

**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*

*Part A: Justification*

Project Officer: Robert Dalrymple

**September 26, 2013**

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- ATTACHMENT A.1B: STATE STUDY INFORMATION SHEET
- ATTACHMENT A.2: STATE SNAP QC DIRECTOR EMAIL
- ATTACHMENT A.3A: STATE QC DIRECTOR/SUPERVISOR SEMI-STRUCTURED INTERVIEW PROTOCOL
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## **PART A: JUSTIFICATION**

### **A.1. CIRCUMSTANCES THAT MAKE DATA COLLECTION NECESSARY**

**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. Legal authority 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. It authorizes the Secretary of the U.S. Department of Agriculture (USDA) to enter into contracts with private institutions to undertake research that will help to improve the administration and effectiveness of the Supplemental Nutrition Assistance Program (SNAP) in delivering nutrition-related benefits.

The SNAP Quality Control (QC) system requires States to conduct monthly quality control reviews of households participating in SNAP to assess the validity of SNAP cases and, ultimately, the payment error rate for SNAP. The completion rate of sampled QC reviews has decreased nationally over the last few decades. Although the completion rate has increased somewhat in recent years, it has not returned to previous levels and remains below the targeted levels by FNS. Completion rates vary considerably among States as well.

In response to this overall decline and inter-State variation in SNAP QC completion rates, the current study seeks to identify the factors associated with incomplete QC reviews in active SNAP cases and to identify best practices related to completing SNAP QC reviews. This exploratory, descriptive study assesses the processes by which QC reviews of active SNAP cases are conducted at the State and regional levels. The research will utilize a mixed methods design that relies heavily on qualitative data collection.

USDA's Food and Nutrition Service (FNS) is requesting Office of Management and Budget (OMB) approval to collect information from State SNAP offices and staff, including QC directors, QC supervisors, and QC reviewers. This information will be gathered through four instruments: a semi-

structured interview protocol for QC directors and supervisors (up to 18 interviews), a semi-structured interview protocol for QC reviewers (up to 30 interviews), a survey instrument for QC directors and supervisors (up to 141 surveys), and a survey instrument for QC reviewers (up to 235 surveys). The semi-structured interviews are expected to last approximately one hour. The surveys, which will be administered via Web or telephone, are anticipated to take approximately 30 minutes. Additional information contributing to this research will be collected from FNS regional offices and staff (not subject to OMB approval, as they are Federal employees<sup>1</sup>) and SNAP participants sampled for QC with incomplete reviews (OMB approval previously granted,<sup>2</sup> as described in further detail in Attachment E).

## **A.2. PURPOSE AND USE OF THE INFORMATION**

**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.**

The purpose of this information collection is to identify the factors that consistently lead to incomplete cases among active SNAP QC case reviews and identify possible means to enhance completion rates. Using analysis of primary data collection with persons involved in conducting and monitoring the QC reviews and extant administrative data from States, the study will assess the processes by which SNAP QC reviews are conducted; compare the characteristics of complete and incomplete SNAP QC cases; and identify the challenges and best practices in completing SNAP QC reviews.

The new information collection for which this OMB approval is requested includes in-depth (semi-structured) interview protocols that will be used to conduct interviews with SNAP QC staff during site visits to 6 State agencies (Attachments A.3A and A.4A), and telephone and Web surveys of SNAP QC staff in the remaining 45 States not being visited (Attachments A.3B and A.4B), excluding the two States that participated in survey and interview pre-tests.<sup>3</sup>

<sup>1</sup> As referenced in the Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies of April 7, 2010: "Collections from 'agencies, instrumentalities, or employees of the United States' in their official capacities are generally not subject to the PRA (44 U.S.C. § 3502(3)(A))." Accessed 12/20/2012 at [http://www.whitehouse.gov/sites/default/files/omb/assets/inforg/PRAPrimer\\_04072010.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/inforg/PRAPrimer_04072010.pdf).

<sup>2</sup> These include the QC Review Schedule FNS-380-1 (0584-0299, expiration 2/2016) and Worksheet for QC Reviews FNS 380 (0584-0074, expiration 5/2016).

<sup>3</sup> There are 53 SNAP "States" including the District of Columbia, Guam, and the U.S. Virgin Islands.

