

**U.S. DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE**

***Enhancing Completion Rates for SNAP
(Supplemental Nutrition Assistance Program) Quality Control Reviews***

*Request for Clearance
Supporting Statement and
Data Collection Instruments*

*Attachment C.3:
Resolutions to the Review by the
USDA National Agricultural Statistics Service (NASS)*

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September 26, 2013

ATTACHMENT C.3: RESOLUTIONS TO THE REVIEW BY THE USDA NATIONAL AGRICULTURAL STATISTICS SERVICE (NASS)

On June 14, 2013, the USDA National Agricultural Statistics Service (NASS) provided a review of this request for OMB clearance for the study, “Enhancing Completion Rates for SNAP Quality Control Reviews” (see Attachment C.1). Our memorandum in response to this review is provided in Attachment C.2, and a conference call was held on July 10, 2013 between NASS, FNS, and Insight to discuss the review and our response. This document summarizes the resolutions reached during that discussion and is organized according to the themes presented in our response memo in Attachment C.2: 1) areas of agreement, 2) responses to questions posed in the review, and 3) areas of misunderstanding.

1) Areas of Agreement

We agreed with the reviewer that the language describing the justification for the study could be clarified and we revised sections A.1 and A.2 of the Supporting Statement accordingly. These revisions included framing the study more explicitly as an exploratory, descriptive study, utilizing primarily qualitative methods. Additionally, we deemphasized the trends in completion rates and the discussion of the QC system’s random sample to avoid any misconception that the current study is a quantitative study including trend analysis or measurement of bias or validity.

We agreed with the reviewer that staff who have recently left their positions should not be included in the study frame and removed any reference to their inclusion.

2) Responses to Specific Questions

In response to questions regarding whether the re-review portion of the study is adequately covered under previous OMB approval, we included Attachment F to provide additional information and justification, as approved by FNS.

Additionally, we incorporated burden estimates for State SNAP QC office personnel for extracting the extant administrative data.

3) Areas of Misunderstanding

This section of our response memo addressed several areas where we believed the NASS reviewer may have misunderstood various aspects of the study, its purposes, and its methods, or may have been unfamiliar with the SNAP QC review process. These issues were discussed at length during our July 10 teleconference and we came to a different agreement and mutual understanding on the issues.

Concerns about the random sample were addressed by clarifying that the current study does not involve the QC system’s random sample or an analysis of trends in completion rates; rather, this information on the QC process and completion rates was provided as background information on factors that motivated the current study. Similarly, we came to the understanding that the current study does not

seek to measure bias or validity, but rather to learn about the QC processes at the State and Regional levels, particularly as they relate to incomplete cases, and to identify possible promising practices regarding QC completion rates. Each of these concerns has been further addressed by the revisions to sections A.1 and A.2 discussed above that emphasize the exploratory, descriptive, and primarily qualitative nature of the study.

Finally, we addressed the reviewers' concerns about the qualitative data collection instruments during our discussion by explaining the ways in which these types of qualitative data are typically gathered and analyzed and how they differ from quantitative survey analysis. As the reviewer was previously unfamiliar with qualitative research methods, this discussion assuaged his concerns and we agreed no further action or revision was necessary.