**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 USDA Food, Nutrition and Consumer Services 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.

1. **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 lists of active, zero income SNAP participants who were certified or recertified between January and March 2012. Once completed forms are returned, 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.

1. **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 to two hours with a staff person from the research contractor’s staff for a one-on-one, semi-structured qualitative interview.

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| *Time Needed per Initial SNAP Participant Recruitment & Consent* | | |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| State SNAP staff (N=4) | 240 | 4 |
| Local SNAP staff (N=8) | 30 | .5 |
| SNAP Participants (N=200) | 2 | .03 |

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| --- | --- | --- |
| *Time Needed per Qualitative Interview* | | |
| **Target Audience** | **Time (minutes)** | **Time (hours)** |
| SNAP Participants (N=50) | 60-120 | 1 - 2 |

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

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| --- | --- | --- | --- | --- | --- | --- | --- |
| (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) |
| **Reporting Burden** | **Formative Round** | **(April-May 2012)** |  |  |  |  |  |
| **Individuals & Households** | SNAP Participant | Recruitment for Interview | 200 | 1 | 200 | .03 | 6 |
| Interviewees | 50 | 1 | 50 | 1 to 2 | 100 x |
|  | **Subtotal** |  | **200** | **1** | **250** |  | **106** |
| **State, Local, Tribal Agencies** | 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 |
| **Subtotal** |  |  | **12** | **-** | **12** | **-** | **20** |
| **Grand Total** |  |  | **212** |  | **262** |  | **126** |

1. **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.

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. 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. 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.

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

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| 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 between one and two hours each.

*Interview Content.* A trained moderator will facilitate the semi-structured interviews following an interview guide.

*Consent.* Individual consent forms will be collected at the beginning of each interview. 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), with the only modifications to reflecting 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.

1. **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.

1. **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.
2. **Research Tools/Instruments:**
   * Attachment A – Interview Guide for the Semi-Structured Interviews
   * Attachment B – Consent Form

**Attachment A:**

INTERVIEW GUIDE FOR ZERO INCOME STUDY

Thank you for taking the time to talk with me today. Before we begin, I’d like to tell you a little bit about why we are doing these interviews. They are part of a study for the Food and Nutrition Service – the agency that provides Supplemental Nutrient Assistance Program (SNAP) benefits (formerly known as the Food Stamp Program). We know that a growing number of people in this country are out of work and have no income. What we want to find out is, how are these people are getting by? For example, how do they manage to find food and a place to live? And how can the SNAP program provide the kind of help that people need most?

Everything you tell me is private and will not affect any benefits you may be getting. At the end of the study, we will summarize the information we get from everyone we interview, and share that summary with the Food and Nutrition Service. We won’t, however, report your name. We will also take care to see that no one identifies your name with the information to anyone outside this study except as otherwise required by law. With your permission, I would like to record the interview so that I don’t miss anything. Is that ok with you?

You will receive a $25 gift card to thank you for your participation. You may stop the interview at any time and you may refuse to answer any question with no penalties to you or your SNAP benefits. If you decide to not respond to any questions, you will still receive the gift card to thank you for your time.

Do you have any questions for me?

Do I have your permission to begin?

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| SNAP History and use of other assistance  Goals are to find out:   * SNAP usage patterns * Other food sources * Other types of assistance used |
| Let’s start by reviewing some basics. I understand you are currently receiving SNAP benefits, is that correct?  How did you first find out about the SNAP program?  How did you come to the decision to apply?  Possible probe: did you or anyone in the household not have enough to eat or not enough of the types of foods you’d like to eat?  Is this the first time you decided to apply, or have you used SNAP benefits before?  If you have used them before, when did you first start getting them?  Were you working then? Can you tell me more about that?  *If not working*: how long were you out of work?  *If working:* how long did you stay at the job, and did you ever earn enough to get off the SNAP benefits?  Have you been receiving SNAP benefits ever since you first applied or are you sometimes on and sometimes off?  *If on and off:*   * Can you tell me about when you received SNAP benefits and when you don’t? What makes you go on and off?   + - * What is the longest period of time that you were getting SNAP benefits?   Other than SNAP benefits, do you get any other assistance, like *TANF* or *Medicaid*?    *Before moving on, interviewer will briefly summarize what the respondent has said, to make sure all information was captured, and to provide the interviewee with an opportunity to elaborate on anything*. |

