

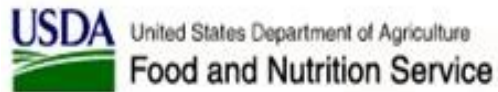
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**UNDERSTANDING THE RATES, CAUSES, AND COSTS OF CHURNING  
IN THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)**

**OMB CLEARANCE PACKAGE:  
SUPPORTING STATEMENT, PART A**

U.S. Department of Agriculture  
Food and Nutrition Service  
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# UNDERSTANDING THE RATES, CAUSES, AND COSTS OF CHURNING IN THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

## SUPPORTING STATEMENT

### A. JUSTIFICATION

- 1. 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 study—a new information collection—aims to improve understanding of the rates, causes, and costs of churning in the Supplemental Nutrition Assistance Program (SNAP) and to investigate policies and practices that might reduce churning and mitigate its costs to program agencies and clients.

In the context of dramatic recent growth in the SNAP caseload, increasing attention has focused on participant churning—the re-entry of cases after brief periods (four months or less) off the program. This on-off-on cycling is a major policy concern in terms of benefit loss to households who may have remained continuously eligible, the burden to them (in time and expense) of re-entering the program, and the administrative costs to program agencies associated with case closings and re-openings.

For the purposes of this study, two categories of SNAP churners are defined. The first (referred to here as “benefit-eligible churners”) consists of recipients who exit the program for reasons of procedural noncompliance at a time when they continue to meet income, resource, and other requirements. The second consists of recipients who are ineligible at exit but become eligible

again within a short period of time. An example of the first is someone who misses an interview or fails to file proper paperwork and whose SNAP benefit is terminated but whose income and other circumstances are unchanged. An example of the second is someone who exits SNAP due to increased earnings, but loses their job within a few months and re-enters the program as newly eligible. The first type is associated with costs for individuals in lost benefits (and potentially, insufficient nutritious foods) and additional administrative program costs. The second type is important more broadly as it relates to recipients' economic instability, even though no benefit loss has occurred.<sup>1</sup>

Section 17 [7 U.S.C. 2026] (a)(1) of the Food and Nutrition Act of 2008 provides general legislative authority for the planned data collection. This section authorizes the Secretary of Agriculture to enter into contracts with private institutions to undertake research that will help to improve the administration and effectiveness of SNAP in delivering nutrition-related benefits. The data collection will be conducted by the Urban Institute under contract to the Office of Research and Analysis, Food and Nutrition Service, U.S. Department of Agriculture.

**2. Indicate how, by whom, 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.**

The main research questions for this study are grouped into four categories, as listed in Exhibit A.1 and discussed individually below, followed by a brief overview of the quantitative and qualitative research design.

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<sup>1</sup> Other complex situations may arise where benefit issuance to a household is delayed upon approval of its recertification, due to delays in the agency acting on the case's expiring certification period. This would not be counted as churn, even though there is arguably a loss of benefits, as the household could not access its benefits for some number of days or weeks.



- **Determine rate and patterns of churning**

To understand the extent to which churning is an issue, to be able to estimate costs of churning, and as context for analyzing policies and practices that can mitigate churning, the study will first examine the rate and patterns of churning, including how many SNAP participant households experience churning and how frequently. Information collected, will be used by FNS to understand the causes of churn and to be able to develop and target solutions, it is also important to identify how rates of churn (including time off the program and frequency of churn) differ across household demographic characteristics, program eligibility groups, benefit levels, and other characteristics such as whether participants are working. Given differences in policies and practices, it is also important to explore whether churning differs across states and across regions or offices within states. Another question is the extent to which churning occurs at recertification versus other times.

