

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

***An Assessment of the Roles and Effectiveness of
Community-Based Organizations in the
Supplemental Nutrition Assistance Program***

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Part A

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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 Agriculture to enter into contracts with private institutions to undertake research that will help to improve the administration and effectiveness of SNAP in delivering nutrition-related benefits.

To provide more timely and efficient services to the growing number of SNAP applicants, State and local SNAP offices are partnering with community-based organizations (CBOs) that have the capacity to conduct applicant interviews for SNAP. The Food and Nutrition Service (FNS) has approved these partnerships as part of a demonstration of “Community Partner Interviewer Projects.” Although these projects have existed for several years, they have never been fully evaluated. In order to assess the impact of these projects on SNAP performance, the U.S. Department of Agriculture’s (USDA) FNS is requesting Office of Management and Budget (OMB) approval to collect information from participating SNAP offices and partnering CBOs, as well as from a sample of SNAP participants. The sample of SNAP participants will be drawn from the population of SNAP participants who applied for SNAP in selected demonstration counties in the survey reference period. The reference period for participants who were interviewed by a CBO is October 1, 2012 through March 31, 2013. The reference period for local SNAP office-interviewed cases is January 1, 2013 through March 31, 2013.

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 support research that assesses the roles and effectiveness of CBOs that are serving as representatives of the SNAP State agencies during the SNAP interview. Although all States participating in the demonstration provide FNS with periodic reports on required performance measures, much remains to be learned about the nature of the partnerships between SNAP and CBOs in the States, how those partnerships vary by State, how the CBOs differ in terms of target populations and services offered, and how they provide SNAP-related services. FNS will use the information gathered for this study to address these questions, and to assess the extent to which the involvement of CBOs in the SNAP interview process has impacted program outcomes, such as timeliness and payment accuracy.

The information collection for which this OMB approval is requested includes a customer satisfaction survey and in-depth interviews with staff at State or local agencies and CBOs. The specific research objectives are to:

1. Describe the CBOs conducting SNAP interviews and the nature of their partnerships with State and local SNAP agencies.
2. Describe the response of State SNAP staff to the involvement of CBOs in conducting applicant interviews.
3. Describe the response of CBO interviewers to their involvement with SNAP.
4. Describe the responses of SNAP applicants who are interviewed by CBO staff to the involvement of CBOs in SNAP.
5. Describe the services that the CBOs offer.

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6. Document the impacts of CBOs conducting SNAP interviews on program outcomes.

The information collected through in-depth interviews will address objectives 1, 2, 3, and 5. The information collected through the customer satisfaction survey will address objective 4. FNS plans to address objective 6 using administrative data provided by States. The administrative data request will include variables needed to assess program outcomes for State-interviewed applicants versus partner-interviewed applicants, such as timeliness and efficiency. The instructions for submitting data files and the list of requested variables can be found in Attachment D. Data from the interviews and the survey will be used for the purposes of this study only, and will not be shared with any other agencies or entities outside of USDA.

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 survey of SNAP clients will be conducted by computer-assisted telephone interviewing (CATI). This method offers an efficient way to reach a large number of respondents when the sampling frame is large and includes sufficient contact information. Although low-income populations may be prone to having disconnected or temporarily nonworking telephone numbers, we expect most of the phone numbers from the SNAP application files to be recent, and thus more likely to be accurate, because data collection will begin within a relatively short period of time following the participants' application for SNAP.

Interviews with State SNAP directors and CBO directors will be conducted by phone. The in-depth interviews with State, local agency, and CBO staff will be conducted in person. Because the contractor has established a working relationship with each State's representative

during the planning phase, we do not anticipate any difficulties in gaining their cooperation when we request an interview. State SNAP directors will be asked to provide a list of SNAP local offices in the counties where the CBOs are currently conducting SNAP applicant interviews. If the director is willing to provide further assistance, we will also ask him or her to introduce the study to an individual at each of the local offices who can help in scheduling the interviews. If not, we will ask either the State SNAP directors or the local office SNAP staff to provide the names and contact information for director-level representatives at each CBO.

