

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

**COMMUNITY PARTNER INTERVIEW DEMONSTRATION PROJECT**

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*Part A*

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**APPENDIX A: SNAP LOCAL AGENCY DIRECTOR EMAIL**

**APPENDIX B: CLIENT SATISFACTION SURVEY - ENGLISH**

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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 revision of a currently approved data collection for the Food and Nutrition Service to describe the roles of community-based organizations (CBOs) in the Supplemental Nutrition Assistance Program (SNAP), and to assess if, and how, the use of CBOs to conduct SNAP applicant interviews impact SNAP program outcomes such as timeliness, payment error rates, access, and client satisfaction across five States.

To provide more timely and efficient services to 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.” In 2015, FNS released a report that assessed whether the use of CBOs to conduct SNAP applicant interviews had an impact on SNAP program performance. Specific program outcomes included efficiency, payment accuracy, and client satisfaction. FNS has revised and extended the demonstration projects to continue the assessment the impact of these SNAP-CBO partnerships on SNAP program outcomes and is seeking to collect additional data from the five States that are participating in the demonstration.

## **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.

FNS will solely conduct the data collection for this information collection. This request will not use any contractors. The purpose of this information collection is to support research that assesses the roles and effectiveness of approximately 10 CBOs that are serving as representatives of the 5 SNAP State agencies with FNS-approval to implement a Community Partner Interview demonstration. Approximately 3,452 SNAP applicant interviews using Client Satisfaction Survey (using Appendix B and C) will be conducted in English or Spanish. SNAP applicants will be selected by CBO staff to complete the survey after conducting the eligibility interview with the CBO staff. FNS will use the information gathered for this study to assess the extent to which the involvement of CBOs (business organizations) in the SNAP interview process has impacted program outcomes, such as timeliness and participant satisfaction.

The information collection request includes a voluntary Client Satisfaction Survey (Appendix B and C) that will be administered by the CBO staff at the time of eligibility interview and a data spreadsheet in Excel format (Appendix E titled Data Collection Spreadsheet) to be completed and submitted by the States twice per year. We have asked a local partnering CBO in each of the 5 State to pilot-test the survey under our guidance with one SNAP applicant that they interview for a total of 5 individuals. The total number of individuals involved with the pilot-test was 10. No changes were made to the survey after pilot-testing. The specific research objectives are to:

1. Describe the application experience of SNAP applicants who are interviewed by CBO staff.
2. Document the impacts of CBOs conducting SNAP interviews on program outcomes.

The information collected through the customer satisfaction survey will address objective 1 and the data collected via the data spreadsheet will address objective 2. The instructions for submitting the required data can be found in Appendix D.

### **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.

Although, FNS is committed to compliance with the E-Government Act, 2002, the recipient organization may use their information technologies to collect this information where feasible. The data spread sheet will be in MS Excel format and will be submitted via email to FNS twice per year. This data collection does not deploy any web-base system.

### **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.

This data collection is similar to, but is a smaller scale of the current data collection for which an extension is sought. The data collected under this modified extension will provide information on SNAP applicant's satisfaction with being interviewed by a CBO staff and the effect of CBO staff conducting eligibility interviews on program outcomes. This is the only effort in place to collect these data.

### **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.

There are no small businesses involved in this data collection. FNS has determined that the requirements for this information collection do not adversely impact small businesses or other

small entities. The 10 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 survey short. CBO staff will administer the survey immediately after the applicants receive assistance from them. Therefore, no additional burden will be placed on the CBO staff to schedule a time for the survey data collection. 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 on 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.

This is an ongoing data collection. The information collection proposed for this study consists of one 5-minute in-person survey administered by CBO staff to each sampled SNAP participant. If these data are not collected, FNS will not be able to ensure program integrity and we will not have critical information to assess 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;
- 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 was published in the Federal Register on Monday, December 1, 2015 in Volume 80, Number 23077, pages 75044 – 75045. One public comment was received and responded to (Appendix G and H).