Related study data collection also includes interviews with Federal regional office staff who, as Federal employees, are not subject to OMB approval and burden estimates for data collection.<sup>4</sup> Specifically, these Federal interviews include in-depth interviews with staff at two FNS regional offices during the course of site visits, and surveys with staff at the remaining five regional offices.

A final related study data collection includes attempting to complete QC reviews (called re-reviews for this study, as they are subsequent attempts) of previously sampled SNAP cases that States failed to complete. Since the instruments used for these are the same as those prepared by USDA for use by the States and previously approved by OMB—and for which burden has been previously determined—the re-reviews are not considered a new data collection.<sup>5</sup>

The specific research objectives are to:

1. Describe the process of conducting a QC review at the State level.
2. Describe the process of conducting a QC review at the Federal regional level.
3. Describe the characteristics of incomplete cases and compare to complete cases using available case file data.
4. Describe the challenges and best practices in the QC review process at the State and Federal level.
5. Determine whether QC cases are being reviewed and processed correctly.
6. Determine the impact of incomplete QC cases on overall payment error if the study succeeds in completing some incomplete cases.

The information collected through in-depth interviews, telephone and Web surveys, and site visits will address Objectives 1 and 2. Objective 3 will be addressed using extant administrative data provided by States<sup>6</sup>. Objective 4 will be addressed using information collected through in-depth interviews and

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<sup>4</sup> As referenced in the Memorandum for the Heads of Executive Departments and Agencies, and Independent Regulatory Agencies of April 7, 2010: “Collections from ‘agencies, instrumentalities, or employees of the United States’ in their official capacities are generally not subject to the PRA (44 U.S.C. § 3502(3)(A)).” Accessed 12/20/2012 at [http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRAPrimer\\_04072010.pdf](http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/PRAPrimer_04072010.pdf)

<sup>5</sup> Previous OMB clearances include #0584-0299 and #0584-0074. See Attachment E for further detail.

<sup>6</sup> Table A.12.1 includes State burden estimates for gathering and submitting the extant administrative data.

Web or telephone surveys. The information collected through the QC re-reviews will address Objectives 5 and 6. Data from the site visits, in-depth interviews, surveys, and QC re-reviews will be used for the purposes of this study only, and will not be shared with any other agencies or entities outside of USDA.

The QC re-reviews, which will be limited to a maximum of 25 of the most recent incomplete cases in each of 3 States, are intended to provide supporting information about the possible contribution of incomplete reviews to error rates. They are not based on a statistical sample and are not intended to provide results generalizable to the national QC error rate.

### **A.3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION**

**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.**

The surveys of most State SNAP QC directors, State QC supervisors, and State QC reviewers will be conducted via Web or telephone. Potential respondents will be emailed links to the survey Web site. Those who do not respond will receive follow up phone calls and offered the opportunity to complete the survey either on the Web or through computer-assisted telephone interviewing (CATI). The Web and CATI instrument have not been designed and are pending OMB approval. Both will be consistent with the attached paper versions including the OMB approval number when granted. These methods offer efficient means of reaching a large number of respondents when the sampling frame is sufficiently large and includes accurate contact information. FNS estimates that 64 percent of these participants will respond via Web.

### **A.4. EFFORTS TO IDENTIFY DUPLICATION AND USE OF SIMILAR INFORMATION**

**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 determined that no comprehensive efforts to conduct site visits of State SNAP QC offices or to interview State QC staff, either by telephone or in person, have been conducted before. FNS has not previously researched the processes that might be responsible for declining rates of complete QC reviews or conducted interviews with State staff.

#### **A.5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES**

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

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. There are no small businesses used in this data collection. All new data collection is with State employees.

#### **A.6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY**

**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 information collection proposed for this study consists of in-depth interviews up to 1 hour in length with various State QC staff in 6 States during site visits and 30-minute Web or telephone surveys with State staff in the remaining 45 States, excluding 2 States that participated in pre-tests of the surveys and interviews. If these data are not collected, USDA will not have critical information for assessing the causes of incomplete QC reviews and improving the integrity of the QC process.

#### **A.7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINE OF 5 CFR 1320.5**

**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 3 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
- 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.

## **A.8. COMMENTS IN RESPONSE TO THE FEDERAL REGISTER NOTICE AND EFFORTS TO CONSULT OUTSIDE AGENCY**

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.

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.

