

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-NEW**

***Identifying Program Components and Practices that Influence  
SNAP Application Processing Timeliness Rates***

***SNAP Timeliness Study***

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## **Part A: JUSTIFICATION**

### **A1. 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.**

The Food and Nutrition Service (FNS) is responsible for administering the Supplemental Nutrition Assistance Program (SNAP) at the Federal level according to provisions of the Food and Nutrition Act of 2008, as amended (the Act),<sup>1</sup> and Title 7 of the Code of Federal Regulations (CFR)<sup>2</sup>. See Appendix A for the full text of the Food and Nutrition Act of 2008. SNAP offers nutrition assistance to millions of eligible low-income individuals and families and provides economic benefits to communities. SNAP is the largest program in the domestic hunger safety net and is a central component of American policy to alleviate hunger and poverty. During fiscal year 2015, the program served nearly 46 million people in an average month at a total annual cost of almost \$70 billion in benefits. By including SNAP benefits in income, SNAP was estimated to keep 4.9 million Americans — including 2.2 million children — out of poverty in 2011. Similarly, the program also had an outstanding impact on the poorest of Americans, reducing the number of Americans in extreme poverty by half—from 1,600,000 to 857,000 in 2011.<sup>3</sup>

Sections 11(e)(3) and 11(e)(9) of the Act require that States process initial SNAP applications and provide benefits within 30 days of the application date, or within 7 days for expedited applications. Application processing timeliness (APT) is a critical measure of program

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<sup>1</sup> <http://www.fns.usda.gov/sites/default/files/snap/Food-And-Nutrition-Act-2008.pdf>

<sup>2</sup> <http://www.gpo.gov/fdsys/granule/CFR-2011-title7-vol4/CFR-2011-title7-vol4-sec274-2>

<sup>3</sup> Melissa S. Kearney and Benjamin H. Harris. Hunger and the Important Role of SNAP as Part of the American Safety Net. November 22, 2013. <http://www.brookings.edu/blogs/up-front/posts/2013/11/22-hunger-snap-safety-net-kearney-harris>

access and performance. In order to measure timeliness, FNS monitors compliance with statutory requirements through the SNAP Quality Control System (SNAP-QC). The APT rate is the percentage of approved SNAP initial applications that were approved timely within the 7 or 30-day SNAP statutory processing requirements, divided by the total number of approved applications for a given time period. SNAP-QC calculates an APT rate for each State on a quarterly and annual basis. FNS uses quarterly APT rates, annual APT rates, and onsite case reviews to determine a States' adherence to timeliness standards. While 100 percent compliance with the 30-day and 7-day application processing standards has long been the stated requirement, FNS practice has been to consider 95 percent and above on the upper bound of the 95 percent confidence interval as acceptable performance. While many States have worked to improve the administration of SNAP, the national average for application processing timeliness (APT) has remained below 90 percent for the last several years with the majority of States struggling to meet statutory and regulatory requirements. Courts have affirmed the importance of timely processing in cases where clients have sued State agencies for failure to process their applications within statutory guidelines.<sup>4</sup> In an effort to improve SNAP administration, FNS has provided technical assistance and training to State and local representatives in business process reengineering (BPR) techniques to improve the administration of SNAP in three counties in Colorado, and state-wide in Nebraska and Tennessee. With the *Identifying Program Components and Practices that Influence SNAP Application Processing Timeliness Study (The SNAP Timeliness Study)*, FNS will build on prior work done by examining the impact of the adoption of modernized practices, new technology, and reengineered business processes on timeliness in all 50 States and the District of Columbia to identify those associated with acceptable or

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<sup>4</sup> Food Research and Action Center. *Getting Food Stamps to Hungry Families on Time: Federal Rules and the High Performance Bonus for Timeliness*. September 2005. <http://frac.org/wp-content/uploads/2009/09/timeliness.pdf>.

improved APT rates. These findings will help FNS understand why many States have not been able to achieve the legislated program efficiency measure to provide benefits within 30 days of the application dates (or within 7 days for expedited applications).

## **A2. PURPOSE AND USE OF THE INFORMATION**

**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.**

This is a one-time, voluntary data collection. This study builds upon prior studies sponsored by FNS that examined how administrative practices and application processing procedures affect APT rates.<sup>5,6</sup> While prior studies provide some promising evidence that modernizing or reengineering improves SNAP application processing, a more comprehensive study that includes a larger, representative sample of States and local offices is needed to provide a better understanding of how policies and practices affect APT rates. The *SNAP Timeliness Study*, sponsored by FNS, will survey all 50 States and the District of Columbia to collect comparable information from all States about the use of SNAP policies, waivers, administrative practices, and workflow processes. Through the use of the data collection instruments (Appendices B1 and B2), data that will be collected about State SNAP policies and operational procedures will be used to develop profiles of how each State administers SNAP. The study's sample of all States will enable the identification of the common policies and procedures in operation in States with acceptable APT rates. This study will also survey all local offices in six States to understand how local offices operations may affect APT rates within the selected

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<sup>5</sup> U.S. Department of Agriculture, Food and Nutrition Service. *Timeliness in the SNAP Application Process*, Summer 2013. [http://www.fns.usda.gov/sites/default/files/timeliness\\_app\\_process.pdf](http://www.fns.usda.gov/sites/default/files/timeliness_app_process.pdf).

