Contract Number: AG-3198-D-10-0079/GS-10F-005 L

Mathematica Reference Number: 06843

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September 17, 2012

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A. JUSTIFICATION

A1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new information collection request. The Food and Nutrition Service (FNS), U.S. Department of Agriculture (USDA) is requesting Office of Management and Budget (OMB) approval to conduct the Study of the Effectiveness of Efforts to Improve Supplemental Nutrition Assistance Program Access Among Medicare's Extra Help Population Pilot Projects. The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act, 2010 (PL 111-80) provides FNS with funds to test the effectiveness of pilot projects designed to improve elderly access in the Supplemental Nutrition Assistance Program (SNAP). Historically, elderly individuals who are eligible for SNAP have the lowest participation rates among all demographic groups. The pilot projects will attempt to improve access to SNAP among beneficiaries of Medicare's Extra Help by using data from Extra Help applications that are forwarded to state Medicaid offices. Because Extra Help and SNAP eligibility requirements do not directly correspond, these pilot projects will evaluate methods of using these Medicaid data to improve access to SNAP among Extra Help beneficiaries.

FNS invited state agencies to submit grant applications (OMB Control Number: 0584-0512, which is currently under review at OMB) to use data

from the Extra Help program to reduce the barriers to SNAP participation experienced by Extra Help applicants. FNS is funding three pilot projects to address some of these challenges through three approaches: (1) targeted outreach in Washington, (2) simplified eligibility criteria in Pennsylvania, and (3) standardized SNAP benefits in New Mexico.

The overarching goal of the evaluation is to understand how the pilot programs operated; who they served; and the extent to which they generated any measurable effects on participation, cost, and SNAP benefits. As part of the evaluation, FNS will do the following:

- 1. Obtain a detailed description of each pilot project.
- Obtain a detailed description of the implementation process of each pilot project.
- 3. Assess the effect of each pilot project on SNAP participation among the target population.
- 4. Assess the effect of each pilot project on SNAP benefits.
- 5. Assess the federal, state, and local administrative costs of each pilot project, including both implementation and operational costs.
- Assess the overall pilot experience among SNAP participants and nonparticipants within the target group.
- 7. Assess the effect of each pilot project on SNAP case and payment errors.

- 8. Assess the sustainability of each pilot project and the prerequisites for statewide expansion, including describing administrative barriers that may hinder replication of the pilot projects.
- 9. Assess and compare the relative promise of alternative models.

The information collection being requested for this project is to address the assessment of overall pilot experience among SNAP participants and eligible nonparticipants (objective 6 above). In order to accomplish this, the evaluation will solicit feedback from participants and nonparticipants through a 20-minute telephone survey in English or Spanish (Appendix A-B) and through 60-minute focus groups (Appendix C-D) in order to better understand the client experience with SNAP in general and the pilot project more specifically. In pilot locations, the survey and focus group evaluation will also ask about respondents' impressions of the pilot initiative.

A2. Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This study will provide federal and state policymakers, as well as program administrators at these levels, with information on whether and to what extent the pilot projects have reduced the barriers to SNAP participation experienced by Extra Help applicants. The public data collected for this study will be used in conjunction with descriptive analyses about the pilot implementation in each site and with administrative data to describe the implementation of the pilots and the operations, impacts, and long-term prospects for the pilot models.

1. Overview of the Study Design

The information collection under this clearance request consists of a including client (Appendix A-B), SNAP survey participants and nonparticipants, as well as a series of focus groups (Appendix C-D). Understanding how clients perceive the activities associated with the pilot will provide important context to interpret any trends or impacts that may be attributed to the pilot. The survey sample will include 1,000 individuals in New Mexico, 2,000 in Washington, and 3,000 in Pennsylvania. The survey sample in each state will be split evenly between participants and nonparticipants and will be conducted in Spanish when necessary. Advance and follow-up letters in both English and Spanish can be found in Appendix H - O and S.

The survey will have some modules in common for both participants and nonparticipants and some modules tailored to respondents' participation status. The survey interviews will collect information on the application experiences of SNAP participants and nonparticipants who have applied for SNAP in the past; reasons for nonparticipation; and activities, messages, or program changes that the target population describes as influencing the participation decision.

To conduct the survey, the target population lists (the Medicare Improvements for Patients and Providers Act (MIPPA) list in Pennsylvania and

the Medicare Savings Program (MSP) participant list in New Mexico and Washington) will be provided by pilot states for both the pilot and comparison sites. The questionnaire will take 20 minutes on average, respecting stamina limitations among the elderly population that make up respondents, and will be administered by phone through the contractor's survey operations center. Respondents will receive \$25 as a token of our appreciation.

