

## Memorandum

**Date:** October 27, 2011

**To:** Julie Wise, OMB Desk Officer, Food and Nutrition Service

**Through:** Rachelle Ragland Green, Food and Nutrition Service, Information Clearance Officer; Ruth Brown OCIO Desk Officer

**From:** Anita Singh, Acting Director, Family Programs Branch, Office of Research and Analysis  
USDA – Food and Nutrition Service

**Re:** Under Approved Generic OMB Clearance No. 0584-0524  
Request Approval to Perform Formative Research –  
Qualitative Interviews of Supplemental Nutrition Assistance  
Program (SNAP) Who Report Zero-Gross Income

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) Food, Nutrition and Consumer Services (FNCS) is requesting approval for formative research under Approved Generic OMB Clearance No. 0584-0524.

This request is to acquire clearance for conducting 50 one-on-one semi-structured, qualitative interviews with SNAP participants who report zero-gross-income on their SNAP applications or recertification documents. The purpose of the interviews is to gain a better understanding of the coping strategies of SNAP participants with no other income than SNAP.

The following information is provided for your review:

1. **Title of the Project:** Formative Research for better understanding the coping strategies of Supplemental Nutrition Assistance Program participants who report zero-gross-income on their SNAP applications or recertification forms.
2. **Control Number:** 0584-0524; Expiration Date: 4/30/2013
3. **Public Affected by this Project:** Individuals/Households; State/local representatives
  - Supplemental Nutrition Assistance Program (SNAP) participants who report zero-gross-income on their SNAP applications or recertification forms.
  - State SNAP staff will be asked to compile a list of zero-income SNAP participants from their administrative files.
  - Local SNAP staff will be asked to provide interview space in the SNAP office.
4. **Number of Respondents:**  
Fifty SNAP participants with zero-gross income will participate in semi-structured, qualitative interviews. In order to recruit 50 respondents, 200 potential participants will be recruited.

Recruitment will be conducted in eight counties in four states: Maryland, Virginia, West Virginia, and the District of Columbia. FNS will contact SNAP Directors in Virginia, Maryland, West Virginia and the District of Columbia to request their

cooperation in providing Excel spreadsheets listing active, zero income SNAP participants who were certified or recertified between January and March 2012 (Attachment C). The contractor will provide detailed instructions and an example spreadsheet to the State explaining how to transfer the data through secure File Transfer Protocol (FTP) (Attachment D). Once the states submit lists of qualifying participants, the evaluation contractor will review them to determine that those on the list meet minimum qualifying criteria (i.e., they reported zero-gross-income on their SNAP application or recertification form). The research contractor will then contact a selection of those on the lists to ask if they will participate in the qualitative interviews. In order to get 50 interviews, we anticipate speaking with about 200 potential respondents. Thus there would be 150 non-respondents. A copy of the recruitment script is attached (Attachment E).

**5. Time needed per response:**

In the tables below, the time noted is an average response time for each member of the target audience.

- State SNAP staff involvement includes identifying eligible SNAP participants in their SNAP participation database and compiling a list of names with contact information.
- Local SNAP staff involvement includes providing interview space to the research contractor's staff and SNAP participants.
- SNAP participants' involvement includes speaking for one hour with a staff person from the research contractor's staff for a one-on-one, semi-structured qualitative interview.

*Time Needed per Initial SNAP Participant Recruitment & Consent*

<b>Target Audience</b>	<b>Time (minutes)</b>	<b>Time (hours)</b>
State SNAP staff (N=4)	240	4
Local SNAP staff (N=8)	30	.5
SNAP Participants (N=200)	3	.05

*Time Needed per Qualitative Interview*

Target Audience	Time (minutes)	Time (hours)
SNAP Participants (N=50)	60	1

**6. Total burden hours on public:**

(a) Affected Public	Respondent Type	(b) Qualitative Interview	(c) No. Respondents	(d) Frequency of Response	(e) Est. Total Annual Responses per Respondent (c x d)	(f) Hours per Response	(g) Total Burden Hours (e x f)
<b>Reporting Burden</b>	<b>Formative Round</b>	<b>(February-May 2012)</b>					
<b>Individuals &amp; Households</b>	SNAP Participant	Recruitment for Interview - Nonresponse	150	1	150	.05	7.5
		Recruitment	50	1	50	.05	2.5
		Interviewees	50	1	50	1	50
		<b>Subtotal</b>		<b>200</b>	<b>1</b>	<b>250</b>	
<b>State, Local, Tribal Agencies</b>	State SNAP Staff	Recruitment: Provision of Contact Lists	4	1	4	4	16
	Local SNAP Staff	Recruitment: Provision of Office Space for Interviews	8	1	8	.50	4
	<b>Subtotal</b>		<b>12</b>	<b>-</b>	<b>12</b>	<b>-</b>	<b>20</b>
<b>Grand Total</b>			<b>212</b>		<b>262</b>		<b>126</b>

## 7. **Project purpose, methodology, and formative research design:**

### Background

FNS administers the nutrition assistance programs of the United States Department of Agriculture (USDA). The mission of FNS is to provide children and low resource families better access to food and a more healthful diet through its nutrition assistance programs. One of these programs is the Supplemental Nutrition Assistance Program (SNAP). Applicants for SNAP must provide documentation of their income and assets, and must pass a gross income test and a net income test. The former includes all of a family's cash and government assistance. The latter is gross income minus several family-specific deductions, such as a utility allowance and a child care expense deduction. The number of SNAP participants reporting no gross income at all has been increasing steadily. In 1999, the percentage of participants reporting zero-gross-income was 8.5% in 1999 and had increased to 19.7% by 2010. The pattern of increase continued even when economic conditions were improving. Little is known about this group.