<sup>6</sup> Baretto, Tina. *Business Process Reengineering: Final Outcomes Report*. Prepared by IMPAQ International, LLC for the U.S. Department of Agriculture, Food and Nutrition Service, September 2015.

States. The six States selected for the local office survey provide a mix of high performing States and States that have improved their APT rates in recent years. It should be noted that the local office survey findings are not generalizable to the universe of all States.

As part of their effort to help States achieve statutory timeliness requirements, FNS recently conducted a survey of nine States, *Timeliness in the SNAP Application Process*,<sup>5</sup> to identify policy options and operational procedures associated with high APT rates. FNS sponsored another separate project, *Business Process Reengineering*,<sup>6</sup> that provided training and technical assistance for business process reengineering in three States to improve streamlined application procedures and customer service. Another FNS study, *The Evolution of SNAP Modernization Initiatives in Five States*,<sup>7</sup> looked at SNAP modernization initiatives to see if the adoption of new technology (e.g., switching from paper to online applications) improved APT rates. FNS also has conducted a number of demonstrations that have examined the impact of waiving different SNAP policies (e.g., the required in-person interview of SNAP applicants) on timeliness. The results of these studies have been mixed. In some cases, the studies found that waiving certain requirements that were expected to shorten application processing time, actually increased it.

The study team pre-tested the *SNAP Timeliness Study* Survey Instrument with a Study Advisory Board between February 22, 2016 and March 2, 2016. Members of the Board were asked to complete the survey either online or by telephone and then provide feedback about the survey instrument. In total, nine State agencies were invited to participate in the pretest survey for which we are seeking OMB approval. Eight respondents completed the survey: seven

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<sup>7</sup> U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, *The Evolution of SNAP Modernization Initiatives in Five States* by Lara Hulsey, Kevin Conway, Andrew Gothro, Rebecca Kleinman, Megan Reilly, Scott Cody, and Emily Sama-Miller. Project Officer, Rosemarie Downer. Alexandria, VA: March 2013. <http://www.fns.usda.gov/evolution-snap-modernization-initiatives-five-states>

completed the online survey and the survey was administered by telephone to one respondent.

Nearly all respondents reported that they did not have difficulty answering any questions due to question wording. The majority of respondents reported that they did not have difficulty answering questions due to a lack of familiarity with the aspects of the SNAP program the questions addressed. However, many respondents reported that they were not involved in all of the initiatives implemented during the study period. Most had to consult with other staff members or research the implementation dates for policies, modernization efforts, demonstration projects and BPR initiatives. Consequently, most respondents also noted that questions regarding implementation and end dates for demonstration projects, modernization efforts, and business process reengineering initiatives were not readily available. Respondents relied on other staff members, email archives, policy implementation memos, archived policies, demonstration project documents, State options reports, and departmental memos to identify and report accurate dates. Other feedback recommended including dates prior to October 2012 in addition to the study time frame when reporting demonstrations, policies, and modernization efforts that may have started before October 2012, but were still in operation for some time during the study period. In addition, because respondents reported that they were not able to accurately rate the effectiveness of different initiatives due to lack of data that documented their effect on timeliness, the study team deleted follow-up questions from the survey since they do not provide a reliable measure of effectiveness. This also will reduce the length of the survey.

Findings from this study will allow FNS to gain a better understanding of the State and local offices' SNAP policies and practices that promote or hinder timely SNAP application processing. The study will administer the *SNAP Timeliness Study* Survey Instrument to the directors of State SNAP agencies in all 50 States and the District of Columbia and all local

SNAP management staff within selected States, obtain copies of policy and procedure manuals, and request summary administrative information.

Using the *SNAP Timeliness Study* Survey Instrument (Appendices B and C), data will be collected to address the following study objectives:

- Objective 1: Describe each State’s SNAP policy and operational procedures
- Objective 2: Identify the policy and operational procedures that may impede or facilitate SNAP application processing timeliness for certifying new applications
- Objective 3: Describe the associations between State policy and operational procedures and APT rates

### **A3. 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.**

FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. The study team anticipates that this data collection will be 90 percent electronic submission, approximately 10 percent will be collected via telephone interview. Survey respondents will complete a web-based survey (see Appendices B1 and B2) that will be programmed using Snap Survey Software.<sup>8</sup> This data collection method will reduce the time burden for respondents and allow them to complete the survey at their convenience and to save their responses and complete the survey at a later time. The web-based survey will be delivered to all State-level respondents, on the same day and submitted immediately after completion, a distinct advantage for a survey of 50 States and the District of Columbia. The survey will be

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<sup>8</sup> Snap Survey Software is a commercial survey programming tool used to program survey instruments for online administration.



delivered to local agency management staff following the State-level survey. Respondents can return their completed survey electronically, which eliminates the need for them to mail a hard-copy survey. This web-based survey features skip patterns, which reduce the burden on respondents because they do not have to read through questions they are not required to answer. The software also requires a response before moving to the next question which reduces the amount of missing data and identifies errors so that respondents can correct them before moving on to the next question. This method is the most cost-efficient for surveying the population for this study, who are professionals with access to the Internet and computers in their offices. For these reasons, the study will rely on web technology to recruit the target survey population, sending survey invitations (see Appendix E) via e-mail, and providing a link for respondents to access the survey posted on the Internet and then electronically submit completed surveys at <https://www.snapsurveys.com/wh/s.asp?k=145577273350>.