The telephone survey is expected to begin at least one year after implementation begins in each state, allowing time for the clients to receive the grantees' intervention, make a decision to apply or not apply for SNAP, and complete the application process if they decide to apply. Approaching the applicants within this time frame will allow data collection while their experiences are more easily recalled which may be an issue for some respondents. The survey period will begin in January 2013 and continue through November 2013.

Questions addressed to respondents in both pilot and comparison sites will provide information about how client perceptions vary by participation status and location. In both pilot and comparison areas, both SNAP participants and nonparticipants will be interviewed. In the pilot sites only, additional questions are included to understand the experience with the particular pilot model. Table A3.1 illustrates the types of questions asked of all respondents (demographics and food security), those asked of SNAP participants in both locations (application and participation experience), and

those asked of SNAP nonparticipants in both locations (SNAP knowledge and reasons for nonparticipation).

	Pilot Site		Comparison Site		
Survey Modules Administered	SNAP Participant	SNAP Nonparticipant	SNAP Participant	SNAP Nonparticipant	
Previous SNAP experience	Х	X	Х	Х	
Household food security	Х	Х	Х	Х	
Reasons for applying for SNAP	Х		Х		
SNAP application process	Х		Х		
Participation experience	Х		Х		
Knowledge of SNAP		Х		X	
Reasons for nonparticipation		X		X	
Experience with Extra Help pilot	Х	Х			

Table A3.1. Survey Topics by Location and Respondent Type

As a second data source for learning the client perspective, 11 focus groups will be conducted with SNAP nonparticipants in each pilot state. The focus groups will be 60-minute discussions with approximately 10 people in attendance at each group.

The focus group discussions will cover respondent attitudes toward SNAP, with particular focus on reasons for not currently participating (see Appendix C for the English protocol and Appendix D for the Spanish protocol). If relevant to the respondents in a group, questions about previous experiences applying for and using SNAP benefits will also be asked. The groups will be recruited two to four weeks in advance of the meeting date and conducted by two researchers from the contractor for FNS, Mathematica Policy Research. One person will lead the discussion while the other assists with taking notes and assisting respondents with their needs so that the group conversation can proceed without interruption. Participants in the focus groups will receive \$50 as a token of our appreciation.

A3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for of collection. adopting this means Also, describe anv consideration of using information technology to reduce burden.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. The use of improved technology has been incorporated into the data collection wherever possible to reduce the burden on respondents.

The contractor will conduct each data collection activity that places a burden on respondents using the data collection mode that (1) is most appropriate for answering research questions and (2) minimizes the burden. For the surveys, the primary data collection mode will be a computerassisted telephone interviewing (CATI) instrument (a computer survey in which an interviewer reads a script aloud and inputs the respondent's answers directly into the computer system). For the focus groups, the mode is an in-person group discussion.

Survey data collection. For the surveys, the primary data collection mode will be a 20-minute telephone interview conducted by an interviewer using a CATI instrument. This mode allows respondents who may become tired during the interview to participate in multiple sessions if they wish. Interviewers will also be flexible with sample members and schedule interviews for times that are convenient for them, including on weekdays, weekends, and evenings. The CATI instrument will also help interviewers

collect the data in a standardized, systematic way, as the programmed instrument will guide the interviewers through the questionnaire. Of the 6,138 responses (which includes focus groups and participants in the client survey), 6,000, or 98%, will be collected electronically, which represent all those participating in the client telephone survey.

• Focus group data collection. For the focus groups (138 participants), the mode is an in-person group discussion. This mode is most suitable to establishing rapport and trust needed to discuss reasons for not participating in a human services program such as SNAP. Because the mode is an in-depth, in-person discussion, technology will not be used to collect responses to questions; in this instance use of technology would not be practical. However the focus group discussions will be recorded to facilitate review of the content during analysis.

A4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There is no similar data collection available. 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 recognizes that certain information necessary to conduct a complete evaluation can be obtained from document reviews and administrative records.

A5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Data will not be collected from small businesses.

A6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The proposed data collection activity involves a one-time event with no

repetition of data collection planned. If this study is not conducted, FNS could

not evaluate the effectiveness of pilot projects designed to improve elderly

access to the SNAP Program as outlined in the Agriculture, Rural

Development, Food and Drug Administration, and Related Agencies

Appropriations Act, 2010 (PL 111-80).