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 reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies and the information required for this study is not currently reported to State Agencies on a regular basis in a standardized form.

This is the first study of its kind. The Community Partner Interview Demonstration Projects have been in place for several years but have not been formally evaluated. FNS has not previously tried to isolate the impact of the eligibility interview location (i.e., SNAP office or CBO) on program outcomes, thus the information to be collected in this study does not exist elsewhere.

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. The CBO partners in each State are fairly large and established and do not meet the definition of small entities.

Regardless of the CBO size, all efforts will be made to minimize the impact of the data collection by keeping the interviews at a reasonable length and by scheduling data collection at times that are most convenient to the respondents. The States involved in this data collection effort have been implementing SNAP in partnership with CBOs; therefore, as the SNAP entities currently maintain the information required for this data collection, the impact to these entities will be minimal.

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 one 15-minute telephone survey for each sampled SNAP participant and 1-hour interviews with State, local agency, and CBO staff in each State. No respondent will be asked to participate in more than one interview. If these interviews are not conducted, USDA will not have critical information for assessing the impact of the demonstrations.

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;

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- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
 - requiring respondents to submit more than an original and two copies of any document;
 - requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
 - in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
 - requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
 - that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
 - requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5.CFR 1320.5.

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
- b. Consultations Outside of the Agency

The notice required by 5.CFR 1320.8(d) was published in the Federal Register on Monday, May 14, 2012 in Volume 77, Number 93, pages 28349 – 28350, and provided a 60-day period for public comment. No relevant public comments were received.

FNS consulted with David Hancock at the National Agricultural Statistics Services (NASS) about the design, level of burden, and clarity of instructions for the collection. Edwin Anderson serves as a NASS OMB Clearance Officer in the Survey Development and Support Branch. His telephone number is (202) 720-5617.

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 State, local agency, or CBO respondents. SNAP participants who participate in the interview will be offered a \$10 gift card as a token of our appreciation. The cards will be mailed to the respondents following the interview.

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. SNAP participants will be informed that their

responses to the survey will have no impact on their SNAP benefits. Interviewed CBO personnel will be informed that their participation will have no impact on their organization's involvement in the demonstration project. Interviewees will also be assured that no individually identifiable information will be included with any response and the identity of respondents will not be provided to USDA. Furthermore, the link between any response and any individual will be secured by USDA's contractor 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 State, local agency, and CBO interviews) and ICF International data collection staff (who will conduct SNAP customer satisfaction surveys) are required to sign a data confidentiality pledge 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. Please see Attachment E for a copy of the data confidentiality pledge.

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 instrument 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. As part of the consent process, respondents will be informed that they may choose not to answer any specific questions.

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 interviews with: 4 State SNAP directors (one per State); 11 CBO directors (7 in Florida, 1 in Michigan, 2 in Nevada, and 1 in Texas); up to 16 local SNAP office directors (up to 4 per State) and up to 16 SNAP eligibility workers (4 per State); and up to 32 CBO workers who are responsible for conducting SNAP applicant interviews (two per site with up to four sites selected in each State).

Additionally, we plan to survey a sample of SNAP participants. The target population for this survey includes all SNAP participants who applied for SNAP in selected demonstration counties in the survey reference period. The reference period for participants who were interviewed by a CBO is October 1, 2012 through March 31, 2013. The reference period for local SNAP office-interviewed cases is January 1, 2013 through March 31, 2013. Note that the survey will cover all SNAP participants, not all SNAP applicants, to control for any bias in satisfaction scores due to denial of the application.

Completed SNAP participant telephone interviews of 15 minutes each are planned for 500 participants per State (250 who interviewed with State/local agency staff and 250 who interviewed with CBO staff), for a total of 2,000 completed SNAP participant surveys. Finally, we will request administrative data extracts from each of the four States at two different points in

time, and will require an estimated 8 hours of programmers' time per extract. The table below illustrates the burden level.