#### **Consultations Outside of the Agency**

FNS consulted with Brian Richardson at the National Agricultural Statistics Services (NASS) about the design, level of burden, and clarity of instructions for the collection. David

Hancock serves as a NASS OMB Clearance Officer in the Survey Development and Support Branch. His telephone number is (202) 720-5617. Additionally, FNS consulted with Karen Nelson-Huss – Minnesota, Program Consultant, MN Department of Human Services and Darlene Dougherty – Nevada, SNAP-Ed Nutrition Specialist and SNAP Outreach Coordinator about the availability of data, design, level of burden, and clarity of instructions.

#### **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 any participant of the study.

#### **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 privacy of the 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. Furthermore, there will be no link between any response and any individual participant in the study.

#### **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 survey questions are unlikely to be considered sensitive by respondents. None of the questions in the survey address 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.

FNS is requesting 558.72, rounded up to 559 burden hours and 6,852 responses for this data collection. We plan to contact 3,477 respondents (including non-respondents). The affected publics involved in this data collection are: Individuals and Households (3,457 SNAP participants), State Agencies (5 Local SNAP Offices) and Business' (10 Community Based Organizations (CBOs). FNS plans to reach out to a specific number in order to participate in this data collection. Some will refuse to participate in part or full; therefore, the burden estimates include burden estimates for respondents and non-respondents and are shown in Table A.12.1. The estimate of burden for the client survey is based on a pretest including 1 SNAP participant. We plan to survey a sample of individuals and households who are 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 May 16, 2016 through May 15, 2019.

Completed SNAP applicant face-to-face survey of 5 minutes each are planned for 676 to 677 participants per State, for a total of 3,384 completed SNAP applicant surveys. We anticipate approximately 68 participants will refuse to complete the survey in part or in full, for a total of 3,452 attempts. Finally, we will request administrative data extracts from each of the 5 States twice per year, and will require an estimated 1 hour of programmers' time per extract. The administrative data will be recorded and submitted in the Data Collection Spreadsheet (Appendix E). The table below illustrates the burden level.

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

			RESPONDENTS						NON-RESPONDENTS							
Description Respondent	Instrument Type of Survey	Instrument	Sample Size	Respondents Number of	Response (annually)	Total Responses Annual	per Respondent Average Hours	Burden (hours) Estimated Annual Subtotal	Non-respondents - Number of Estimated	Response Frequency of	Total Responses	Response (hours) Average Time per	(hours) Annual Burden Total Estimated	Burden Estimate Grand Total	Rate** Hourly Wage	Respondent Annual Cost to Estimate Total
<b>SNAP APPLICANTS</b>																
SNAP applicants	Face-to-face survey	Face-to-Face Survey	3452.00 <sup>3</sup>	3384	1.00 <sup>1</sup>	3384.00 <sup>3</sup>	0.08 <sup>0</sup>	276.16 <sup>2</sup>	68.00 <sup>6</sup>	1.00 <sup>1</sup>	68.00 <sup>6</sup>	0.02 <sup>0</sup>	1.36 <sup>1</sup>	277.52 <sup>2</sup>	\$7.25	2012.02
SNAP applicants pretest burden hours	Face-to-face survey	Face-to-face survey	5	5	1.00	5.00	0.08	0.40	-	-	-	-	-	0.40	7.25	2.90
<b>Subtotal unique individuals/households</b>			<b>3457.00</b>	<b>3389.00</b>	<b>1.00</b>	<b>3389.00</b>	<b>0.08</b>	<b>276.56</b>	<b>68.00</b>	<b>1.00</b>	<b>68.00</b>	<b>-</b>	<b>1.36</b>	<b>277.92</b>	<b>-</b>	<b>2014.92</b>
<b>LOCAL SNAP OFFICE STAFF</b>																
Local SNAP office staff	Report administrative data	Excel sheet	5.00 <sup>5</sup>	5.00 <sup>5</sup>	2.00 <sup>2</sup>	10.00 <sup>1</sup>	1.00 <sup>1</sup>	10.00 <sup>1</sup>	0.00 <sup>0</sup>	0.00 <sup>0</sup>	0.00 <sup>0</sup>	0.08 <sup>0</sup>	0.00 <sup>0</sup>	10.00 <sup>1</sup>	\$42.57	425.70
<b>Subtotal local SNAP office staff</b>			<b>5.00</b>	<b>5.00</b>	<b>2.00</b>	<b>10.00</b>	<b>1.00</b>	<b>10.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>-</b>	<b>0.00</b>	<b>10.00</b>	<b>-</b>	<b>425.70</b>
<b>CBO STAFF</b>																
CBO staff	Administer face-to-face survey	Face-to-Face Survey	10.00 <sup>1</sup>	10.00 <sup>3</sup>	338.00 <sup>1</sup>	3380.00 <sup>3</sup>	0.08 <sup>0</sup>	270.40 <sup>2</sup>	0.00	0.00	0.00	0.00	0.00 <sup>0</sup>	270.40 <sup>2</sup>	\$35.00	9464.00
CBO staff pretest burden hours	Administer face-to-face survey	Face-to-Face Survey	5.00	5.00	1.00	5.00	0.08	0.40	-	-	-	-	-	0.40	35.00	14.00
<b>Subtotal CBO staff</b>			<b>15.00</b>	<b>15.00</b>	<b>339.00</b>	<b>3385.00</b>	<b>-</b>	<b>270.80</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>270.80</b>	<b>-</b>	<b>9478.00</b>
<b>Grand total</b>			<b>3477.00</b>	<b>3409.00</b>	<b>12.05</b>	<b>6784.00</b>	<b>0.08</b>	<b>557.36</b>	<b>68.00</b>	<b>1.00</b>	<b>68.00</b>	<b>0.10</b>	<b>1.36</b>	<b>558.72</b>	<b>-</b>	<b>11918.62</b>

