

A final report will present key findings of the evaluation in clear, nontechnical language that makes it accessible to a wide audience of policy makers, researchers, and program staff. Table A.16.1 presents the schedule for the deliverables. No complex quantitative analytical techniques will be employed with data from this collection. The final report, to be published on the FNS website, will include a stand-alone summary of the purpose, methodology, key findings, and policy implications, as well as a short executive summary.

Table A.16.1 Data Collection, Analysis, and Reporting Schedule

Data collection	
Recruit & screen participants	4-5 months after OMB approval
Reminder letter to participants	5-6 months after OMB approval
Reminder call to participants	5-6 months after OMB approval
Conduct focus groups	5-6 months after OMB approval
Data analysis	7-11 months after OMB approval
Interim Report	
Draft report	13 months after OMB approval
Revised report	14 months after OMB approval
Final report	16 months after OMB approval
Final Report	
Draft report	30 months after OMB approval
Revised report	33 months after OMB approval
Final report	36 months after OMB approval

A.17. Reason(s) Display of OMB Expiration Date is Inappropriate

The agency will display the OMB expiration date on all focus group materials.

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

There are no exceptions to the certification statement.