

REPORT

Part A:

Justification for the Collection of Data for the Supplementation Nutrition Assistance Program (SNAP) Employment & Training Study

October 27, 2014

Submitted to:
Office of Management and Budget

Submitted by:
Food and Nutrition Service
United States Department of Agriculture
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PART A: JUSTIFICATION

A.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.

1. The SNAP E&T program

This is a new information collection request. In 2013, SNAP—funded through the USDA and administered by states—provided food assistance to 47 million Americans (USDA FNS 2014). In addition to the program’s primary goal of alleviating hunger, SNAP also aims to help recipients move from dependence upon the program to economic self-sufficiency through the SNAP E&T program. The Food and Nutrition Act of 2008 authorizes USDA to “implement an employment and training program designed by the State agency and approved by the Secretary for the purpose of assisting members of households participating in the supplemental nutrition assistance program in gaining skills, training, work, or experience that will increase their ability to obtain regular employment (H.R. 2642, PL 113-128, Sec. 6(d)(4), p. 34).”¹

Unless SNAP clients meet federal exemption criteria,² they are required to register for work (and are commonly referred to as “work registrants”). However, not all work registrants will eventually participate in a SNAP E&T program. States can elect to exempt additional SNAP recipients from their SNAP E&T programs. For example, a state might exempt SNAP recipients

¹ <http://legcounsel.house.gov/Comps/Food%20And%20Nutrition%20Act%20Of%202008.pdf>

² The federal exemptions are as follows: (1) individuals who are younger than 16 or older than 59, (2) people with disabilities, (3) individuals working 30 hours a week or in another work program, (4) individuals receiving unemployment, (5) individuals caring for an incapacitated adult or a child under age 6, (6) individuals in a drug or alcohol treatment program, and (7) students enrolled at least half-time in school.

who do not live near a SNAP E&T program site or those for whom participation in the program would create hardships. Federal- and state-exempted recipients can voluntarily participate in the SNAP E&T program, but they are not subject to sanctions for noncompliance with the participation requirements that apply to mandatory participants. In 2013, there were 1.3 million SNAP work registrants and 629,000 SNAP E&T participants.

States have considerable flexibility regarding how they design and implement their SNAP E&T programs. Although some states administer their SNAP E&T programs directly, many implement the programs through local service providers. There are no federal participation minimums or performance standards, and FNS mandates only that states include at least one of the following activities among their program offerings: (1) job search assistance; (2) job search training; (3) workfare (subsidized work experiences at public agencies); (4) work experience or training; (5) referrals to state, local, or Work Investment Act (WIA) work programs (if not offered by the SNAP E&T program provider); (6) education programs; and, (7) self-employment services. States also determine the minimum participation requirements placed on program participants, not to exceed 120 hours per month. Federal regulations require that able-bodied adults with no dependents participate in activities for at least 20 hours per week.³

2. Overview of the SNAP E&T study

The purpose of the study is to collect data to understand (1) how the SNAP E&T program serves participants, (2) what supports participants require to develop their skills, and (3) whether existing programs provide these necessary supports and meet participants' needs. This package requests clearance for three key data collection activities conducted as part of the study: (1) a survey of SNAP work registrants and SNAP E&T participants, (2) a survey of SNAP E&T

³ States may request a waiver of the time limit for people living in areas either with an unemployment rate greater than 10 percent or with insufficient jobs. States also have the authority to exempt individuals using the 15-percent exemption authorized by the Balanced Budget Act of 1997.

providers, and (3) collection of focus group data from SNAP E&T participants. These data will help us to understand how SNAP E&T programs serve participants, what supports participants need to develop their skills, and whether existing programs provide these necessary supports and meet participants' needs. To address these research needs and fulfill the SNAP E&T study objectives, FNS requests Office of Management and Budget (OMB) approval to use the data collection instruments, which are attached to this submission and discussed throughout the remainder of this package. Additional materials that help ensure efficient and effective data collection are also attached to this submission and listed below. The study team also will collect administrative data from states that will be used to generate the sampling frames for the surveys and focus groups, and which will augment the analyses of client characteristics (see the list of data elements collected in A.17).

A.2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

FNS will use findings from the SNAP E&T study to assess the characteristics of work registrants, SNAP E&T participants, and SNAP E&T program providers to understand current program implementation and inform program enhancements and future SNAP policy. FNS has three key objectives for the SNAP E&T study:

1. Develop a detailed description of the characteristics of SNAP work registrants and SNAP E&T participants.
2. Describe the needs and challenges registrants and SNAP E&T participants face in the changing economy. It is important to understand what types of skills workers currently have (or had before participating in a program), what skills are needed in the local labor market,

and whether SNAP E&T programs and providers recognize the gaps and craft services to address them.

3. Describe the characteristics of the SNAP E&T program service providers and the types of services available to participants.

To achieve these objectives, (using the list of data collection instruments in Table A.1) the study team will survey work registrants, SNAP E&T participants, and program providers from 25 states, as well as conduct focus groups with SNAP E&T participants from 5 states. The study team has randomly selected a nationally representative sample of 25 states using data received from FNS. The study team will collect administrative and provider data from each state (A.17) to create nationally representative samples of work registrants and SNAP E&T participants, as well as a sample of SNAP E&T program providers (see Part B of this submission for a detailed explanation of the study’s sampling methodology). The study team will augment the analysis of survey and focus group data with secondary sources—such as the Bureau of Labor Statistics’ (BLS) Quarterly Census of Employment and Wages (QCEW) and the Census Bureau’s American Community Survey (ACS)—and the administrative data obtained from states to conduct study sampling. A summary of the key research objectives and questions by the data source that the study will use to analyze them are included in Attachment 15.