Total # of respondents (including participants and non): 3409+68=3477  
 Total # of annual responses (including participants and non): 6784+68=6852  
 Total annual burden estimates (including participants and non): 557.36+1.36=558.72

Table A.12.2 below illustrates the estimated total annualized cost to respondents including pretesting (\$11,918.62) for the hours of burden for this data collection. For local SNAP agency staff (i.e., SNAP eligibility workers), with a median hourly wage rate of \$42.57, the total cost burden would be \$425.70. For local CBO staff, with a median hourly wage of \$35.00, the total cost burden would be \$9,478.00. For sampled SNAP participants, the hourly wage rate is represented by the most salient 2016 minimum wage among the five participating States, which is \$8.05 in Florida, \$8.50 in Michigan, \$7.25 in Nevada, \$7.25 in Minnesota, 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
Local SNAP agency staff	In-person interview (A.4)	10.00	\$42.57 <sup>1</sup>	\$425.70
	Survey pre-test	0.40	\$35.00	\$14.00
Local CBO Staff	In-person interview (A.5)	270.40	\$35.00 <sup>2</sup>	\$9,464.00
SNAP participants (Adults, 18+ years of age)	Survey pre-test	0.40	\$7.25	\$2.90
	Face-to-Face Survey (C)	277.92	\$7.25	\$2014.92
<b>Total</b>		<b>558.72</b>		<b>\$11,918.62</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>1</sup> Based on the median hourly wage for eligibility workers, government programs (43-4061) retrieved from <http://www.bls.gov/oes/current/oes434061.htm>.

<sup>2</sup> Based on the median hourly wage for Social and Human Service Assistants (21-1093) retrieved from <http://www.bls.gov/oes/current/oes211093.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 total cost to the Federal Government is \$167,365. This total includes costs associated with the study design, instrument development, information collection, analysis, reporting, and presentation/publication of the results. This information collection also assumes that a total of 20 hours of Federal employee time: for a GS-13, Step 10, Social Science Researcher at \$57.21 per hour for a total of \$11,442.30 and Federal staffing cost of \$676.87 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2011.).

#### **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 revision of a currently approved information collection in which we are requesting 558.72 burden hours and 6,852 responses. The current OMB approved burden is 1,323 and 15,205 total annual responses. This revision reflects a decrease of 764.28 burden hours and 8,353 total annual responses due to program changes to the data collection design.

#### **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 SPSS, 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 the CBOs.

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 Instrument	May 2016
Conduct Surveys	2 weeks after OMB approval - March 2019
Data Analysis	April - May 2019
Final Report	June 2019

**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.