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| **Employment**  Goals are to find out:   * Whether person is working now * If yes   + what type of work   + whether its temporary/seasonal   + whether it is a stepping stone to another opportunity   + the extent to which it “pays the bills” * If no:   + how long person has been out of work   + work history   + whether person is looking for work and if not, why not * Work/income patterns * Duration of no income spells |
| Let’s talk a bit about work. A lot of people are out of work these days. What about you, are you working now?  ***If working now:***  Can you tell me more about that?   * Do you have a steady job, or are you earning money here and there?   ***Has a steady job:***   * What do you do there? * How long have you worked there? * Do you work full time or part time?   [If part time] Would you like to work more hours? Full time?   * How did you come to find this job? * How easy or hard is it for you to make ends meet working at this job? * Overall, would you say that this job meets your needs, or would you rather have something different? (If something different ask: what would you like to have in a job? Are you looking now?)   ***Does not have a steady job:***  *-* What kinds of things do you do to earn money here and there?  *-* What has that been like? For example, how well are you able to make ends meet?  *-* Overall, would you say that this arrangement meets your needs, or would you rather have a steady job?  ***If not working now:***  About how long have you been out of work?  *If respondent is unsure, try to establish a timeframe by asking about last place worked.*  Can you tell me about the last place you worked?   * What kind of work did you do? * What were the hours like? * About how long did you work there (can probe by asking about seasons, or holidays or years)? * Why did you stop working there?   Some people get unemployment benefits when they lose their jobs. Are you familiar with that? Have you ever gotten unemployment benefits? (If yes ask: Tell me little bit about that, for example, how long did you get unemployment benefits?)  Have you been looking for work?  ***Possible probes if looking for work:***  ***-*** How has your job search been going?  ***-*** What kind of work are you looking for?  ***Possible probes if not looking for work:***   * I know there are all sorts of reasons that people stop looking for work. Can you tell me about your situation?   What’s the longest period of time that you have been out of work?  How long did it last, and how did it end? |

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| **HOUSING AND COPING STRATEGIES**  Goals are to find out:   * Where the person is living (house, apartment, shelter, etc) * Whether he or she lives with other people * Residential history: how long the person has been living there. If not long, where he or she was living before that. Has there been a lot of moving around or couch surfing and if so, how long has this been going on. * Whether the person expects to be able to stay where he or she is living now * How person is coping with no income * How he or she obtains basic necessities, and how often he or she has had to go without those necessities * What sources of support may be available |
| Now I’d like to talk a bit about how you have managed to support yourself when you have been out of work. Let’s start by talking about some basic necessities, like housing.  I know some people have their own place, while other people don’t, and they may end up moving around a lot. Can you tell me about your situation?  *If not interviewing at home ask*: Where you are living these days*?*   * *[Probe]*: Are you living in a house, apartment, shelter? In your car? Are you homeless?   *If interviewing at home ask*: Is this where you are living now?  *If not already stated in a previous response*: Do you live alone, or with other people?   * If living with other people: Who else lives with you? (Find out how many people and their relationship to the respondent). [Why don’t you tell me the first name of each person and their relationship to you?]   How did you come to live there/here?   * How long have you been living or staying there (here)?   + Has it been a few days, weeks, months, longer? * Is this arrangement temporary or long-term for you?   ***If temporary:***  How long do you expect to be able to stay there (here)?  What will you do when you can no longer stay there?  Can you tell me about the place where you were living or staying before now?   * How long were you living or staying there? * Were other people living there with you? * At the time, did you consider that a temporary place to live, or not?   *Interviewer should summarize respondent’s living situation, for example, “*OK, so you told me you are living…*” If subject of housing costs has not come up, say:*  Please tell me about any housing expenses or arrangements you may have, for example, do you have rent, or a mortgage, or are you working in exchange for housing?  - *If paying for housing*: How do you cover those expenses?  *- If living with others*: Tell me about how you and the people you live with handle housing expenses. (e.g., do you put your money together to pay rent? How do you split it? What happens when one person doesn’t have any money?) Are there other expenses you share, like groceries?  Let’s talk more about these other kinds of expenses. Do you have regular bills you have to cover each month? Can you tell me what they are and whether you are able to cover them?  How do you manage to get things like food, other necessities (e.g., toothpaste, soap, shampoo, medication etc.), or clothes when you need them, especially warm clothes when you need them?  Do you sometimes end up having to do without these things?  ***If yes:***  What things have you had to go without?   * Have you had to skip a meal? Can you tell me about that? * How often does that happen? Does it happen more often at certain times of the week/month/year? * Are you getting regular meals now? If so, how are you getting those meals?   ***If no:***  How do you get the things you need when you don’t have money?   * Is there anyone you can turn to for help? * Have you ever tried bartering, selling things, or borrowing? Can you describe how that worked?   *If not already addressed*: Earlier, you told me that you are living with (refer to earlier answer).   * Can you tell me about how you and (identify others in the HH) handle household expenses? For example, do you put your money together to pay for things like groceries? * What do you do when you or the other person doesn’t have any money?   Does anybody ever give you food or free meals - like at a food pantry or a church or shelter?   * Is this a place where you eat or do they give you groceries that you can take with you? * How often do you go there? * How did you find out about this place?   Is there anyone who sometimes helps you cover your expenses? |