### **A. Federal Register Notice and Comments**

A 60-day public comment notice required by 5.CFR 1320.8(d) was published in the Federal Register on July 26, 2013 in Volume 78, Number 144, pages 45173 – 45176. A correction notice was published in the Federal Register on August 7, 2013 in Volume 78, Number 152, pages 48135-48136.



One public comment was received during the 60-day period. However no response was provided because the comment is not relevant to the information collection.

**b. Consultations Outside of the Agency**

The data collection instruments were pre-tested externally with State QC staff to determine whether questions were written appropriately and captured data most relevant to the research questions and objectives. As survey participants, these individuals provided input to the research team about the survey questions, such as which questions were unclear or difficult to answer. In addition, as QC professionals, these pre-testers were experts in the subject matter and provided input on the content of the questions, including which questions were inappropriate and what questions should be included. This feedback was then used to refine and finalize the data collection instruments included in this package for OMB clearance. The QC staff who advised us on the survey content included the North Carolina QC Director, Pat Moore (phone: (919) 527-6282), and the District of Columbia QC Director, Mattie Pounds (phone: (202) 673-4572).

We also consulted with outside experts at the Statistics Division, NASS/USDA (phone: 202-609-0901) who reviewed sampling and statistical methodologies for the National Agriculture Statistics Service. The review from NASS and our response to their comments are provided in Attachment C.

**A.9. EXPLANATION OF ANY PAYMENT OR GIFT TO RESPONDENTS**

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

No payment or gift will be offered to interview or survey respondents.

## **A.10.ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

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

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 confidential 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. Interviewees will also be assured that no individually identifiable information will be included with any response; every effort will be made during reporting to minimize the extent to which the identities of respondents can be inferred from the data by not specifying States or locations. Furthermore, the link between any response and any individual will be secured by Insight in a locked (hard copy) or encrypted (computer) file and destroyed at the conclusion of the study pursuant to applicable USDA regulations.

All interviewers at Insight Policy Research (who will conduct site visits and in-depth interviews and who will analyze the survey responses) and ICF International data collection staff (who will conduct the Web and telephone surveys) are required to sign a data confidentiality pledge (see Attachment B) associated specifically with this study. In this agreement, the staff pledges to maintain the privacy of all information collected from the respondents and to not disclose it to anyone other than authorized representatives of the study, except as otherwise required by law.

## **A.11.JUSTIFICATION FOR SENSITIVE QUESTIONS**

**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 in the interview protocols and survey instruments are unlikely to be considered sensitive by respondents. 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. Some respondents may be uncomfortable about answering some of the questions regarding their perceptions of their own job requirements and performance and that of their management or staff. As part of the consent process, respondents will be informed that they may choose not to answer any specific questions and, as noted in A.10 above, that responses will be treated as private.

## **A.12.ESTIMATES OF HOUR BURDEN INCLUDING ANNUALIZED HOURLY COSTS**

**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.**

The burden estimates for respondents are shown in Table A.12.1. The information collection plan includes in-depth interviews in six States with State QC directors (one per State), State QC supervisors (two per State), and State QC reviewers (up to five per State). While in-depth interviews are expected to take 1 hour to complete, as determined through pre-tests of the instruments, additional time is included for the QC directors and QC supervisors to cover preparation for the visit and coordinating the participation of their staff. The estimates also include shorter surveys in the remaining 45 SNAP States

not covered by the site visits (6 States) and pre-tests (2 States).<sup>7</sup> In addition, burden estimates are provided for the State QC directors (one per State, 6 States) to discuss the administrative data request and for State IT staff (one per State, 6 States) to extract the data.

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<sup>7</sup> There are 53 SNAP “States” including the District of Columbia, Guam, and the U.S. Virgin Islands.