Table A.1. SNAP E&T study data collection instruments for OMB approval

Instrument or attachment	Description
Instruments	
I.1	SNAP E&T registrant and participant survey
I.1.S	SNAP E&T registrant and participant survey in Spanish
I.1.1	SNAP E&T registrant and participant survey web image
I.2	SNAP E&T provider survey
I.2.1	SNAP E&T provider survey web image
I.3	SNAP E&T focus group participant information form
I.4	Focus group discussion guide
Attachments	

SNAP E&T registrant and participant survey materials

A.1	Survey advance letter
A.2	Survey reminder postcard
A.3	Survey reminder letter 1
A.4	Survey pre-incentive letter
A.5	Survey reminder letter 2
A.6	Survey flyer
A.7	Survey thank you letter (containing incentive) ⁴
Provider survey materials	
A.8	Survey advance letter, email
A.9	Survey reminder email
A.10	Survey reminder postcard
Participant focus group materials	
A.11	Focus group screening questionnaire and recruitment script
A.12	Focus group confirmation letter
A.13	Focus group confirmation call script
A.14	Focus group participant consent form
Additional materials	
A.15	Research objectives and questions by data source
A.16	Pre-test memorandum
A.17	List of administrative data elements
A.18	Responses to comments from US Department of Agriculture National Agricultural Statistics Service

1. SNAP E&T registrant and participant survey

Data collected as part of the SNAP E&T registrant and participant survey will be critical to helping FNS understand the demographic and labor force characteristics of work registrants and participants, and their barriers to employment. With these data, FNS will know whom the program is serving and be able to identify where gaps in services or skills may exist, to ultimately improve the program. In addition to demographic information, the SNAP E&T registrant and participant survey (Instrument I.1 and Instrument I.1.S-Spanish) will collect data in the following areas:

⁴ Burden estimates for materials which support survey and other instruments are bundled. Thus, A1-A7, A8-A10, and A11-A13 are bundled. The burden for A14 is accounted for in the burden to participate in the focus group.

- Labor force characteristics (for example, most recent job; reasons for current or past unemployment; duration of employment; typical employer type, industry, and occupation; and, earnings)
- Barriers to employment (for example, challenges faced while looking for work)
- Skills (for example, educational attainment, professional certifications, enrollment in education and training programs)
- Employment goals and expectations (for example, job search activities, and the targeted industry and occupation)
- Experience in the SNAP or SNAP E&T programs (for example, duration of program enrollment and frequency of attendance; program location and type of provider; challenges attending the program; program activities; reasons for nonattendance, if applicable; post-program employment outcomes; overall satisfaction with the program; suggestions for improvement).

Respondents will be able to complete the survey via computer-assisted telephone interviewing (CATI) instruments or on the web, in either English or Spanish. We estimate that 3,000 respondents--1,500 work registrants and 1,500 SNAP E&T participants-- will complete the approximately 20-minute survey.

2. SNAP E&T provider survey

A survey of SNAP E&T program providers primarily will be used to describe the characteristics and environment of the program providers, but the survey will also inform FNS' understanding of E&T participants' skills and possible gaps in those skills. Because of the flexibility afforded to states in implementing SNAP E&T programs, a diverse set of providers has emerged that includes directors or staff at state SNAP or DOL agencies and community-

based and private organizations that provide education and training. The information collected through the survey will give FNS a clearer sense of provider strategies, coverage areas, intensity of participation, funding sources, and coordination with other agencies. Key topics from the SNAP E&T provider survey (Instrument I.2) include the following:

- The services offered (for example, job search assistance, training, workfare, work experience, education, English as a second language, test preparation), training durations, training requirements, certification programs, and post-training follow-up service.
- The geographic region covered, type of organization, target populations, size of population served, and funding sources
- The formal coordination efforts with education, state, or federal service programs, including WIA, and any coordination efforts through community organizations
- The perceptions of participants' skill levels and motivations and of areas of high labor demand in the local labor market

The SNAP E&T provider survey (who will be known as 'Providers' throughout this collection) will be primarily a web-based survey that will take about 30 minutes to complete (Attachment I.2). Providers will also be able to complete the survey by telephone or by printing a paper instrument and faxing or mailing it to us (we will then enter the data into the web instrument). Out of 658 providers contacted, a total of 500 providers are estimated to complete the survey.