Table A.12-1. Total Burden Hours on the Public

Respondent Type	Respondent Description	Instrument	Responsive						Non-Response					Total Burden Hours
			Sample Size	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	
State and Local Government	State SNAP Director	Interview recruitment email (A.1A)	4	4	1	4	0.05	0.2	0	1	0	0	0	0.20
		Phone Interview (A.1B)	4	4	1	4	1	4	0	1	0	0	0	4.00
	State IT Staff	Request letter with instructions for preparing data files (D)	4	4	1	4	0.25	1	0	1	0	0	0	1.00
		Administrative data request (No instrument)	4	4	2	8	8	64	0	2	0	0	0	64.00
	Local SNAP agency director	Interview recruitment email (A.3A)	16	16	1	16	0.05	0.80	0	1	0	0	0	0.80
		In-person interview (A.3B)	16	16	1	16	1	16	0	1	0	0	0	16.00
	Local SNAP agency staff	In-person interview (A.4)	16	16	1	16	1	16	0	1	0	0	0	16.00
Non-Profit Business	CBO Director	Interview recruitment email (A.2A)	11	11	1	11	0.05	0.55	0	1	0	0	0	0.55
		Phone interview (A.2B)	11	11	1	11	1	11	0	1	0	0	0	11.00
	Local CBO Staff	In-person interview (A.5)	32	32	1	32	1	32	0	1	0	0	0	32.00
Individuals / Households	SNAP participants (Adults, 18+ years of age)	Pre-test Telephone Survey	9	9	1	9	0.25	2.25	0	1	0	0	0	2.25
		Pre-survey notification letter (F)	2,858	2715	1	2715	0.02	54.30	143	1	143	0	0	54.30
		Phone Survey (C)	2,715	1086	1	1086	0.25	271.50	1629	1	1629	0.08	130.32	401.82
		- Survey follow-up call #1	1629	325.80	1	325.80	0.25	81.45	1303.20	1	1303.20	0.08	104.26	185.71
		- Survey follow-up call #2	1301	260.64	1	260.64	0.25	65.16	1040.36	1	1040.36	0.08	83.23	148.39
		- Survey follow-up call #3	1042	208.07	1	208.07	0.25	52.02	833.93	1	833.93	0.08	66.71	118.73
		- Survey follow-up call #4	834	119	1	119	0.25	29.75	715	1	715	0.08	57.20	86.95
Total			2950	2807	1.73	4845.51	.142	701.99	1772	3.2	5664.49	0.08	441.72	1143.70

Note: There is no burden associated with the 143 nonrespondents to the pre-survey notification letter, based on the assumption that the letter will not reach these sample members.

Note: Frequency of response and total annual response includes responses to all notifications, instruments, and follow-ups.

Note: Survey follow-up calls have an estimated 20% response rate until target of 2,000 responses is achieved.

Table A.12.2 below illustrates the estimated annualized cost to respondents for the hours of burden for this data collection. For State SNAP directors and CBO directors, with a median hourly wage rate of \$45.74, the total cost burden would be \$720.41 (\$192.11 for four State SNAP directors and \$528.30 for up to 11 CBO directors) for completed interviews. For State programmers, with a median hourly wage of \$34.92, the total cost burden would be \$2,269.80. For local SNAP agency directors, with a median hourly wage of \$28.20, the total cost burden would be \$473.76. For local SNAP agency staff (i.e., SNAP eligibility workers), with a median hourly wage of \$19.74, the total cost burden would be \$315.84. For local CBO staff, with a median hourly wage of \$13.82, the total cost burden would be \$442.24. For sampled SNAP participants, the hourly wage rate is represented by the weighted minimum wage in each State in 2012, which is \$7.67 in Florida, \$7.40 in Michigan, \$7.25 in Nevada, and \$7.25 in Texas. The table below illustrates the maximum possible cost burden for respondents.