A7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

 requiring respondents to report information to the agency more often than quarterly;

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

There are no special circumstances. The collection of information is

conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Consultation with the public. FNS published a notice in the Federal

Register on August 9, 2011 (Volume 76, Number 153, pages 48,798-48,799).

We received no comments that were relevant to this data collection.

Comments that were received, even though not relevant, are included in

Appendix E. Responses to the comments are also included in Appendix E.

Consultation with individuals. Throughout the evaluation, input is being solicited from individuals outside of FNS. The design of this study has proceeded through many stages which involved consulting with a range of individuals. We consulted with outside experts. Mark Nord at USDA-ERS (phone: 202-694-5433) reviewed the client survey and staff at the Statistics Division, NASS/USDA (phone: 202-690-0901) reviewed sampling and statistical methodologies for the National Agricultural Statistical Service.

A9. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

For the surveys, respondents will receive \$25 as a token of our appreciation. Nonrespondents for whom no valid telephone number can be found will be mailed a second letter (Appendix I & N) with a \$10 incentive to call to complete the survey and receive the additional \$25 incentive. Focus group participants will receive \$50 as a token of appreciation. These participants will be contributing an amount of time that exceeds that of survey participation. Additionally, unlike for the survey, focus group participants must also travel to the data gathering site. Thus, the incentive for focus group participants must be higher to stimulate participation (see Kreuger and Casey 2009; Stewart, Shamdasani, and Rook 2007).

The incentives being provided for participation in the data collection activities above are not reimbursements for respondents' time or burden on the respondents.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Confidentiality. Because of the sensitivity of questions related to food security, we submitted an application to Public and Private Ventures Institutional Review Board (application in Appendix P and approval in Appendix Q). The IRB has reviewed our procedures for protecting confidentiality and approved our study. (With the closure of Public and Private Ventures, we have transferred oversight of the project to the New England Institutional Review Board.)

The information collection will fully comply with all respects of the Privacy Act of 1974. Individuals and agencies will be subject to assurances and safeguards as provided by Section 934(c) of the Public Health Service Act of 1944, 42 USC 299c-3(c). Survey respondents and focus group participants will be told the purposes for which the information is being collected and that any identifiable information about them will not be used or disclosed for any other purpose, except under such circumstances as may be required by law. Respondents will be given this notification during recruitment in the advance letter (Appendix H & M) or in the focus group recruitment telephone call (Appendix F and Appendix S), which will also provide notice that information is being gathered for research purposes only. Respondents will be informed that participation is voluntary, that they may refuse to answer any question, and that they may stop their participation at any time.

No identifying information will be requested from participants. Names will not be linked to comments or responses. Data will be reported in aggregate

form. The contractor will safeguard all data and only authorized users will have access to the data. Information gathered for this study will be made available only to researchers authorized to work on the study.

A system of record notice (SORN) titled <u>FNS-8 USDA/FNS Studies and</u> <u>Reports</u> was published in the Federal Register on April 25, 1991, Volume 56, and beginning on page 19078, discusses the terms of protections that will be provided to respondents.

Data security. The contractor has a secure server for data collection utilizing its existing and continuously tested network infrastructure. This infrastructure features the use of secure and encrypted data communication; authentication (login and password) for access to study files; firewalls; and multiple layers of servers, all implemented on a mixture of platforms and systems to minimize vulnerability to security breaches.

The contractor has established data security plans for the handling of all data during all phases of survey execution and data processing for the surveys that it conducts. Its existing plans meet the requirements of U.S. federal government agencies and are continually reviewed in the light of new government requirements and survey needs. Such security is based on (1) exacting company policy promulgated by the highest corporate officers in consultation with systems staff and outside consultants, (2) a secure systems infrastructure that is continually monitored and evaluated with respect to security risks, and (3) secure work practices of an informed staff that take all necessary precautions when dealing with private data.

A11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The questions asked in the survey questionnaire and the focus group protocol largely do not involve questions of a sensitive nature. Respondents, however, may be reluctant to discuss reasons for participation or nonparticipation in SNAP or to provide data on food assistance receipt and household income. However, information on income and food assistance receipt are critical background characteristics both in that they define key subgroups of SNAP participants and nonparticipants and in that they are important control variables in the assessment of barriers to SNAP participation. Additionally, since a key objective of the study is to understand reasons for nonparticipation in SNAP so that barriers to nonparticipation can be addressed, these questions are critical in order to address the goals of the study. As described in section A10, respondents will be told that they can refuse to answer any question at any time and that their responses will not affect their eligibility or level of SNAP benefits.