3. SNAP E&T participant focus groups

SNAP E&T participant focus groups will help FNS better understand participants' current skill sets, training needs, and barriers, providing context and details that cannot be obtained during a 20-minute survey. The study team will direct discussions toward understanding what

skills participants do and do not have, and how gaps in skills or other barriers prevent them from obtaining employment. Trained moderators will also ask about the types of jobs that participants have applied for and the results of those efforts. The discussion also may provide insight into the kinds of skills participants wish they could develop and what opportunities they have to develop them through providers. In addition, discussions will focus on the types of programs participants have completed and the positive and negative aspects of these programs. Key topics from the focus group discussion guide (Instrument I.4) that will help direct the focus groups include the following:

- The skills gaps and training needs of SNAP E&T participants (for example, relationship of skills to labor market demands, goals and motivations of participants, and need for a skills development)
- The training received by those who participated in the SNAP E&T programs (for example, type, length, location, and relevance to labor market needs)
- The challenges and obstacles for SNAP E&T participants in obtaining and retaining employment (for example, health issues, language barriers, literacy, housing, substance abuse, and accessibility to services)

So that the discussion can turn immediately to these and other key topics, the study team will ask participants to complete a brief SNAP E&T focus group participant information form (Instrument I.3) that asks basic demographic and work history questions. As with the surveys, the discussion guide for the focus groups will be developed in English and in Spanish. To the extent possible, the study team will use early findings from the SNAP E&T registrant and participant survey to focus the discussions on topics that call for further elaboration or that require additional context for interpretation. Although the study team will not alter instrument

questions, survey data may be used to determine which questions focus group moderators should highlight for further probing. In total, the study team plans to conduct 15 focus groups across five states, targeting 120 to 150 participants. Each focus group will last for about 90 minutes.

A.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.

FNS is committed to complying with the E-Government Act of 2002 to promote the use of technology. The information to be collected for the SNAP E&T study will come from (1) surveys of work registrants and SNAP E&T participants, (2) surveys of SNAP E&T providers, and (3) focus groups with SNAP E&T participants. The study team also will collect administrative data from states, which will be used to construct the survey and focus group sampling frames and to augment the analyses of client characteristics (Attachment A.17). Each survey instrument has been designed to collect only those data necessary for answering research questions while minimizing the burden on respondents. Wherever possible, improved technology has been incorporated into the data collection to reduce respondent burden. For example, the study team will include prefilled data in the work registrant and participant survey for respondents to verify, reducing the number of questions to be asked in the survey. In order to do this, the study team will use program administrative data provided by states (using Attachment A.17) to obtain respondents' SNAP E&T work registration and participant status, benefit level and duration on SNAP, amount and sources of income, household size and composition, and demographic characteristics (age, gender, race, citizenship status, and marital status).

1. SNAP E&T registrant and participant survey

The study team will provide registrants and participants with two options for responding—(1) CATI instruments and (2) the web—both of which will require about the same amount of time (20 minutes) to complete. FNS anticipates that 10 percent of SNAP E&T registrants and participants will complete their response electronically. Both modes provide benefits for data collection. CATI benefits both the data collectors and the respondents, as it allows greater flexibility in scheduling for survey respondents, which makes the survey less burdensome to them. Also, CATI programming ensures skip logic, restricts entries to valid responses, and checks for logical consistency across questions. Trained interviewers are able to correct errors during the interview, eliminating the need for callbacks to respondents—further reducing the burden on respondents as well as keeping costs in check and maximizing data quality. A web-based survey benefits respondents, who can take it at any time of the day and at their own pace, as well as the study team, as it reduces the need for data collectors. Because low-income households, such as those containing SNAP recipients, are increasingly connected to the Internet, a web-based survey may be utilized by this population. In 2011, over 60 percent of adults in households with incomes less than \$30,000 used the Internet (up from 28 percent in 2000). SNAP E&T program participants are also likely to have familiarity with and access to computers through the SNAP E&T work programs in which they are participating (some SNAP E&T programs are conducted exclusively on computers). The web-based survey will be programmed with internal data checks so that responses are logical and within reasonable ranges. At this time, the web-based version of the survey has not been prepared, but we will provide a complete set of screenshots of the web instrument on OMB approval. For a mock-up of the first page of the web-

based version of the survey which includes the public burden statement, OMB Control Number and Expiration Date, see Instrument I.1.1.

To further reduce respondent burden for both modes of survey administration, when possible the study team will include prefilled administrative data that require verification, such as information on demographic characteristics and income. Doing so will reduce cognitive difficulty and encourage accurate responses.

2. SNAP E&T provider survey

The primary completion mode for the provider survey will be the web. However, in order to provide maximum flexibility to respondents, the study team also will provide respondents with the option to complete the survey over the phone (Instrument I.2). FNS anticipates 90 percent of the providers will complete their survey electronically. At this time, the web-based version of the survey has not been prepared, but we will provide a complete set of screenshots of the web instrument on OMB approval. For a mock-up of the first page of the web-based version of the survey which includes the public burden statement, OMB Control Number and Expiration Date, see Instrument I.2.1.

3. SNAP E&T participant focus groups

The nature of the focus group does not provide for the use of information technology to reduce the burden (Instrument I.4).

A.4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

There is no similar prior or ongoing data collection being conducted that duplicates the efforts of the proposed data collection for the SNAP E&T study. It has been 20 years since FNS

sought information about the characteristics of work registrants, SNAP E&T program participants, and the providers that serve them. Furthermore, it has been about 10 years since other organizations, including ERS and GAO, examined the program or its participants.

Every effort has been made to avoid duplication of data collection efforts. No respondent will be asked for the same information more than once. Before contacting respondents, the study team will use program administrative data (Attachment A.17) to obtain respondents' work registration and SNAP E&T participant status, benefit level and duration on SNAP, amount and sources of income, household size and composition, and demographic characteristics (age, gender, race, citizenship status, and marital status). The study team will provide this information as prefilled data on the work registrant and participant survey for respondents to verify.

