

Memorandum

Date: July 22, 2014

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

Through: Lynnette Thomas, Branch Chief, Planning and Regulatory Affairs Office and Ruth Brown, Department Clearance Officer, Office of Chief Information Office

From: Sangeetha Malaiyandi, Office of Policy Support
USDA – Food and Nutrition Service

Re: Under Approved Generic OMB Clearance No. 0584-0524
Request Approval to Perform Research on the Feasibility of Implementing the Supplemental Nutrition Assistance Program (SNAP) in the Commonwealth of the Northern Mariana Islands (CNMI)

The Food and Nutrition Service (FNS) of the USDA is requesting approval for formative research under Approved Generic OMB Clearance No. 0584-0524.

This request is to acquire clearance to conduct qualitative research on the feasibility of operating the Supplemental Nutrition Assistance Program (SNAP) in the Commonwealth of the Northern Mariana Islands (CNMI). The information collected will be critical for the USDA to effectively comply with Section 4031 of the Agricultural Act of 2014 (P.L. 113-79). This package addresses research that will examine the CNMI's capacity to administer SNAP in a manner similar to the way that States currently administer the program; identify specific modifications to current SNAP requirements (e.g., program operation and benefit delivery) that would need to be made for a comparable program design; and describe the barriers to implementing SNAP or an alternative model. Specifically, FNS seeks to conduct semi-structured qualitative interviews with participants in the CNMI's current Nutrition Assistance Program (NAP) and authorized NAP retailers in the CNMI. This package includes final versions of the participant and retailer interview protocols, participant and retailer consent forms, advance letter and recruitment materials, and a privacy pledge completed by all study team members.

The following information is provided for your review:

1. **Title of the Project: Assessing the Feasibility of Implementing SNAP in the Commonwealth of the Northern Mariana Islands (CNMI)**
2. **Control Number:** 0584-0524, Expires 06/30/2016
3. **Affected Public:** Individuals/Households, Retailers, and a Community-Based Organization (CBO)
 - Individuals from households participating in NAP
 - Retailers who are authorized to redeem NAP benefits
 - One CBO that has agreed to assist the study team by recruiting NAP participants and scheduling interviews
4. **Number of Respondents:**

Targeted respondent groups include 40 NAP-certified retailers, 20 current NAP participants, and one CBO staff member who will assist with recruiting and scheduling NAP participant interviews.

The total estimated number of respondents is 57. This includes 36 NAP-certified retailers (assuming a 10 percent nonresponse rate from 40 targeted retailers), 20 current NAP participants (assuming 100 percent of the targeted 20 participants will complete interviews), and 1 staff member from a CBO in the CNMI, who has agreed to assist with recruiting NAP participants and scheduling interviews for the study.

Number of Respondents

| Respondent Type | Number of Persons |
|--------------------------|--------------------------|
| Current NAP Participants | 20 |
| NAP-Certified Retailers | 36 |
| CBO Staff | 1 |
| <i>Total</i> | 57 |

5. Time Needed Per Response:

Estimates of time needed per response for both NAP participants and retailers include time to review the advance letter and study information sheet, schedule the interview during follow-up communications, and complete the interview. Estimates of time needed per response for CBO staff include assisting with NAP participant recruitment and interview scheduling.

Time Needed Per Response

| Respondent Type | Time (minutes) | Time (hours) |
|---------------------------------|-----------------------|---------------------|
| Current NAP Participants (n=20) | 70 | 1.16 |
| NAP-Certified Retailers (n=36) | 70 | 1.16 |
| CBO Staff (n=1) | 960 | 16 |