- **Examine the causes and relevant factors associated with churning**

The second set of research questions examines the causes of and the factors associated with churning. Potential causes or correlates of churning include personal barriers or characteristics that may impede recipients' ability to comply with administrative procedures (including health issues, small children, household composition changes, work schedules, etc.). Operational practices in offices or SNAP policies may make it easier or harder for recipients to recertify or report status changes, including face-to-face or telephone interviews, office hours, on-line or telephone recertification or reporting, procedures and timing on reporting relevant status changes, or simplified reporting. These can impact exits of otherwise eligible recipients and

likewise lead to churning. In addition, a key hypothesis of the study is that the role of local community-based organizations (CBOs) is important to churning. Do those areas where CBOs can file SNAP applications have lower churn? The study will investigate the association of these factors to churning and examine variation in these associations across household types. The research will also explore stakeholders views on churning, including whether it is a major issue, the perceived causes, why cases fail to recertify, and how can churning be reduced.

- **Determine the process of churner re-entry**

The study also seeks to understand more about the process of re-entry for churners and how it may be different than a standard application process. For example, are these short-term SNAP leavers treated differently than new applicants, possibly having to provide less documentation or go through a shorter process? Does this depend on length of time off the program? Differences could have implications for estimates of the costs of churning. In addition, is there any action taken when participants fail to recertify for administrative reasons, but appear to be otherwise eligible? Is there any outreach to these households? Are there any differences in the action taken among types of households that fail to recertify? The study will explore whether the process of churner re-entry differs across states and within states by region or office.

- **Calculate the cost of churning**

Finally, the research will address questions about the cost of churning, both for participants and for programs. For participants, the cost of churning when still eligible is their benefit loss. For programs, a key factor is the administrative cost of closure and reapproval versus case



maintenance for the months between exit and re-entry. Estimating the extent to which participants that churn continued to be eligible for benefits after exit is an important element of this analysis. The study will use these cost estimates and the differences across states and areas with different policies to provide information on the state fiscal impact of waivers and options that are associated with lower churn.

The proposed approach to answering these research questions involves a combination of quantitative and qualitative analyses using multiple sources of data. For many of the questions the study will rely on multiple analysis methods, integrating the results across methods in the presentation of findings.

### ***Quantitative and Qualitative Data Collection Activities***

The ***quantitative analysis*** will rely on administrative microdata on SNAP participants in six selected states, linked with relevant policy and administrative variables. The six states will be chosen to reflect different SNAP policy choices and waivers (including use of CBO waivers) to allow comparison of results across policy environments. The study will also examine within-state differences in policy and practices and the association with churn. In one of the six states, the research will make use of additional linked microdata on earnings, from quarterly Unemployment Insurance wage records, to assess the income eligibility of churners during their period of benefit nonreceipt.

In addition to these quantitative analyses, the study will include *qualitative analysis* in six local sites, through interviews of SNAP program administrators, SNAP case workers, SNAP participants who have experienced churn, and representatives of CBOs. Program administrators and caseworkers will be asked to about the implementation of SNAP policies in the field, about potential reasons for churning related to administrative practices, about cherner re-entry (e.g., how re-applications are handled for cases that left SNAP within the last four months), and about the costs of churning. The caseworkers will also be key informants for interpreting the meaning of case closure codes in administrative data, as they typically enter this information. CBO representatives that help individuals access SNAP benefits can provide a different perspective than program staff on practices and policies that lead to churn. Recipients who have themselves churned can provide information on specific reasons for exiting that would not be listed in administrative data (such as difficulties navigating procedures due to health, language, or education deficits).

The data collection instruments to be used are as follows:

- Recruitment Script: Interviews (A-1)—To recruit respondents among administrators and staff of the state and local program agencies and community-based organizations.
- Reminder Script: Interviews (A-2)—To remind the recruited respondents of the date, time, and location of their interview.
- Introductory Script: Interviews (A-3)—To explain the interview objectives and procedures and to obtain consent from the respondent.
- Interview Guides: SNAP Administrator (A-4), SNAP Caseworker (A-5), and Community-Based Organization Director (A-6)—To collect from the interview respondents the substantive information necessary for the study.
- Recruitment Script: Focus Groups (B-1)—To recruit focus group participants from among SNAP householders identified as having recently churned.

- Reminder Script: Focus Groups (B-2)—To remind the recruited focus group participants of the date, time, and location of their focus group.
- Introductory Script: Focus Groups (B-3)—To explain the focus group objectives and procedures and to obtain consent from the participants.
- Focus Group Guide: SNAP Participants (B-4)—To collect from the focus group participants the substantive information necessary for the study.
- Focus Group Participant Information Form (B-5)—To obtain basic demographic information from each focus group participant.
- Focus Group Participant Receipt Form (B-6)—To provide documentation of the focus group participant having received their incentive payment.