A.5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

We expect many of the SNAP E&T providers will be small, community-based organizations in many states. As such, any comprehensive study of the SNAP E&T program must include these organizations. The exact proportion of SNAP E&T providers that are small entities is not known and will be estimated for the first time as part of this study. However, experience studying similar employment and training programs around the country indicates that approximately 50 percent of the provider sample will be comprised of these small entities. We will minimize burden on these providers by ensuring that the survey can be completed in 30 minutes or less. Furthermore, we will not ask them provide program records or any other ancillary data, and we will not ask them to participate in any other activities that might otherwise be burdensome or time-consuming. Finally, while the primary data collection mode for the survey will be the web, providers will be allowed to complete the survey over the phone should

that mode be more convenient. FNS anticipates that 50 percent of small entities (250 out of 500) will be involved with this data collection.

A.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.

The proposed data collection activity involves one-time data collection for each respondent for the SNAP E&T study. Without this information, FNS will not be able to assess whether SNAP and the SNAP E&T program are providing work registrants and program participants with the supports they need to achieve one of SNAP's main goals—moving from dependence upon the program to self-sufficiency. Without data from SNAP E&T program providers, FNS will lack information about the difficulties and successes of program implementation that could inform key program enhancements. Further, although survey data from work registrants and SNAP E&T program participants will provide important information about what is going on around the country, data collected during the focus groups will help provide an in-depth picture of the challenges facing SNAP E&T program participants in today's economy. Finally, we cannot generate the sampling frames for the surveys or focus groups without the administrative data requested from states.

A.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 for the proposed data collection efforts.

A.8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden. 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 format (if any), and on the data elements to be recorded, disclosed, or reported.

1. Federal Register notice and comments

A *Federal Register* notice announcing plans to submit this data collection package to OMB was published on Tuesday, July 15, 2014 (*Federal Register*, Vol. 79, No. 135, pp. 41249–41251), consistent with the requirements of 5 CFR 1320.8 (d). FNS received no public comments.

Consultations outside of the agency

FNS regularly consults with State Agencies who manage E&T programs and the Agency has provided an opportunity to comment on the notice which is sent out to State Agencies. In addition to soliciting comments from the public, FNS consulted with the following individuals for expert consultation about the availability of data, the design, level of burden, and clarify of instructions for this collection:

Leslie Smith

Methodology Division

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USDA-NASS

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Jackie Windfeldt

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United States Department of Agriculture – Food and Nutrition Service - Supplemental
Nutrition Assistance Program

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703-305-2062

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

Providing incentives to respondents can improve response rates and, by reducing respondent locating efforts, can lower overall survey costs without affecting data quality (Singer and Kulka 2002; Willimack 1995). To that end, we are requesting permission to offer a financial token of appreciation to promote cooperation and full participation in the work registrant and SNAP E&T program participant survey and focus groups conducted for the SNAP E&T study.

The study team will offer work registrants and participants a differential incentive to encourage them to complete the survey via either the web or by calling the study team (versus the incentive offered to those sample members for whom the study team initiates a call). The study team will give \$40 if the respondent completes the interview in one of these less-expensive modes, and \$20 if the study team initiates the call. These tokens of appreciation will be cited in the advance letters sent to respondents (Attachment 1). If it becomes necessary to increase the

work registrant and program participant survey response rate to meet analytical study goals and answer research questions privately, the study team will identify nonrespondents during week 7 of the survey and mail each a letter (Attachment 4) with \$5 as an incentive to visit the website or call us to complete the survey.

For the 90 minute focus groups, participants will receive \$40 as a token of our appreciation. To encourage timeliness, participants who arrive 15 minutes early will receive an additional \$10 to further show our appreciation. As noted above, these incentive amounts can offset the high costs associated with recruiting hard to reach populations, and will help offset any costs associated with participation (such as transportation or childcare).

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

1. Privacy

In accordance with the Privacy Act of 1974, we will protect the privacy of all information collected for the evaluation and will use it for research purposes only, except otherwise required by law. No information that identifies any study participant will be released. Furthermore, personally identifiable data will not be entered into the analysis file, and data records will contain a numeric identifier only. A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on March 31, 2000, Volume 65, Number 63, and is located on pages 17251-17252 discusses the terms of protections that will be provided to respondents.

When reporting the results, data will be presented only in aggregate form, so that individuals and institutions will not be identified. A statement to this effect will be included with all requests for data (see Instruments I.1 through I.4). Furthermore, the study team will not maintain any personally identifiable information (PII). All members of the study team having access to the

data will be trained on the importance of privacy and data security. All data will be kept in secured locations. Identifiers will be destroyed as soon as they are no longer required.

The following safeguards will be employed by the study team to protect privacy during the study:

- Access to identifying information on sample members will be limited to those who have direct responsibility for providing and maintaining sample locating information. At the conclusion of the research, these data will be destroyed.
- Identifying information will be maintained on separate forms and files that are linked only by sample identification numbers.
- Access to the file linking sample identification numbers with respondents' IDs and contact information will be limited to a small number of individuals who have a need to know this information.
- Access to hard copy documents will be rigorously limited to project staff with a need to know. Documents will be stored in locked files and cabinets. Documents containing PII will be shredded when discarded.
- Computer data files will be protected with passwords and access will be limited to specific users on the research team.
- Employees must notify their supervisor, the project director, and the Mathematica security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner.

The study team will ensure that all data files are safeguarded for privacy, and that responses are made available only in tabular form. Under no circumstances will information be made available to SNAP program personnel. SNAP program staff responsible for assisting

Mathematica in the recruitment of study participants will be fully informed of Mathematica's policies and procedures to safeguard data.