**Table A.12.1  
Total Burden Hours on the Public**

		Respondents						Nonrespondents						
Respondent Type	Instrument	Sample Size	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Non-Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Total Burden Hours	
<b>State QC Directors</b>														
State QC Director	Advance letter/Study information sheet	53	53	1	53	0.05	2.65	0	1	0	0	0.00	2.65	
State QC Director	Site visit recruitment email/Follow-up communications	6	6	1	6	1	6.00	0	1	0	0	0.00	6.00	
State QC Director	Phone call to discuss administrative data request	6	6	1	6	1	6.00	0	1	0	0	0.00	6.00	
State QC Director	Interview pretest	1	1	1	1	1	1.00	0	1	0	0	0.00	1.00	
State QC Director	In-person interview	6	6	1	6	1	6.00	0	1	0	0	0.00	6.00	
State QC Director	Survey pretest	1	1	1	1	1	1.00	0	1	0	0	0.00	1.00	
State QC Director	Web and telephone survey	45	18	1	18	0.5	9.00	27	1	27	0.05	1.35	10.35	
State QC Director	Survey: First phone call	27	10	1	10	0.5	5.00	17	1	17	0.08	1.36	6.36	
State QC Director	Follow-up phone call #1	17	3	1	3	0.5	1.50	14	1	14	0.08	1.12	2.62	
State QC Director	Follow-up phone call #2	14	2	1	2	0.5	1.00	12	1	12	0.08	0.96	1.96	
State QC Director	Follow-up phone call #3	12	2	1	2	0.5	1.00	10	1	10	0.08	0.80	1.80	
State QC Directors Subtotal		53	108	1	108	0.37	40.15	80	1	80	0.07	5.59	45.74	
<b>State QC Supervisors</b>														
State QC Supervisor	In-person interview	12	12	1	12	1	12.00	0	1	0	0	0.00	12.00	
State QC Supervisor	Web and telephone survey	94	37	1	37	0.5	18.50	57	1	57	0.05	2.85	21.35	
State QC Supervisor	Survey: First phone call	57	22	1	22	0.5	11.00	35	1	35	0.08	2.80	13.80	
State QC Supervisor	Follow-up phone call #1	35	7	1	7	0.5	3.50	28	1	28	0.08	2.24	5.74	
State QC	Follow-up phone call	28	5	1	5	0.5	2.50	23	1	23	0.08	1.84	4.34	

		Respondents						Nonrespondents					
Respondent Type	Instrument	Sample Size	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Non-Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Total Burden Hours
Supervisor	#2												
State QC Supervisor	Follow-up phone call #3	23	4	1	4	0.5	2.00	19	1	19	0.08	1.52	3.52
State QC Supervisors Subtotal		106	87	1	87	0.57	49.50	162	1	162	0.07	11.25	60.75
State QC Reviewers													
State QC Reviewer	Interview pretest	1	1	1	1	1	1.00	0	1	0	0	0.00	1.00
State QC Reviewer	In-person interview	30	30	1	30	1	30.00	0	1	0	0	0.00	30.00
State QC Reviewer	Survey pretest	5	5	1	5	0.5	2.50	0	1	0	0	0.00	2.50
State QC Reviewer	Web and telephone survey	229	91	1	91	0.5	45.50	138	1	138	0.05	6.90	52.40
State QC Reviewer	First phone call	138	55	1	55	0.5	27.50	83	1	83	0.08	6.64	34.14
State QC Reviewer	Follow-up phone call #1	83	16	1	16	0.5	8.00	67	1	67	0.08	5.36	13.36
State QC Reviewer	Follow-up phone call #2	67	13	1	13	0.5	6.50	54	1	54	0.08	4.32	10.82
State QC Reviewer	Follow-up phone call #3	54	10	1	10	0.5	5.00	44	1	44	0.08	3.52	8.52
State QC Reviewers Subtotal		265	221	1	221	0.57	126.00	386	1	386	0.07	26.74	152.74
State IT Staff													
State IT Staff	Extract administrative Data	6	6	1	6	8	48.00	0	1	0	0	0.00	48.00
TOTAL		430	422	1	422	0.62	263.65	628	1	628	0.07	43.58	307.23

Table A.12.2 below illustrates the estimated annualized cost to the public (including those considered responsive and nonresponsive) for the hours of burden for this data collection. For State QC directors, with a median hourly wage rate of \$36.83, the total cost burden would be \$1,684.60 for completed preparation, in-depth interviews, and surveys. For State QC supervisors, with a median hourly wage of \$30.86, the total cost burden would be \$1,874.75. For SNAP QC reviewers, with a median hourly wage of \$27.63, the total cost burden would be \$4,220.21. For State IT staff, with a median hourly wage of \$34.92, the total cost burden would be \$1,676.16. The table below depicts the maximum possible cost burden to the public.