Instruments A-1 through A-6 are provided in the separate Appendix A. Instruments B-1 through B-6 are provided in the separate Appendix B, including Spanish translations identified as Instruments B-1S through B-6S.

**3. 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 adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

To ensure that qualitative data collection activities produce comparable, complete, and high quality data, site visit transcripts, summaries, and other documents will be coded and analyzed using NVivo qualitative analysis software. Using NVivo will enhance the ability to ensure inter-coder reliability and to analyze the qualitative data systematically.

Systematic analyses of the qualitative data will allow identification of patterns and themes among the various groups of respondents and across the six sites. For example, the study team will analyze the extent to which respondents see personal barriers or characteristics as contributing to churning, and identify the specific mechanisms by which these may lead to

churning. The team will analyze whether the perspectives on this issue differ among the various stakeholder groups.

**4. 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 solely administers and monitors SNAP benefits. The information required for this study is not currently reported to State Agencies on a regular basis in a standardized form.

While existing research offers some evidence on patterns of SNAP churn, there has been no systematic effort to understand its underlying causes and its costs. This study will thus fill a key gap in the SNAP literature. The SNAP caseload dynamics literature provides some insight into the extent of churning in the SNAP program. The study will also benefit from information drawn from prior research on state efforts to modernize and streamline application and recertification procedures and to encourage overall program participation, as well as data collected by FNS on current state policies (USDA FNS 2010).

***Review of Evidence on Rates and Causes of SNAP Churn***

Three studies of SNAP caseload dynamics in the 1990s and early 2000s indicate that as many as 20 to 24 percent of exiting cases return to the program in three to four months. Using national survey data from the 2001-2003 Panel of the Survey of Income and Program Participation (SIPP), Cody et al. (2007, p. 63, 82) find that 61 percent of those who began participating in

SNAP in the panel period exited within one year. Of those leaving the program, 24 percent re-entered within 4 months. Rangarajan and Gleason (2001, p. 34) found similarly that of those leaving food stamps in Illinois in 1997, 22 percent re-entered within 4 months. Richburg-Hayes and Kwakye (2005, p. 38-39) use a slightly different definition of reentry—focusing on the time within which cases that have been off food stamps for two consecutive months return to the program. Over the 1993-2001 time period analyzed, 23 percent of cases that had been off food stamps for two consecutive months in Cuyahoga County, Ohio, began receiving food stamps within the following three months, compared to 16 percent in Miami-Dade County, 14 percent in Philadelphia County, and 6.5 percent in Los Angeles County.

All of the studies found higher rates of churning for children, women, and non-Hispanic Blacks (results varied for Hispanics and other minorities). Additional characteristics examined in some, but not all, of the studies, showed higher rates of churning for TANF recipients (SIPP and Illinois), cases without earnings (SIPP, Miami-Dade County, Los Angeles County), families without a high school graduate, non-citizens, and families with income below 50 percent of poverty (SIPP), and cases in urban areas (Illinois).

Studies that explore the factors discouraging recertification can also shed insight into the causes of churning. A 2004 ERS study of Food Stamp Program (FSP) Access (Bartlett et al. 2004, OMB control number 0536-0053) found that, of families leaving the program at recertification, 38 percent noted difficulties with the recertification process and requirements.

### ***Review of Evidence on Costs of Churn***

When an eligible family temporarily ceases SNAP participation, the family experiences costs in the form of lost benefits. The loss can be substantial, relative to family income, and may jeopardize the family's access to sufficient nutritious food. As noted above, the prior literature on SNAP churning suggests that more disadvantaged groups (such as TANF families, families without earnings, and families below 50 percent of poverty) are most likely to churn, suggesting a substantial impact from the missed months of participation.