### Purpose

This study seeks to better understand the characteristics and circumstances of zero-income SNAP participants through qualitative interviews with 50 people in this group.

Qualitative research will help FNS gain a better understanding of the family composition, the coping strategies, and whether or not the zero-income status is variable.

### Methodology/Research Design

The research contractor will conduct 50 qualitative, semi-structured, individual (one-on-one) interviews with SNAP participants who reported zero-gross-income on their SNAP application or recertification forms. The respondents will be recruited by the research contractor through contact lists supplied by the SNAP agency in the four target states (VA, WV, MD, DC). The research contractor will contact the potential respondents, explain the research project, and ask them if they would like to participate. All participation is completely voluntary. We expect to speak with about 200 potential respondents to obtain participation from 50. Although the research contractor will attempt to interview people with a variety of demographic characteristics, such as race, age, gender, and family type, the key selection criteria will be SNAP participants with zero-gross-income. There are no demographics questions in the interview. The interviewers will simply observe and make their best judgment regarding demographic factors. This is done because demographics are not a key aspect of the research. The selection criteria are simply SNAP receipt combined with zero-gross income.

### Design/Sampling Procedures

Our method is a two-stage purposeful sampling design. The first stage involves the selection of counties in and around the DC metropolitan area from which to draw the study sample. The second stage involves sampling zero-gross-income SNAP participants for the in-depth interviews. The research contractor will select among eight counties within Maryland, Virginia and West Virginia that are likely to include a diverse array of SNAP participants with no reported income. This step represents the first sampling stage.

For the second stage of sampling, we will select sample members from lists provided by the States and the District of Columbia. FNS will mail each of the target states' SNAP Director an initial letter explaining the purpose of the study and requesting their participation (Attachment C). A detailed set of instructions for preparing the data file and submitting it to the research contractor will also be included with the letter for their information (Attachment D). Within one week of mailing the letter, the research contractor will contact the Director by phone to discuss the data request and to answer any questions the Director may have about the study. A script for the recruitment phone call is attached (Attachment F).

### Site Selection

Eight demographically diverse counties in three states and the District of Columbia will be chosen as the study area. Counties were chosen so that a variety of demographic and income experiences were represented.

Table 1. Proposed Sampling Areas

County	Percent Hispanic	Percent of Persons Below Poverty Level
Howard County, MD	5.4%	4.3%
Montgomery County, MD	16.1%	5.8%
Prince George's County, MD	13.5%	6.7%
Arlington County, VA	17.1%	6.7%
Loudoun County, VA	10.7%	3.1%

Prince William County, VA	18.7%	5.3%
Washington DC	8.8%	16.9%
Jefferson County, WV	4.7%	9.2%
Berkeley County, WV	3.8%	10.6%

Recruitment

With contact lists from the states, the research contractor will begin contacting potential respondents and ask for their participation in the study.

Incentive/Reimbursements

Respondents will be given a gift card for \$25 to a local grocery store as reimbursement for expenses such as travel and child-care. The selection of this amount comes from past experience of the evaluators in the recruitment of low-income, vulnerable populations.

Interview Sessions

*Time.* Interviews will last for one hour each.

*Interview Content.* A trained moderator will facilitate the semi-structured interviews following an interview guide. The guide is included in English and Spanish (Attachment A1 and A2, respectively).

*Consent.* Individual consent forms will be collected at the beginning of each interview (Attachments B1(English) and B2 (Spanish)). These forms are modeled on the forms previously approved by OMB under FNS Core Nutrition Messages Concept, Testing ICR Reference No.: 200809-0584-003 (OMB control number: 0584-0524), modified only to reflect the content of the interviews.

Data Analysis

Interviews will be audio-recorded using professional equipment, and the information collected will be used to better understand this subgroup of SNAP participants. Recordings will be transcribed (with no names associated with individual respondents' comments). Notes taken during the interviews and transcripts of audio recordings will be the primary methods of data collection. Transcripts and notes will be reviewed for recurring themes stated across multiple respondents. Differences across respondents will also be noted as appropriate. Findings will be considered descriptive and directional, but not definitive. No attempt will be made to generalize findings as nationally representative or statistically valid.

Outcome

Information gathered from the specific target audience through the research will help to understand more about this specific subgroup of SNAP participants, particularly their characteristics, circumstances, and coping strategies. FNS may decide to publish the findings from the interviews either electronically or in print, but such documents will not include information that personally identifies interview participants. Research findings are generally posted to the FNS website at <http://www.fns.usda.gov/ora/menu/Published/SNAP/SNAP.htm>. FNS or the contractor may submit an article to an academic journal.

8. **Confidentiality**

Using the *Agreement on Security of Comments Form* (Attachment B), participants will be informed of confidentiality and privacy act provisions before responding to the interview. System of Record FNS-8, FNS Studies and Reports, published in the Federal Register on 4/25/1991 at 56 FR 19078, covers personal information collected under this study and identifies safeguards for the information collected.

9. **Federal Costs:** This is a three year study with a total budget of \$435,612. Federal costs for year 1 will be \$145,204; for year 2, \$145,204, and for year 3 the cost will be \$145,204.

10. **Research Tools/Instruments:**

- Attachment A.1 – Interview Guide for the Semi-Structured Interviews: English
- Attachment A.2 – Interview Guide for the Semi-Structured Interviews: Spanish
- Attachment B1 – Consent Form – English
- Attachment B2 – Consent Form - Spanish
- Attachment C – Letter to States asking for participant contact lists
- Attachment D – Instructions to States for submitting Excel spreadsheets with participant contact lists
- Attachment E – Phone Recruitment Script: SNAP Participants
- Attachment F – Phone Recruitment Script: State SNAP Staff