2. Data security

As frequent users of data obtained from and on behalf of federal (and state) agencies, the study team has adopted federal standards for the use, protection, processing, and storage of data. These safeguards are consistent with the Privacy Act, the Federal Information Security Management Act, OMB Circular A-130, and security standards from the National Institute of Standards and Technology. Data are encrypted in transit and at rest using cryptographic modules compliant with the Federal Information Processing Standard 140-2. Mathematica will retain the data collected on the SNAP E&T study for the duration of the study. The study team will secure individually identifiable information and other sensitive project information, and will firmly control access to sensitive information to a need-to-know basis.

Data processed for the SNAP E&T study will be completely purged from all data storage components of the computer facility in accordance with instructions from FNS. Until purging of all data storage components, Mathematica will certify that any data remaining in any storage component will be safeguarded to prevent unauthorized disclosure.

3. Institutional Review Board

This project does not require IRB review largely because the study's research protocols pose minimal risks to study participants. Study participants are not at risk of any criminal or civil liability, nor are they likely to experience any damage to their financial standing, employability, or social reputation through participating in this study. Moreover, the data collected will only result in reports which display aggregate findings, thereby providing additional safeguards against the deductive disclosure of any study participants.

A.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.

The SNAP E&T study data collection instruments do not contain topics of a sensitive nature. However, some individuals may consider race, ethnicity, mental or physical health, or income to be sensitive information. The study needs to collect this information to ensure the sample includes a cross-section of the SNAP population, and FNS is interested in perceived barriers or discrimination respondents may have faced in obtaining or keeping employment, any of which could be cited. Nonetheless, respondents will be informed that this collection is voluntary and they do not have to respond to any questions that they do not feel comfortable answering. They also will be notified that there are no penalties for not responding (see the introductions of attached Instruments I.1, I.2, I.3, and I.4).

A.12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

The SNAP E&T study will be conducted for three years, but data will be collected only once and within a single consecutive 12-month period. Thus, “total” and “annualized” burden are the same for the SNAP E&T study. The affected public is 53 State Agencies; 500 Business for and not for profit (respondent type known as community-based organizations (CBOs); 3,000 Individuals and Households (respondent type known as 1,500 E&T work registrants and 1,500

participants). The number of respondents includes those who choose not to participate known as non-respondents. Table A.12 shows sample sizes and estimated burden hours for each data collection component, which are also discussed below. Although The SNAP E&T study will last for three years, data will be collected only once and within a single consecutive 12-month period. Thus, “total” and “annualized” burden are the same for the SNAP E&T study.

1. Estimate of annual burden

The total estimated maximum hours of burden for the data collection included in this request for clearance is about 2,239 hours, which equals the sum of the estimated burden for all data collection activities. This includes 10.9 burden hours for pretesting conducted. Data will be collected only once.

a. State agencies

Out of 53 state agencies, the study team will collect administrative data from 25 states. The study team’s sampling plan called for contacting no more than 30 states with 5 states as alternates. At this time, all states have been recruited and 4 out of 5 of the alternate states were contacted. The data will be used to generate the sampling frames for the surveys and focus groups, and also will be used to augment the analyses of client characteristics. We estimate that it will take state agencies a total of 12 hours to provide the requested files; 2/3 (or 8 hours) of which will be spent conferring with the study team, extracting data from their SNAP E&T database, ensuring data completeness, accuracy, and overall quality, converting the data into a usable format (e.g., Excel), and transmitting a test file, with the other 1/3 (or 4 hours) of the time spent preparing and transmitting the final administrative file. We also expect that five states will devote one hour per state to provide requested files for sampling focus group participants. The estimated total maximum reporting burden for administrative data collection from states has been

rounded up to 305 hours (25 states' surveys * 12 hours per state = 300 hours or 18,000 minutes) + (5 states' focus groups * 1 hour per state).

b. Work registrants and SNAP E&T participants and non-respondents

The study team expects to conduct 3,000 surveys of SNAP E&T work registrants and participants (1,500 of each respondent type). Each survey should take a total of 25 minutes (5 minutes to read the letter and 20 minutes to complete the survey). We estimate 95 percent of the sample will be eligible and anticipate a response rate of about 80 percent. To obtain the sample of 3,000, the study team will contact 3,948 individuals, with 948 nonrespondents. We anticipate that these 948 individuals will spend 5 minutes reading the letter and other supporting material. Thus, the estimated total maximum reporting burden for surveys of work registrants and SNAP E&T program participants is about 1,329 hours (3,000 surveys * 25 minutes per survey = 75,000 minutes or 1,250 hours; and, 948 nonrespondents * 5 minutes per letter = 4,740 minutes or 79 hours).

The study team expects to conduct focus groups with about 120 to 150 SNAP E&T program participants. Each focus group is expected to take 100 minutes (90 minutes for the discussion and 10 minutes for the screening call and reviewing materials). Based on previous experience with similar populations, the study team will need to contact about four times the number of participants they wish to recruit; thus, the study team will have to contact 600 SNAP E&T participants to obtain 120 to 150 focus group participants. We anticipate that 450 individuals (non-respondents) will be contacted and spend an estimated 5 minutes reviewing materials and participating in a screening call, but will not ultimately participate in a focus group. Screening calls to eligible participants who agree to take part in focus groups will be about twice as long as those to individuals (non-respondents) who are ineligible or who decline to participate in the

focus groups (10 minutes versus 5 minutes), because the former will include a discussion about potential dates, times, and location for the focus group. The estimated total maximum reporting burden for focus groups with SNAP E&T program participants and SNAP work registrants is about 288 hours (up to 150 participants * 100 minutes per focus group = 15,000 minutes or 250 hours; and, 450 non-respondents * 5 minutes per call = 2,250 minutes or about 38 hours).