If families returning to SNAP are required to follow additional application steps that would not be required if they were simply renewing existing coverage, then the family may experience additional costs in terms of the time necessary to obtain and submit the necessary documentation, and/or the costs associated with additional visits to the SNAP office such as transportation, child care, and forgone wages (Mills, Compton, and Golden 2011).

Churning also presents costs to the SNAP agency, as re-enrolling families is substantially more time consuming than renewing existing cases (Rosenbaum and Dean 2011, p. 58). Certain modernization efforts are specifically geared toward reducing the costs associated with churning—these include “revolving door” waivers that allow staff to reopen a case within 30 days of closure if the closing was as a result of insufficient documentation at recertification and the documentation was subsequently provided (Rowe et al. 2010, volume I, p. iii-iv). In reviewing

the success of its modernization efforts, administrators in Utah observed that there was substantial churning at recertification, with 40 percent of cases closing at recertification for not completing the process and 90 percent of those reapplying approved. Failure to submit a signature at recertification seemed to be the biggest challenge (Rowe et al, 2010, volume II, p. 132).

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

Information being requested or required has been held to the minimum required for the intended use. Two of the respondent categories relate to small businesses or other small entities. First, the community-based organizations engaged in SNAP outreach and application assistance will be non-profit small businesses, with 12 respondents interviewed (plus two others recruited but not interviewed). Second, to the extent that any of the SNAP agencies participating in the study are public agencies associated with populations of less than 50,000 (as might occur with a county welfare agency), these would be classified as small entities (small governmental jurisdictions). Of the six SNAP agencies involved in this data collection, FNS estimates that one will be a small entity, with 7 respondents interviewed (and one other recruited but not interviewed).

Burden will be minimized for these respondents by restricting the interview length to the minimum required, by conducting these interviews on-site, and by requiring no record-keeping or written responses.

**6. 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.**

This is a one-time data collection. If the study information is not collected, those responsible at the federal, state, and local levels for designing and implementing SNAP policies and procedures will not have the value of this research in making their decisions on matters affecting participant churn. To the extent that actions may be considered to mitigate the adverse consequences of churn on program participants and administering agencies, the evidence base available for these considerations will be limited. Additionally, to the extent that program decisions may have unintended consequences on participant churn, the level of understanding about these possible effects will be limited.

As the proposed collection of quantitative and qualitative information is not on a recurring basis, there is no issue to be addressed regarding the frequency of data collection.

7. **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

- 8. 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.**

In accordance with 5 CFR 1320.8(d), a 60-day notice soliciting comments was placed in the Federal Register. The notice (entitled “Understanding the Rates, Causes, and Costs of Churning in SNAP”) was published in the Federal Register on December 22, 2011 (76 FR 79648). The Food and Nutrition Service (FNS) received one comment which is included in this submission and action taken by the agency in response. FNS’ response is included in Appendix E.

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.**

The information has been reviewed by Eric Porter (202-720-3489) of the Methods Branch of USDA’s National Agricultural Statistics Service (NASS), with special reference to the statistical procedures. See the NASS comments in Appendix F.

- 9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

As a token of appreciation, a gift of \$30 will be provided to each focus group participant. In addition, light refreshments will be offered to the focus group participants. This approach was

effective in the Urban Institute's recent study of SNAP Modernization (Rowe et al. 2010), where local agencies and community-based organizations cooperated in recruiting focus group participants for 27 focus groups in 14 sites. The incentive gift will be provided immediately upon the completion of the focus group (for those who participate) or following the introductory explanation (for those choosing at that time not to participate). Those opting out will still receive the incentive so that the gift is not a coercion to participate, but it will be provided to them outside the room so that others are not encouraged to opt out.

Monetary gifts have been shown to increase overall response rates in differing modes of surveys and focus groups (Singer 2002). Some focus group participants may incur direct costs for attending the focus group, and consequently might not be able to participate without remuneration. The \$30 is a reasonable amount for any inconvenience and cost associated with participation in a focus group.

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

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports (Federal Register, April 25, 1991, 56 FR 19078) ) discusses the terms of protections that will be provided to respondents. Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the secure treatment of records, to the extent permitted by law, maintained by a Federal agency according to either the individual's name or some other identifier

Prior to the start of each interview and focus group session, the researchers will assure the respondents that the information provided will be kept private. Specifically, the respondents will not be quoted by name, and no names will be included in the summary reports to FNS. The information will not be shared with anyone other than the research staff assigned to the study, all of whom will be required to sign a confidentiality pledge. See Appendix C.