**Table A.12.2**  
**Annualized Cost to Public**

Type of Respondents	Number of Respondents	Total Burden Hours	Hourly Wage Rate	Respondent Cost
State QC directors	53	45.74	\$36.83 <sup>8</sup>	\$1,684.60
State QC supervisors	106	60.75	\$30.86 <sup>9</sup>	\$1,874.75
State QC reviewers	265	152.74	\$27.63 <sup>10</sup>	\$4,220.21
State IT staff	6	48.00	\$34.92 <sup>11</sup>	\$1,676.16
<b>Total</b>	<b>424</b>	<b>307.23</b>		<b>\$7,779.56</b>

### **A.13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORD KEEPERS**

**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.**

No capital/startup or ongoing operational/maintenance costs are associated with this information collection.

<sup>8</sup> Based on the median hourly wage for Administrative Services Managers (11-3011), State Government, retrieved from [http://www.bls.gov/oes/current/naics4\\_999200.htm#11-0000](http://www.bls.gov/oes/current/naics4_999200.htm#11-0000).

<sup>9</sup> Based on the median hourly wage for Social and Community Service Managers (11-9151), State Government, retrieved from [http://www.bls.gov/oes/current/naics4\\_999200.htm#11-0000](http://www.bls.gov/oes/current/naics4_999200.htm#11-0000).

<sup>10</sup> Based on the median hourly wage for Financial Specialists, All Others (13-2099), State Government, retrieved from [http://www.bls.gov/oes/current/naics4\\_999200.htm#11-0000](http://www.bls.gov/oes/current/naics4_999200.htm#11-0000).

<sup>11</sup> Based on the median hourly wage for Computer Programmers (15-1131), retrieved from <http://www.bls.gov/oes/current/oes151131.htm>.

## **A.14. ANNUALIZED COST TO FEDERAL GOVERNMENT**

**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 36-month contract cost to the Federal Government is fixed price at \$1,808,609. This total includes costs associated with the study design, instrument development, technical development of survey forms, information collection, analysis, reporting, and presentation/publication of the results. Of that total, approximately \$701,800 will be used for data collection, including pre-tests, administrative data collection, in-person interviews, Web and telephone surveys, and QC re-reviews, for an annual estimate of \$233,933. The period of performance for the project is September 19, 2012 through October 15, 2015. This information collection also assumes a total of 800 hours of Federal employee time for a GS-14, Step 10 Senior Analyst at \$65.53 per hour, for a total of \$52,424 on an annual basis. Federal employee rates are based on the General Schedule of the Offices of Personnel Management (OMB) for 2012. The average annualized cost (contract + FNS costs) is \$286,357, and the total project cost of the data collection is \$859,072.

## **A.15. EXPLANATION FOR PROGRAM CHANGES OR ADJUSTMENTS**

**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 collection of information effort that will add 307.23 burden hours to the OMB inventory.

## **A.16. PLANS FOR TABULATION AND PUBLICATION AND PROJECT TIME SCHEDULE**

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

Survey data will be tabulated in SAS with results presented in tabular form appropriate to the data type with selected State or case characteristics. Data from in-depth interviews and site visits will be recorded, transcribed, and analyzed using NVivo 10 software.



For in-depth interview analysis, the researchers will import a verbatim transcript of each interview into NVivo and will code the data using a standard coding scheme for each interview type. Although the coding schemes for different interview types (e.g., State SNAP QC director, supervisor, or reviewer interview) may share many of the same themes, each will be coded separately to match the specific purposes of each interview. Coded interviews will identify characteristics of the State and the data source for purposes of analysis.

The schedule for data collection, analysis, and reporting is shown in Table A.16.1 below.

**Table A.16.1  
Project Time Schedule**

<b>Activity</b>	<b>Expected Activity Period</b>
Develop and test data collection instruments	January–May 2013
Conduct State site visits	May–July 2014
Conduct surveys	June–August 2014
Data analysis (site visit data)	September–December 2014
Data analysis (survey data)	September–December 2014
Submit final report to USDA	July 2015
Expected Web posting on FNS site	August 2015

**A.17. REASON(S) DISPLAY OF OMB EXPIRATION DATE IS INAPPROPRIATE**

**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 agency plans to display the expiration date of OMB approval on all forms/questionnaires associated with this information collection.

**A.18. EXCEPTIONS TO CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS**

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

There are no exceptions to the certification statement.