The total estimated burden hours for data collection from work registrants and program

Table A.12. Burden estimates for data collection efforts and cost to respondents participants is about 1,627 hours (1,313 + 288 + 7.5 combined hours for pre-tests).

Affected Public	Respondents								Non-Respondents						
	Respondents Type	Instrument	SAMPLE SIZE	Number of respondents	Frequency of data collection	Total responses	Time per response (hours)a	Total Estimated annual burden (hours)b	Number of non-respondents	Frequency of data collection	Total responses	Time per response	Total burden estimate	Grand burden estimate	
State Agency	State SNAP Agencies														
	State agency respondents	Administrative Burden Retrieval using FNS 583	30	25	1	25	12	300	4	1	4	0.0835	0.3340	3	
		Administrative data using FNS 583 provided by the five selected states for focus group	5	5	1	5	1	5	0	0	0	0	0.0000		
State Agencies Subtotal			30	25	-	30	-	305	4	1	4	-	0.3340	3	
Individuals and Households	Work Registrants and SNAP E&T Participants														
	SNAP work registrant survey respondents (group 1)	SNAP E&T Registrant and Participant Survey and advance letters (A1-A7):	1,974.00	1,500	1	1,500	0.4175	626.25	474	1	474	0.0835	39.58		
	SNAP E&T participant survey respondents (group 2)	SNAP E&T Registrant and Participant Survey and advance letters (A1-A7):	1,974.00	1,500	1	1,500	0.4175	626.25	474	1	474	0.0835	39.58		
	SNAP E&T focus group participants	SNAP E&T Participant Focus Groups and recruitment materials (A11-A14):	600	150	1	150	1.668	250.2	450	1	450	0.0835	37.58		
	SNAP E&T Registrant and Participant	Survey Pretest	8	8	1	8	0.43	3.44	0	1	0	0	0.00		
	SNAP work registrant survey	Survey Pretest	5	5	1	5	0.38	1.9	0	1	0	0	0.00		
	SNAP E&T Registrant and Participant	Focus Group Pretest Telephone Interview	4	4	1	4	0.53	2.12	0	1	0	0	0.00		
Individual/ Households Subtotal			3,965.00	3,017.00	-	3,167.00	-	1,510.16	948.00	-	1,398.00	-	116.73	1,627.73	
Business for-not-for-profit	SNAP E&T Program Providers														
	SNAP E&T provider Community-based organizations	SNAP E&T provider survey and recruitment materials (A8-A10)	658	500	1	500	0.58	290.00	158	1	158	0.0835	13.19		
	SNAP E&T provider Community-based organizations	Survey Pretest: SNAP provider survey	4	4	1	4	0.86	3.44	0	0	0	0	0.00		
Business Subtotal			658.00	500.00	-	504.00	-	293.44	158.00	-	158.00	-	13.19	3	
Grand Total			4,653.00	3,542.00	-	3,701.00	-	2,108.60	1,110.00	-	1,560.00	-	130.26	2,227.73	

c. SNAP E&T program providers

The study team expects to conduct 500 surveys of SNAP E&T program providers and expect that each survey will take 35 minutes (5 minutes to read the letter and 30 minutes to complete the survey). We anticipate a response rate of about 80 percent. To obtain the sample of 500 the study team will contact 658 individuals, with 158 nonresponders. We anticipate that these 158 nonresponding individuals will spend 5 minutes reading the letters and postcard. The estimated total maximum reporting burden for surveys of SNAP E&T program providers has been rounded up to 305 hours (500 surveys * 35 minutes per survey = 17,500 minutes or about 290 hours; and, 158 nonrespondents * 5 minutes per letter = 790 minutes or about 13 hours).

2. Estimates of annual costs

The total monetized burden estimate for the SNAP E&T study is \$33,150.60, which equals the sum of the estimated monetized burden for all data collection activities (Table A.12b). This includes \$106.61 for the provider pretesting conducted previously.

a. State agencies

The total monetized burden estimate for data collection from state agencies is \$11,853.07. That is the total estimate hours of burden to collect administrative data for survey and focus group samples for this data collection multiplied by an hourly wage of \$38.82, which is the average hourly wage for a database administrator (the specific state agency staff from whom we expect to collect these data) (Bureau of Labor Statistics 2013).

b. SNAP work registrants and E&T program participants

The total monetized burden estimate for proposed data collection from SNAP E&T work registrants and program participants is \$11,794.97. This is the sum of (1) the estimated hours of burden for the work registrant survey respondents and nonrespondents multiplied by an hourly

wage of \$7.25, (2) the estimated burden for the SNAP E&T participant survey respondents and nonrespondents multiplied by an hourly wage of \$7.25, (3) the estimated hours of burden for the SNAP E&T focus groups (participants and nonparticipants) multiplied by an hourly wage of \$7.25, and the estimated hours of burden for pretesting these instruments multiplied by an hourly wage of \$7.25. This hourly wage represents the federal minimum wage (U.S. Department of Labor 2014).

c. SNAP E&T program providers

The total monetized burden estimate for data collection from SNAP E&T program providers is \$9,502.56, which is the sum of the estimated hours of burden for providers either to take the survey, not-respond to the survey, or pre-test the survey multiplied by an hourly wage of \$30.99. This hourly wage rate represents the mean hourly wage rate for social and community service managers (Bureau of Labor Statistics 2013).