The following wording is included in the introductory script for the interviews (Appendix A-3) and will be read to all interview respondents:

“When we write our reports and discuss our findings, we will ensure that the information from all the people we spoke with cannot be traced back to those persons. No individual will be quoted by name. The goal is to find common themes across all the interviews, not to report the responses of any particular individual.”

Similarly, the following statement is included in the introductory script for the focus groups (Appendix B-3), which will be read before the start of each discussion group:

“Participation in this discussion group is **voluntary**, which means that you do not have to participate and you can decide not to answer any specific questions. There are **no consequences** for choosing not to participate or not to answer any question. . . .”

“The personal information you provide will be safeguarded and will not be shared with anyone outside the research staff working on the study, except as otherwise required by law. This includes **anything that can identify you** such as your name, address, or telephone number. Information is never repeated with the name of a participant in any

reports or in any discussions with program staff or FNS. When we write our reports and discuss our findings, information from all the people we speak with is put together and presented so that ***no one person can be identified***. Everyone who works on this project has signed a legal document stating they will not reveal any of your personal information and can be severely penalized if they do. We also ask that you respect the privacy of others in the group and ***not repeat anything you hear*** in this discussion outside the group.”

As noted earlier, all researchers will be required to sign a confidentiality pledge, to be distributed for signature at the mandatory interviewer training. At that training session, the interviewers will be reminded to:

- Maintain privacy at site debriefings and wrap-up meetings.
- Use discretion in public places when discussing interviews or focus groups with other research team members.
- Secure interview notes and schedules at all times.

This study is also under the purview of the Urban Institute’s Institutional Review Board (IRB). See Appendix D. 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 privacy 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 will be available from the Urban Institute.

The Urban Institute operates under rigorous procedures regarding the protection of sensitive data, consistent with its federal-wide assurance of compliance approved by the Office of Human Research Protections of the U.S. Department of Health and Human Services. A firewall monitors and evaluates all attempted connections from the Internet to the Urban Institute's public web servers and its private network. Up-to-date antivirus software runs on all desktop PCs and servers. A spam filter manages spam e-mail and checks for potential malware. The Urban Institute also maintains sensitive disks separate from non-sensitive disks on all its system servers. If sensitive data are stored on an individual PC, these data are encrypted or stored on removable storage media. The Institute's standard encryption software is PGP.

Arrangements for the appropriate transmission of sensitive data include the following:

- File transfer over secure electronic connections. This means the source system must be a trusted and recognized source for the data, and the means of transfer must be secure, such as an encrypted Internet session or a direct dialup connection to the Urban Institute.
- Delivery by secure, trackable means, such as FedEx, UPS, or registered US mail.
- Hand delivery by a cleared individual.

Once data are received, file protections and access controls are established to ensure that sensitive data are not accessible to anyone who is not explicitly authorized to use them. All storage media (diskettes, tape cartridges, CDs, internal and external hard drives) that hold sensitive data are explicitly labeled as such.

- 11. 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.**

There are no questions on any of the data collection instruments regarding race/ethnicity, disability, religious beliefs, sexual attitudes or behavior, or other matters commonly considered as private. Respondents will not be asked to provide their social security number or to disclose any specific information about their financial circumstances.

- 12. 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.**

Exhibit A.2 shows estimated burden of the information collection, separately for each instrument and summed for the entire study, by respondent type: State, Local and Tribal Government; Not-for-Profit Institutions; and Individuals/Households. The estimates of annualized hour burden are derived as follows.