A12. Provide estimates of the hour burden of the collection of information. The statement should:

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

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

Table A12.1 shows sample sizes and estimated burden for each part of

the data collection and for the overall data collection effort.

State	Respondent Type	Type of Instrument		Estimated Number of Responde nts	Frequen cy of Respons es	Total Responses	Time per Responde nt (Hours)	Annual Burden (Hours)
	SNAP participants	Survey questionnai re	Complet ed	1,606	1	1,606	0.36	578.16
WA	and eligible nonparticipa nts		Attempt ed	394	1	394	0.08	31.52
WA	Eligible nonparticipa	Focus group	Complet ed	50	1	50	1.03	51.50
VVA	nts		Attempt ed	13	1	13	0.08	1.04
	SNAP participants	Survey questionnai re	Complet ed	798	1	798	0.36	287.28
NM	and eligible nonparticipa nts		Attempt ed	202	1	202	0.08	16.16
NM	Eligible		Complet ed	40	1	40	1.03	41.20
NIM	nonparticipa nts		Attempt ed	10	1	10	0.08	0.80
	SNAP participants	Survey	Complet ed	2,399	1	2,399	0.36	863.64
PA	and eligible nonparticipa nts	questionnai re	Attempt ed	601	1	601	0.08	48.08
DA	Eligible	Focus group	Complet ed	20	1	20	1.03	20.60
PA	nonparticipa nts		Attempt ed	5	1	5	0.08	0.40
TOTA L				6,138*	1	6,138	.316126	1940.3 8
*Total in	*Total includes pilot burden, focus groups and client survey							

Table A12.1. Estimated Burden for Data Collection

Table A12.2 provides estimates of the cost burden by data collection activity and for the evaluation overall. The total cost burden is estimated to be \$14,242.40. Using FNS standards for income eligibility for SNAP, FNS estimates the average hourly wage rate of each respondent type.

		_	-	-		-		
State	Respondent Type	Type of Instrument		Estimated Number of Respondent S	Frequenc y of Respons es	Time per Responde nt (Hours)	Averag e Hourly Wage Cost ª	Total Hour Cost Burden
	SNAP participants	Survey	Complete d	1,606	1	0.36	\$7.34	\$4243.70
WA	and eligible nonparticipan ts	questionnai re	Attempte d	394	1	0.08	\$7.34	\$231.36
WA	Eligible nonparticipan	_	Complete d	50	1	1.03	\$7.34	\$378.01
WA	ts	Focus group	Attempte d	13	1	0.08	\$7.34	\$7.63
	SNAP participants	Survey	Complete d	798	1	0.36	\$7.34	\$2108.64
NM	NM and eligible nonparticipan ts	questionnai re	Attempte d	202	1	0.08	\$7.34	\$118.61
NM	Eligible nonparticipan	F	Complete d	40	1	1.03	\$7.34	\$302.41
INIM	ts	Focus group	Attempte d	10	1	0.08	\$7.34	\$5.87
	SNAP participants	Survey	Complete d	2,399	1	0.36	\$7.34	\$6339.12
PA	and eligible nonparticipan ts	questionnai re	Attempte d	601	1	0.08	\$7.34	\$352.91
PA	Eligible nonparticipan ts	Focus group	Complete d	20	1	1.03	\$7.34	\$151.20
ГА 			Attempte d	5	1	0.08	\$7.34	\$2.94
TOTA L				6,138	3			\$14,242. 40
*Total in	*Total includes pilot burden, focus groups and client survey							

Table A12.2. Estimated Average Hourly Wage of Each Respondent Type

^a Average hourly wage cost is based on the FNS gross income limits for a one-person household to be SNAP eligible. The hourly wage is therefore estimated by dividing this limit (\$1,174) by 160 hours, the standard number of full-time equivalent hours of work per month.

A13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs

associated with this information collection.

A14.Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The 48-month contract cost to the federal government for the implementation, data coding, preparation of raw data files, and analyses for this study is fixed price at \$2,718,407. Of that total, approximately \$1,219,033 will be for the client survey and focus group activities for an annual estimate of \$406,344. The period of performance for the project is October 1, 2010 through September 26, 2014.