6. Total Burden Hours on Target Audiences:

| Target Audience | Instrument/Task | Number of Respondents | Freq. of Response (annual) | Total Annual Response | Avg. Hours per Response | Total Annual Burden |
|---------------------------|--|------------------------------|-----------------------------------|------------------------------|--------------------------------|----------------------------|
| Current NAP participants | Advance letter/study information sheet | 20 | 1 | 20 | 0.08 | 1.6 |
| Current NAP participants | Follow-up/scheduling communications | 20 | 1 | 20 | 0.08 | 1.6 |
| Current NAP participants | In-person interview | 20 | 1 | 20 | 1 | 20 |
| <i>Sub-Total I/H</i> | | 20 | 3 | 60 | 0.387 | 23.2 |
| CBO | Assist with NAP participant recruitment and interview scheduling | 1 | 1 | 1 | 16 | 16 |
| NAP-Certified retailers | Advance letter/ study information sheet | 40 | 1 | 40 | 0.08 | 3.2 |
| NAP-Certified retailers | Follow-up/scheduling communications | 40 | 1 | 40 | 0.08 | 3.2 |
| NAP-Certified retailers | In-person interview | 36 | 1 | 36 | 1 | 36 |
| <i>Sub-Total Business</i> | | 41 | 2.854 | 117 | 0.499 | 58.4 |
| <i>Total</i> | | 61 | 2.902 | 177 | 0.461 | 81.6 |

7. Project Purpose, Methodology, and Formative Research Design:

Background

Section 4031 of the Agricultural Act of 2014 (P.L. 113-79) requires a study to determine the feasibility of operating SNAP in the CNMI. It requires an examination of the CNMI's capacity to administer SNAP in a manner similar to the way that States currently administer the program; identification of specific modifications to current SNAP requirements (e.g., program operation and benefit delivery) that would need to be made for a comparable program design; and a description of the barriers to implementing SNAP or an alternative model.

The CNMI currently administers its NAP with funding from a Federal block grant. While the block grant provides limited funding, it grants the CNMI flexibility in administering its NAP (such as providing coupons to participants, determining eligibility rules, and establishing benefit levels). Currently, the block grant differs from SNAP in several important respects: 1) the block grant is capped each year at an amount that is negotiated annually with USDA; 2) benefit levels may be reduced to ensure that program costs do not exceed the authorized funding levels; 3) 30 percent of all NAP benefits must be used for the purchase of local commodities; and 4) NAP benefits are issued in the form of coupons rather than through EBT. Additionally, unlike State SNAP agencies, which share 50 percent of the administrative costs with the United States, 100 percent of the CNMI's administrative program costs are funded by the grant.

Project Purpose

The main goal of this study is to assess the capabilities of the CNMI to operate the SNAP and to assess alternative models of SNAP program operations and benefit delivery that best meet the nutrition assistance needs of individuals in the CNMI. Specifically, this study will assess the administrative, financial, technical, and other changes that would be necessary to implement SNAP (or a SNAP-like program) and describe potential barriers to implementing those changes. Capabilities that will be examined include establishing and operating an eligibility and certification system, issuing benefits through EBT cards, maintaining program integrity, and running an employment and training program.

Methodology/Research Design

This study will employ semi-structured in-depth interviews with NAP-certified retailers and current NAP participants. In-depth interviews will allow a skilled interviewer to probe for additional details about retailer and participant experiences, and collect qualitative information that cannot easily be collected based on a brief telephone survey. Interviews will be conversational in format, will take place in person, and will last approximately one hour each. The purpose of these interviews is to develop a full understanding of how NAP is implemented in the local communities, potential barriers to the implementation of SNAP, and how a transition to SNAP might affect the community.

The data collection instruments were pretested with two NAP participants and three retailers to determine whether questions were written appropriately and captured data most relevant to the research questions and objectives. The feedback was then used to refine and finalize the data collection instruments included in this package for OMB clearance.

We expect to bring bilingual interviewers to any interview that will not be conducted in English, so they can serve as translators as needed. These interviewers will be provided with the training materials in advance of the visit and will participate in an interviewer training prior to attending

interviews. Our initial introductory visit to the CNMI indicated that most NAP participants speak English, although some retailer interviews may need to be conducted in Chinese. Translators will be recruited through the assistance of a CBO or through a translation contractor used by the CNMI Department of Community and Cultural Affairs, the agency that administers NAP.

With permission of the interview respondents, all interviews will be recorded. In the event a respondent is not comfortable with recording the interview, each interview will be conducted by a two-person study team, so that one person is available to lead the interview while the other person takes detailed notes.

Participation in interviews is voluntary and there are no penalties if participants choose not to respond to a specific question or in whole. Participants will be informed that their information will be kept private and only used for research purposes unless otherwise required by law.