The selection of six states to participate in the study will be based on the following criteria: level of technology used in SNAP administration, practices regarding assignment of certification periods and the use of simplified reporting, waivers received from FNS relevant to recertification, level of coordination of application and recertification procedures with Medicaid, involvement in program outreach of community-based organizations, state versus county administration, the SNAP participation rate (among those eligible), the availability of longitudinal linked administrative data between SNAP benefits and wages, urban/rural caseload composition, and regional location. The selected states will encompass a range of variation on such characteristics. Within each participating state, a local office will be selected as the site for interviews and focus groups. At each of the six sites where on-site data collection is undertaken, interviews will be conducted with (on average) two SNAP administrators, five SNAP caseworkers, and two directors of community-based organizations. The interview guides are shown in Appendices A-4, A-5, and A-6, respectively. Each respondent will be interviewed once, and interviews are assumed to require 60 minutes. This estimated interview length is consistent with the results of the pre-test. For each type of interview, a common recruitment script (Appendix A-1), reminder script (Appendix A-2), and introductory script (Appendix A-3) will be used, with estimated lengths of 9 minutes, 6 minutes, and 5 minutes, respectively. Over-

recruitment is assumed for all three respondent types: 17 percent (2/12) for SNAP administrators, 20 percent (6/30) for SNAP caseworkers, and 25 percent (3/12) for CBO directors. The burden estimates for introductory scripts and interview guides include the pre-test interviews: two with SNAP administrators, three with SNAP caseworkers, and one with a CBO director.

Each participating state will be asked to provide a state-wide administrative dataset that contains de-identified case-level data on SNAP participation from January 2010 to the most recent available month. The time burden for complying with this request is assumed to be 100 hours per state.

For one of the participating states, an administrative dataset will be provided containing de-identified case-level data for cases that have churned since January 2010, including linked data on quarterly earnings from unemployment insurance wage records. This linked data set will be provided by a research institution that has partnered with the state under a prior data sharing agreement. For this research institution, the associated time burden is estimated to be 40 hours.



**Exhibit A.2: Estimated Burden in Annualized Hours and Costs**

Respondent Type	Instrument	Sample Size	Responsive					Non-Response					Total Burden Hours
			Number of	Percent of Respondents	Total Annual	Avg. Hours per Response	Total Annual Burden	Number of	Freq. of Response	Total Annual	Avg. Hours per	Total Annual Burden	
State Government	Recruitment script--SNAP administrators (A-1)	16	14	1	14	0.15	2.1	2	1	2	0	0	2.1
State Government	Reminder script--SNAP administrators (A-2)	12	12	1	12	0.1	1.2	0	1	0	0	0	1.2
State Government	Pre-test Introductory script--SNAP administrators (A-3)	2	2	1	2	0.08	0.16	0	1	0	0	0	0.2
State Government	Pre-test Interview guide--SNAP administrators (A-4)	2	2	1	2	1	2	0	1	0	0	0	2.0
State Government	Introductory script--SNAP administrators (A-3)	14	12	1	12	0.08	0.96	2	1	2	0	0	1.0
State Government	Interview guide--SNAP administrators (A-4)	14	12	1	12	1	12	2	1	2	0	0	12.0
State Government	Recruitment script--SNAP caseworkers (A-1)	36	36	1	36	0.15	5.4	0	1	0	0	0	5.4
State Government	Reminder script--SNAP caseworkers (A-2)	36	30	1	30	0.1	3	6	1	6	0	0	3.0
State Government	Pre-test Introductory script--SNAP caseworkers (A-3)	3	3	1	3	0.08	0.24	0	1	0	0	0	0.2
State Government	Pre-test Interview guide--SNAP caseworkers (A-5)	3	3	1	3	1	3	0	1	0	0	0	3.0
State Government	Introductory script--SNAP caseworkers (A-3)	36	30	1	30	0.08	2.4	6	1	6	0	0	2.4
State Government	Interview guide--SNAP caseworkers (A-5)	36	30	1	30	1	30	6	1	6	0	0	30.0
State Government	Administrative data request—agency data staff	6	6	1	6	100	600	0	1	0	0	0	600.0
Not-for-Profit Institutions	Recruitment script--CBO directors (A-1)	15	15	1	15	0.15	2.25	0	1	0	0	0	2.3
Not-for-Profit Institutions	Reminder script--CBO directors (A-2)	15	12	1	12	0.1	1.2	3	1	3	0	0	1.2
Not-for-Profit Institutions	Pre-test Introductory script--CBO directors (A-3)	1	1	1	1	0.08	0.08	0	1	0	0	0	0.1
Not-for-Profit Institutions	Pre-test Interview guide--CBO directors (A-6)	1	1	1	1	1	1	0	1	0	0	0	1.0
Not-for-Profit Institutions	Introductory script--CBO directors (A-3)	15	12	1	12	0.08	0.96	3	1	3	0	0	1.0