This information collection also assumes that a total of 400 hours of Federal employee time: for a GS-14, step 10 Senior Analyst at \$65.75 per hour for a total of \$26,300 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2012. The total annualized cost (contract + FNS cost) is \$432,644 and the total project cost of the data collection and analysis is \$ 1,297,932.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new information collection request. This information collection will add 1,940 hours and 6,138 responses to the OMB Inventory.

A16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

1. Study Schedule

The planned schedule for data collection is described in Table A16.1.

Study Task	Start Task	Complete Task
Collection and Analysis of Implementation Data	12/2/2011	1/13/2012
Interim Report on Implementation	2/24/2012	4/6/2012
Recruitment and Training of Field Data Collectors and Interviewers	8/27/2012	10/31/2012
Collection and Analysis of Operational Data	10/5/2012	10/4/2013
Cost-Neutrality Analyses and Payment Errors Estimates	10/5/2012	12/20/2013
Collection and Analysis of Client Data	01/15/2013	11/30/2013
Issue Advance and Tribal Letters	01/15/2013	11/1/2013
Issue Follow-up Letters	01/28/2013	11/15/2013
Conduct Client Telephone Surveys	01/22/2013	11/30/2013
Issue Thank You Letters	01/21/2013	11/30/2013
Focus Group Recruitment Calls	01/15/2013	02/08/2013
Send Focus Group Reminder Letters	01/22/2013	02/11/2013
Conduct Focus Groups	01/28/2013	02/18/2013
Analyze Data	1/01/2014	5/1/2014
Preparation of Final Report	4/25/2014	9/26/2014
Develop Report	4/25/2014	08/26/2014
Submit report to FNS	8/26/2014	9/26/2014

Table A16.1. Planned Schedule for Data Collection

2. Analysis

The analyses that will be conducted for the survey and focus groups are

described below.

Client survey analysis. The survey data will be analyzed by comparing

and contrasting the following groups in the comparison and pilot sites on the

types of questions asked in the surveys:

- 1. All Extra Help applicants in the comparison sites and pilot sites will be compared on their responses to questions about previous SNAP experience and food security.
- Extra Help applicants who are SNAP participants in comparison sites will be compared to those in Pilot sites on questions about their reasons for applying for SNAP and their application and participation experiences.

- 3. Extra Help applicants who are not SNAP participants will be compared in comparison sites versus pilot sites on their knowledge of SNAP and reasons for nonparticipation.
- 4. Pilot site Extra Help applicants who are SNAP participants will be compared with pilot site Extra Help applicants who are nonparticipants on their previous SNAP experience, food security, and pilot experience.
- Comparison site Extra Help applicants who are SNAP participants will be compared with comparison site Extra Help applicants who are nonparticipants on their previous SNAP experience, food security, and pilot experience.

Analysis of the survey data will include producing simple descriptive statistics on pilot program experiences for Extra Help applicants in the pilot sites, as well as basic cross-tabulations for each of these comparisons. When sample sizes permit, results for specific subgroups of interest will also be examined, such as younger versus older Extra Help applicants and higherincome versus lower-income applicants.

Some Extra Help applicants will already be enrolled in SNAP at the time they submit their Extra Help application. The screener to the survey will try to ascertain their tenure on SNAP. This will enable differentiating between the perspectives and experiences of longer-term SNAP participants from those who enrolled during the demonstration. Depending on the size of the group, longer-term participants may be an additional analytical subgroup. The attitudes and experiences of this group will be compared to those of newly enrolled participants.

SNAP nonparticipant focus group analysis. The evaluation will use information learned from the focus groups to form an in-depth profile of SNAP nonparticipants with respect to their knowledge, attitudes, behaviors,

and experiences as they pertain to the SNAP application process. As presented above, a total of 11 focus group discussions will be conducted. The notes from the focus groups will be analyzed for any trends in participant responses and for whether responses were common among people sharing certain characteristics, such as previous SNAP experience, access to transportation, or education level.

After completing all analyses, a report will be created for review by FNS. The final report will then be placed on the FNS website for viewing by the public.

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The OMB expiration date will be displayed on all data collection materials.

A18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the certification.

REFERENCES

- Kreuger, Richard A., and Mary Anne Casey. *Focus Groups: A Practical Guide for Applied Research.* 4th ed. Thousand Oaks, CA: Sage Publications, 2009.
- Stewart, David W., Prem N. *Focus Groups: Theory and Practice.* 2nd ed. Thousand Oaks, CA: Sage Publications, 2007.