Table A.12-2. Annualized Cost to Respondents

Respondent Description	Instrument	Total Burden Hours	Hourly Wage Rate	Respondent Cost
State SNAP Director	Interview recruitment email (A.1A)	0.20	\$ 45.74 ¹	\$ 9.15
	Phone Interview (A.1B)	4.00	\$ 45.74	\$ 182.96
State IT Staff	Request letter with instructions for preparing data files (D)	1.00	\$ 34.92 ²	\$ 34.92
	Administrative data request (No instrument)	64.00	\$ 34.92	\$ 2,234.88
Local SNAP agency director	Interview recruitment email (A.3A)	0.8	\$ 28.20 ³	\$ 22.56
	In-person interview (A.3B)	16.00	\$ 28.20	\$ 451.20
Local SNAP agency staff	In-person interview (A.4)	16.00	\$ 19.74 ⁴	\$ 315.84
CBO Director	Interview recruitment email (A.2A)	0.55	\$ 45.74	\$ 25.16
	Phone interview (A.2B)	11.00	\$ 45.74	\$ 503.14
Local CBO Staff	In-person interview (A.5)	32.00	\$ 13.82 ⁵	\$ 442.24

1 Based on the median hourly wage for General and Operations Managers (11-1021), retrieved from <http://www.bls.gov/oes/current/oes111021.htm>.

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

3 Based on the median hourly wage for Social and Community Service Managers (11-9151) retrieved from <http://www.bls.gov/oes/current/oes119151.htm>.

4 Based on the median hourly wage for eligibility workers, government programs (43-4061) retrieved from <http://www.bls.gov/oes/current/oes434061.htm>.

5 Based on the median hourly wage for Social and Human Service Assistants (21-1093) retrieved from <http://www.bls.gov/oes/current/oes211093.htm>.

SNAP participants (Adults, 18+ years of age)	Survey pre-test	2.25	\$ 7.39	\$ 16.63
	Pre-survey notification letter (F)	54.30	\$ 7.39	\$ 401.28
	Phone Survey (C)	401.82	\$ 7.39	\$ 2,969.45
	- Survey follow-up call #1	185.71	\$ 7.39	\$ 1,372.37
	- Survey follow-up call #2	148.39	\$ 7.39	\$ 1,096.59
	- Survey follow-up call #3	118.73	\$ 7.39	\$ 877.43
	- Survey follow-up call #4	86.95	\$ 7.39	\$ 642.56
Total		1143.70		\$11,598.35

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.

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 total cost to the Federal Government is \$669,461. 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, as well as the time spent by the federal project officer to manage the data collection. The average annualized cost is \$219,154 for the contractor and \$4,000 for the federal project officer (GS 13-Step 10).

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 1143.70 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.

Data from the customer satisfaction survey will be tabulated in SAS, and results will be presented in tabular form. For the satisfaction questions, tables will indicate the percent of respondents who reported each level of satisfaction. For questions about customer service, tables will indicate the percent of respondents who reported each level of agreement or disagreement with statements about the quality of services provided through a SNAP office or a CBO.

In-depth interviews will be recorded, transcribed, and analyzed using NVivo 10 software. 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 director interview, local SNAP eligibility worker interview, CBO director interview, and CBO staff/volunteer interview) may share many of the same themes, we plan to adapt each coding scheme to match the specific purposes of each interview. Every coded interview will identify the State and the data source for purposes of analysis.

The draft coding schemes will be developed prior to data collection, based on the research questions and interview protocols. Once we have obtained actual data from the interviews and site visits, we will code two transcripts per interview type before finalizing the coding schemes.

The schedule for data collection, analysis, and reporting is shown in Table A.16-1 below.

Table A.16-1. Project Time Schedule

Activity	Expected Activity Period
Develop and Test Data Collection Instruments	June-October 2012
Conduct Surveys	April-September 2013
Data Analysis	October-November 2013
Submit Final Report to USDA	March 2014

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.