A.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 questions 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.

These information collection activities do not place any capital costs or costs of maintaining requirements on the respondents.

A.14. Provide estimates of annualized cost to the Federal government. 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 is \$498,171.93. The largest cost to the Federal government to conduct the SNAP E&T study is to pay a contractor \$1,489,345.00 to conduct the study over a three year period. This is based on an estimate of 20,436 hours, with a salary range from \$294.49 to \$6.49 per hour. This contract cost includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up websites, and other miscellaneous items. The SNAP E&T study will take three years to complete, thus the annualized cost to the federal government to pay a contractor for the SNAP E&T study is \$496,448.33. The information collection also assumes that a total of 40 hours of Federal employee time per year: for a GS-13, step 1 at \$43.09 per hour for a total of \$1,723.60. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2014.

A.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 collection of information that will add 2,253 burden hours to the OMB inventory as a result of program changes.

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

1. Analysis plans

Using primarily descriptive analytic techniques, the study team will analyze data collected from surveys and focus groups, administrative records provided by states, and secondary data sets to address each study objective and answer the study research questions. Before generating

tabulations, the study team will weight the survey data as appropriate, based on the survey design and sampling methods, so that the tabulations of work registrants and E&T participants are nationally representative. The study team will primarily use the weighted findings from the surveys for analysis but, where needed, the study team will supplement with administrative data, secondary data sources, and focus group findings.

Several of the study's research questions, especially those under objective 2, are difficult to answer using only the survey data; therefore, the study team will draw on its expertise using BLS and Census Bureau data sets—such as QCEW and ACS—to construct additional variables for analysis. They will estimate characteristics, skill and training levels, challenges and obstacles to employment, and services available, across the entire sample. However, if sample sizes and statistical power permit, the study team will also conduct analysis within subgroups and compare results across subgroups. The study team will conduct statistical significance testing on all calculations presented to determine significance overall and by subgroup, at the 0.05 level. Each study objective requires slightly different analysis and varying sources of data, as discussed below.

Separate sets of weights will be constructed for each of the target groups being sampled: (1) work registrants, (2) SNAP E&T participants, and (3) SNAP E&T providers. Weights are needed to account for differential sampling, which includes probability proportional to size sampling, to account for nonresponses (which will likely occur during data collection) and any incomplete coverage that may exist in the sampling frames.

Construction of the analysis weights for each of the target groups will involve four main steps. First, probabilities of selection will be calculated for the responding units in the analysis samples. The inverses of the probabilities of selection will serve as the initial sampling weights.

Second, nonresponse weighting adjustments will be made to the sampling weights to correct for different response rates among different groups. Nonresponse weighting adjustment factors will be developed during an extensive nonresponse bias analysis in which variables associated with nonresponse propensities will be determined using chi-squared automatic interaction detector (CHAID) procedures (Kass 1980). Variables identified during the CHAID procedures will be used in logistic regression models to estimate response propensities. The propensity scores for respondents will then be used for the nonresponse adjustments to the sampling weights. Third, either post-stratification to known population totals or ratio adjustments to estimated totals will be made to the weights to correct for any incomplete coverage in the sampling frames. The fourth and final step will be to identify and adjust for any extreme outlier weights that may result from the first three steps of the weight construction. Weights that are extremely large relative to all other weights can increase design effects and give certain cases undue influence on estimates based on the analysis samples.

Objective 1: Describe the characteristics of SNAP work registrants and the training received by those who participate(d) in SNAP E&T programs. Using the administrative and survey data, the study team will estimate the characteristics of work registrants and SNAP E&T participants through side-by-side tabulations that will allow us to compare and contrast the two groups. Basic characteristics, such as age, gender, race, marital status, household size, benefit level and spell, and income at SNAP application and recertification, will come from the administrative data collected from states. The study team will supplement with survey data for additional factors on labor market experience, status, and history, as well as participation in SNAP E&T programs (for participants). Using these data, the study team will compare, for instance, the income levels and SNAP benefit levels of work registrants and SNAP E&T

participants to determine if there are differences between the two groups (although, without baseline information for these clients we will not be able to attribute differences to participation in the SNAP E&T program). The study team may also be able to compare characteristics of mandatory versus voluntary participants to determine if there are distinct differences between these populations in terms of skills or work history.⁵ In addition, the study team will perform cross tabulations to help delineate relationships between characteristics, such as the duration of SNAP participation on demographics, education level, benefit level, household size, and duration of participation in SNAP E&T programs. Finally, the study team will analyze labor force status across the same types of variables to get a better understanding of how the various factors relate.

Objective 2: Describe the needs and challenges for registrants and E&T participants.

Objective 2 is focused on identifying skill gaps and training needs, along with challenges and obstacles to employment. Although identifying challenges and obstacles to employment is relatively straightforward, collecting information on an individual's skills compared with the skills needed in the area (the skills gap) is not as easy. Specifically, the challenge in identifying the gap between the skills that workers have and the needs in their area is that it is difficult for work registrants and SNAP E&T program participants to assess the needs of employers in their community. Although the survey will ask providers for needs assessments, their answers will be subjective and may not be comprehensive. The study team will use data from the BLS to create proxies for local labor market needs. These will be combined with information collected from respondents regarding their own skills to analyze the skills gap.