Respondent Type	Instrument	Sample Size	Responsive					Non-Response					Total Burden Hours
			Number of	Percent of Response	Total Annual	Avg. Hours per Response	Total Annual Burden	Number of	Freq. of Response	Total Annual	Avg. Hours per	Total Annual Burden	
Not-for-Profit Institutions	Interview guide--CBO directors (A-6)	15	12	1	12	1	12	3	1	3	0	0	12.0
Not-for-Profit Institutions	Administrative data request—research institution data staff	1	1	1	1	40	40	0	1	0	0	0	40.0
Individual/Households	Recruitment script--focus groups (B-1)	160	120	1	120	0.15	18	40	1	40	0	0	18.0
Individual/Households	Reminder script--focus groups (B-2)	88	80	1	80	0.1	8	8	1	8	0	0	8.0
Individual/Households	Pre-test Introductory script--focus groups (B-3)	3	3	1	3	0.08	0.24	0	1	0	0	0	0.2
Individual/Households	Pre-test Focus group guide--SNAP participants (B-4)	3	3	1	3	1.5	4.5	0	1	0	0	0	4.5
Individual/Households	Pre-test Focus group participant information form (B-5)	3	3	1	3	0.05	0.15	0	1	0	0	0	0.2
Individual/Households	Pre-test Focus group participant receipt form (B-6)	3	3	1	3	0.02	0.06	0	1	0	0	0	0.1
Individual/Households	Introductory script--focus groups (B-3)	120	60	1	60	0.08	4.8	60	1	60	0	0	4.8
Individual/Households	Focus group guide--SNAP participants (B-4)	120	60	1	60	1.5	90	60	1	60	0	0	90.0
Individual/Households	Focus group participant information form (B-5)	120	60	1	60	0.05	3	60	1	60	0	0	3.0
Individual/Households	Focus group participant receipt form (B-6)	120	60	1	60	0.02	1.2	60	1	60	0	0	1.2
<b>Total (unduplicated counts)</b>		<b>201</b>	<b>201</b>	<b>1</b>	<b>698</b>	<b>1.22</b>	<b>849.9</b>	<b>71</b>	<b>1</b>	<b>321</b>	<b>0</b>	<b>0</b>	<b>849.9</b>

At each site, two focus groups will be conducted with SNAP participants. Each group is assumed to include five participants. The focus group guide is shown in Appendix B-4. The participants will be recruited by telephone. An assumed 120 recruitment calls will be required, each taking 9 minutes (Appendix B-1). Those who agree to participate will receive a reminder call in advance of the scheduled date, each taking 6 minutes (Appendix B-2). The focus group sessions will last 90 minutes, preceded by a 5-minute introductory script (Appendix B-3). All focus group attendees will complete a participant information form, requiring 3 minutes (Appendix B-5), and a participant receipt form, requiring 1 minute (Appendix B-6). The burden estimates for the introductory script and focus group guide include pre-test interviews with 3 SNAP participants.

The total (unduplicated) number of respondents, including the pre-test, is 201. The total number of responses is 698. The estimated annualized hour burden is 849.95 hours. There is no record-keeping burden associated with any of these information collection activities.

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

The two right-most columns of Exhibit A-2 show hourly wage rate and annualized cost to respondents (burden hours multiplied by the wage rate) for each data collection instrument. For SNAP administrators, and directors of CBOs, the assumed hourly wage rate (\$30.43) is the mean hourly wage for “Social and Community Service Managers”, based on the most recent data (May 2011) from the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes119151.htm>).

Workers in this occupational category (11-9151) are classified as having the following responsibilities: “Plan, direct, or coordinate the activities of a social service program or

community outreach organization. Oversee the program or organization's budget and policies regarding participant involvement, program requirements, and benefits. Work may involve directing social workers, counselors, or probation officers.”