The interview protocol for NAP-certified retailers is located in Attachment A, and the interview protocol for current NAP participants is located in Attachment B. Consent forms for these groups are located in Attachments C and D, respectively. Attachment E includes the advance letters and study information sheets provided to respondents during recruitment.

Payments/Gifts to Respondents

NAP participants and NAP-certified retailers will be offered a \$20 gift card as an appreciation for their time. The payment is consistent with the amount used in other studies of persons participating in food assistance programs. One such example for FNS was a \$20 gift card provided to those who participated in-person interviews covering some similar topics—including household income, family composition, and eligibility—among participants in the Supplemental Nutrition Program for Women, Infants, and Children (WIC) in 2009 (OMB Control number 0584-0484, expired 6/30/2012).

One local CBO that has agreed to assist the study team with recruiting NAP participants and schedule the in-person interviews will be offered a \$200 incentive as an appreciation for their time and assistance.

Design/Sampling Procedures

No sampling will be used to select respondents for the NAP participant interviews. Twenty current NAP participants will be recruited with the assistance of a CBO in the CNMI, which has already agreed to assist with recruiting interview participants and scheduling interviews. The CBO will provide potential study participants with an advance letter and study information sheet to describe the purpose of the study and request their participation in an interview.

NAP-certified retailers will be identified from a list of all certified retailers provided by NAP staff in the CNMI. The study aims to interview 40 retailers from the universe of approximately 120 total retailers. Retailers will be contacted by the CBO and mailed an advance letter and study information sheet. The study team will then follow-up with retailers to arrange the interviews.

NAP participants and retailers will be selected from each of the three permanently inhabited islands in the CNMI, including Saipan, Tinian, and Rota.

Data Analysis

All interviews will be transcribed and, if needed, translated into English. Verbatim transcripts of each interview will be imported into NVivo qualitative software and coded using a standard coding scheme for each interview type. Data from the interviews will be analyzed as a whole to determine patterns among the group. The findings from the analysis will be reported in a final published report, which will be available to the public.

Outcome

The results from the interviews will be presented alongside results from document and literature reviews, meetings with FNS SNAP officials, and analyses of available U.S. Census data and administrative cost data to assess the overall feasibility of implementing SNAP in the CNMI. In particular, these interviews will help to identify the changes that would have to occur to transition from NAP to SNAP, inform the potential barriers to the implementation of SNAP, and describe potential impacts such a transition might have on the local community.

8. Privacy:

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 private treatment of records maintained by a Federal agency according to either the individual's name or some other identifier. A System of Record Notice (SORN), titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991, Volume 56, Pages 19078-19080, discusses the terms of protections that will be provided to respondents.

All interview respondents participating in the study will be told that any information they provide will be kept private and their participation will have no impact on their receipt of NAP benefits (for participants) or their status as a NAP-certified retailer (for retailers). Interviewees will also be told that no individually identifiable information will be included with any response and the key that links any response to any individual will be maintained in a locked file (hard copy) or encrypted (computer file) and destroyed at the conclusion of the study pursuant to USDA regulations.¹

All data collection staff are required to sign a data privacy pledge associated specifically with this study (Attachment F). A copy of the consent forms that will be read to NAP retailers and participants detailing the privacy of the data are provided in Attachments C and D, respectively. Respondents will be provided oral and written notification that their data will be treated as private and released to the public only in the form of aggregate study findings.

9. Federal Costs:

The total cost to the Federal Government for this feasibility study is \$1,990,930. This total includes the cost of design, instrument development, printing/processing/maintaining forms, information collection, transcription, coding, analysis, reporting, and presentation/publication of the results.

10. Research Tools/Instruments:

- Attachment A: NAP-Certified Retailer Interview Protocol
- Attachment B: NAP Participant Interview Protocol
- Attachment C: NAP-Certified Retailer Consent Form
- Attachment D: NAP Participant Consent Form
- Attachment E: Advance Letters and Study Information Sheets
- Attachment F: Privacy Pledge

¹ See <http://www.fns.usda.gov/foia/reading/systems-of-records.pdf> USDA/FNS-8: FNS Studies and Reports.