First, the study team will construct two indicators of worker skills using a series of survey questions on education and occupation. A common approach to determining skill level is to use

⁵ Note this refers to the mandatory or voluntary SNAP E&T programs not to OMB's definition of mandatory and voluntary requirements.

education to determine groupings: (1) “skilled” is defined as those who have started or completed postsecondary education and (2) “low-skilled” is defined as those who have high school completion or below. Education may not be the best proxy for skills, however, as someone with only a high school education could have worked his or her way up through a business over several years or had multiple job assignments, such as in construction, and gained many skills. Furthermore, low-income populations, such as SNAP recipients, tend to have low educational attainment, which would make it difficult to analyze differences that may actually exist in the population along an educational attainment indicator. Therefore, the study team will also develop a secondary indicator that will categorize respondents by occupation labor group. This indicator will differentiate the types of skills—manual, skilled manual, professional, and others.

Then, using data collected from a combination of the QCEW and ACS, the study team will identify the dominant industries available in the area, determine the current local unemployment rate, and ascertain the types of occupations of those working there. The study team will compare this information to the worker indicators to determine if the skills and occupations work registrants and SNAP E&T participants reported in the survey align with the opportunities available. Although not a perfect measure, this will identify where there may be gaps between current skills and available jobs. Using QCEW data, the study team will also compare the types of industries and occupations in each area that exist over a period of three years to determine if there are any major shifts in the number of employees or types of industries in the area. This could indicate industries have left the area or that new occupations (possibly requiring additional skills) have entered or grown.

The study team will supplement this information with SNAP E&T provider survey data and focus group data from SNAP E&T participants. On the provider survey, program providers will be asked for information about the types of employers that are hiring in the area and the skills needed to obtain those jobs. The study team will use this information to give context to the secondary data. In addition, during the focus groups, the study team will ask participants in more detail about their skills and training needs, as well as their impressions of the availability of work in the area and what is necessary to obtain those jobs. These discussions will provide context and richer detail on the results of the survey analysis—however, the focus groups are not nationally representative, so the study team will be careful not to attribute the findings to the larger sample. Throughout this analysis, the study team will note any major discrepancies between the focus group findings and the survey data and will offer insights into possible reasons why there are differences.

The study team will also examine the challenges and obstacles faced by work registrants and SNAP E&T participants in obtaining and retaining employment. Using responses to the survey, the study team will tabulate the prevalence of reported barriers—including, mental or physical health issues, transportation costs and availability, dependent care costs and availability, language, literacy, immigration status, housing status, history of substance abuse and incarceration, gender, race, age, and sexual orientation—that registrants and participants may perceive as having prevented them from working or having limited their work opportunities (Instrument I.1). The study team will assess whether most respondents face a few or several barriers and examine the interaction across barriers, such as whether or not some barriers typically occur in tandem. Focus group findings will be used to provide additional details about types of barriers and how those barriers interfere with work.

Objective 3: Characteristics of the SNAP E&T service providers. Responses from the provider survey will form the basis for the analysis under objective 3. The study team will primarily describe the characteristics of the programs and providers—including, the type of organization; the role it plays in the larger state education and training structure; the population, cities, and counties served; and, the SNAP E&T program services and components provided. The study team will cross-tabulate these data to identify relationships between variables. For instance, we will tabulate the SNAP E&T program components by using certificates and degrees to indicate completion, minimum hours and expected duration, participant costs, targeted population, mandatory and voluntary participant count, and availability of follow-up services. In addition, the study team will analyze the cost of services provided to SNAP E&T program participants, including the provider’s various funding sources, the proportion of those they serve who are SNAP E&T program participants, the proportion of their overall funding focused on that population, any costs to participants for receiving services, and the average cost per participant and by component. These analyses will be presented by provider size and level of service to provide comparable costs across providers.

Because there will not be a one-to-one match of SNAP E&T participants who are respondents to SNAP E&T providers who are respondents, the study team will not directly link participant and provider survey data. However, we will have a sample of providers from the participants’ areas (based on sampling) and will be able to compare the services provided in an area with the types of services participants in that area indicated they have received and the types they would have liked to receive. This will give the study team a sense of major gaps between the two groups in this regard.

2. Schedule and publication plans

Findings from the SNAP E&T study will be presented in a final report and one user-friendly policy brief. Table A.16 shows the schedule for data collection and reporting.

Table A.16: Schedule for the SNAP E&T study

Activity	Date
Collect survey data:	
<ul style="list-style-type: none">• State recruitment and data collection	March 2014-April 2015
<ul style="list-style-type: none">• Survey advance letters	June 15, 2015
<ul style="list-style-type: none">• SNAP E&T Registrant and participant survey (A1-A7)	July 1, 2015
<ul style="list-style-type: none">• Provider survey (A8-A10)	August 1, 2015
<ul style="list-style-type: none">• Conduct focus groups	September 1, 2015
<ul style="list-style-type: none">• Final report	August 2016

A.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 approval number and expiration date will be displayed or cited on all forms completed as part of the data collection.

A.18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I" Certification for Paperwork Reduction Act."

No exceptions are necessary for this information collection.

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