For SNAP caseworkers the assumed hourly wage rate (\$19.95) is the mean hourly wage for “Eligibility Interviewers, Government Programs”, based on the most recent data (May 2011) from the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes434061.htm>). Workers in this occupational category (43-4061) are classified as having the following responsibilities: “Determine eligibility of persons applying to receive assistance from government programs and agency resources, such as welfare, unemployment benefits, social security, and public housing.”

For the data staff from state agencies and research institutions the assumed wage rate (\$36.54) is the mean hourly wage for “Computer Programmers”, based on the most recent data (May 2011) from the Bureau of Labor Statistics (<http://www.bls.gov/oes/current/oes151131.htm>). Workers in this occupational category (15-1131) are classified as having the following responsibilities: “Create, modify, and test the code, forms, and script that allow computer applications to run. Work from specifications drawn up by software developers or other individuals. May assist software developers by analyzing user needs and designing software solutions. May develop and write computer programs to store, locate, and retrieve specific documents, data, and information.”

For the focus group participants, the assumed hourly wage rate (\$14.40) equates to annual earnings of \$29,952 for a worker employed full-time year-round. This earnings amount corresponds to 130 percent of the 2012 federal poverty income guideline for a household of four

persons, the gross income standard for SNAP eligibility for a household of this size. (For reference, this assumed wage rate is somewhat less than twice the federal minimum wage of \$7.25 per hour.)

The estimated total annualized cost burden to respondents is \$27,231.

- 13. 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.

- 14. 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 total cost to the federal government of implementing the data collection activity, including the costs of analyzing, evaluating, summarizing, and reporting on the collected information, is \$780,785. This is the amount of the contract award to the Urban Institute for a 36-month period of performance (8/23/11 to 8/22/14). The corresponding annualized cost is \$260,262.

In addition, Federal staff time to direct the work is estimated at roughly 50 hours per year for a GS-15 Supervisory Program Analyst (\$61.28 per hour -- \$3,064) and 100 hours per year for a GS-13 Social Science Research Analyst (\$42.66 per hour -- \$4,266) The annualized federal salary cost of the data collection is thus \$7,330. This includes:

- Employee labor and materials for collecting the information;

- Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information;
- Employee labor and materials for developing, printing, storing forms;
- Employee labor and materials for developing computer systems, screens, or reports to support the collection; and
- Employee travel costs.

The total annualized cost to the federal government, combining contractor costs and federal staff salary costs, is \$267,592.

**15. 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 effort that will add 849.95 burden hours to the OMB inventory as a result of program changes.

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

The calendar schedule for the data collection activities is as follows:

- The instrument pre-test has taken place during March-April 2012.
- The administrative data files from the six participating states will be assembled by February 2013.
- Interviews and focus group activities will be conducted during January-May 2013, including recruitment calls, reminder calls, and the interviews and focus group sessions.

Findings from analysis of the information assembled through administrative data collection and on-site interviews and focus groups will be presented by the research contractor in a series of final deliverables, as follows:

- The draft final report will be submitted in April 2014.
- A briefing at FNS will be conducted in May 2014.
- The final report will be submitted in September 2014.

The final report will synthesize the quantitative and qualitative research. It will include an executive summary and sections devoted to study background, research questions, methods, major findings, and conclusions. Appendices will present technical details on site selection, data collection, and data analysis. This report may be publically disseminated under the SNAP Studies series, posted online by FNS' Office of Research and Analysis (<http://www.fns.usda.gov/Ora/menu/Published/SNAP/SNAP.htm>).

The findings will also be presented in research briefs posted on the Urban Institute's external website ([www.urban.org](http://www.urban.org)) and will likely be submitted for publication in peer-reviewed professional journals such as the Journal of Policy Analysis and Management ([http://onlinelibrary.wiley.com/journal/10.1002/\(ISSN\)1520-6688](http://onlinelibrary.wiley.com/journal/10.1002/(ISSN)1520-6688)).

**17. 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.

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

There are no exceptions to the certification.

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