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| **Family**  Goal is to find out:   * If respondent has family members who depend on him/her for support, or if there are family members who can provide support |
| Now I’d like to gather some (more) information about your family.  *Summarize any information about family that has already been disclosed (e.g., ok, so you told me you have two children that are living with you…).* Are there other family members you keep in touch with?  *If no information about family has been shared, say*: Please tell me a little about your family.   * First, do you have any children? If so, how old are they? Where do they live? Are you in touch with them? * Any siblings? What are their ages? And where are they? Are you in touch with them? * What about parents? (Are they still living? Are you in touch with a mother/father/step-parent? Where do they live?) * *If not already discussed:* Do any of these family members, or any you have not talked about yet, depend on you for support? * *If not already discussed:* Is there anyone outside of your family who depends on you for support? |

That’s all the questions I have for you. Is there anything else you would like to say before we end?

Thank you so much for your time.

**Attachment B: Consent Form**

**USDA Food & Nutrition Service** **Characteristics and Circumstances of Zero Income SNAP Households**

**2012 Interview Consent Form**

*Public reporting burden for this collection of information is estimated to average 60 minutes per response, including the time for reading text, asking questions and providing consent. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to: U.S. Department of Agriculture, Food and Nutrition Services, Office of Research and Analysis, Room 1014, Alexandria, VA 22302 ATTN: PRA (\_\_\_\_-\_\_\_\_).*

**Purpose**. You have been selected to participate in a research study being conducted by the United States Department of Agriculture, Food and Nutrition Service. The purpose of the study is to learn more about the strategies that people receiving Supplemental Nutrient Assistance Program (SNAP) benefits use to cope when they have no income. We will be interviewing 50 SNAP (formerly known as food stamp) participants who live in parts of DC, Maryland, Virginia and West Virginia.

**Study Procedures.** Your State SNAP agency provided a list of SNAP participants who reported no income when applying or re-applying for SNAP benefits. We selected your name from that list by chance. The interview will take about 1 hour. It will include questions about who lives with you and how you manage to get by. Your responses to our questions will be recorded and sent to study headquarters where the information will be processed. Your name will be removed from the information you provide so that no one can identify you with your answers.

**Risks and Benefits.** Participation is this study is strictly voluntary and will not affect your SNAP benefits in any way, even if you decide not to participate in the interview or decide not to answer any particular questions. The information you provide will be kept confidential private and will not be disclosed to anyone in any identifiable form; except as otherwise required by law. The study findings will be used to help the SNAP program meet the needs of people like you. Some of the questions are of a personal financial nature. You will be given a $25 gift card for your time.

**Privacy.** All information collected during this study will be kept private by the individual field interviewers. The information is transferred onto secure computer systems at study headquarters. The information you provide will not be shared with your SNAP agency; rather the data will be put together with that from other respondents and analyzed in groups. Your information will not be identified individually in any way.

**Participant Rights.** The United States Department of Agriculture and the federal Office of Management and Budget have authorized this study to be carried out by Insight Policy Research. We look forward to your participation. If you have any questions about this study, you may contact the study director at Insight at 703-504-9480.

**Certification.** By signing this document, you are certifying that you have read this agreement and that you [CHECK ONE in each line]:

\_\_\_\_ agree/\_\_\_\_ disagree to participate in study

\_\_\_\_ agree/\_\_\_\_ disagree to have the interview recorded

Name [PRINT]: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_