#### **A4. EFFORTS TO IDENTIFY DUPLICATION. 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.**

Prior FNS studies have examined the effect of modernization of State SNAP administrative practices and business process reengineering;<sup>5,6,7</sup> however, the samples for these prior studies were very small and these studies did not look at the relation between modernization initiatives and APT rates. The survey data collected for the comprehensive *SNAP Timeliness Study* will not duplicate data collected for prior FNS studies because they did not collect comparable data from all the States and did not document policies and practices in operation during the same time period.

The *SNAP Timeliness Study* is designed to profile the use of modernized practices, new

technology, and reengineered business processes in all 50 States and the District of Columbia and to examine the interaction of policies and new practices on APT rates. To conduct this more comprehensive study of factors that affect APT rates, comparable information about State policies and practices must be collected from all 50 States and the District of Columbia. Prior to designing the survey for this study, the study team reviewed the following information to avoid collecting information that is already available: (a) prior FNS studies of modernization and business process reengineering initiatives;<sup>6,7</sup> (b) FNS reports documenting policies, waivers, and options in operation in the States; and (c) FNS and State SNAP websites to identify existing information about State policies and practices in operation. The study team found some information about administrative procedures needed for the study in the *State Options Report (Eleventh and Twelfth Editions)*, the *2014 State Activity Report*, and the *SNAP Workload Management Matrix* downloaded from the FNS website. Study participants will not be asked to compile and submit any of the data identified in these sources. The study team will download copies of State policy manuals from State websites if these are available online.

In addition, the study team interviewed the a State SNAP administrators participating in the Study Advisory Board about the availability of information on State policies and application processing procedures available in extant State/local documents or websites. Because these State SNAP administrators could not confirm that the information contained in their State documents was consistently reliable and complete, the study team included questions about these policies and procedures in the survey instrument.

#### **A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES**

**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.**

No small businesses will be involved in this study.

#### **A6. 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 a one-time only data collection. If this data collection is not conducted, those responsible for administering SNAP at the Federal, State, and local levels will continue existing policies and procedures that have not resulted in timely SNAP application processing as required by Sections 11(e)(3) and 11(e)(9) of the Food and Nutrition Act of 2008. Results of the proposed study will identify best practices and procedures that promote timely application processing.

#### **A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES 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.**

This information collection fully complies with 5CFR 1320.5

## **A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION**

**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.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

A 60-day Federal Register Notice was published in the Federal Register on April 25, 2016, vol. 81, No. 79; pp. 24054-57. See Appendix F. There were no public comments.

The study team requested voluntary participation from nine States to serve as Study Advisory Board members to provide recommendations on data collection procedures and to pre-test the web-based survey instrument between February 22 and March 2, 2016. The Study Advisory Board participated in one conference call to discuss their respective State policies; SNAP application processing procedures; what State and local administrative data existed and how to obtain them; and finally, what types of staff should be included in a representative sample. The study team worked with the FNS SNAP Regional Offices to select States to participate on the Study Advisory Board that represented each SNAP region, APT status, level of SNAP administration, and SNAP caseload size. Listed in Table A8 below are the State agencies and representatives that participated as subject matter experts and consultants for the instrument design.

**Table A8. Subject Matter Experts and Consultants**

<b>Name</b>	<b>Contact Information</b>
Kathy Bruen, Manager, Quality Assurance & Accountability Section, Minnesota Department of Human Services (online),	Tel: (651) 431-3942 Email: Kathy.Bruen@state.mn.us
Kathryn Hendrix, Office of Social Services, Texas Health and Human Services Commission (online)	Email: kathryn.hendrix@hhsc.state.tx.us
Catherine Buhrig, Director, Bureau of Policy, Department of Human Services, Pennsylvania(online)	Tel: (717) 787-4081 cbuhrig@pa.gov
Babette Roberts, Director of Community Service Division, Washington (online)	Tel: (360) 725-4888 Email: roberba@dshs.wa.gov
Ron Roberts, SNAP Director, Connecticut (online)	Tel: (860) 424-5135 Email: ron.roberts@ct.gov
Suzanne Tryan, SNAP Policy Director, Indiana (online)	Tel: (317) 234-8708 Email: suzanne.tryan@fssa.in.gov.
Lena Wilson, Director of Food and Energy Assistance, Colorado (online)	Tel: 303-866-2535 Email: lena.harris-wilson@state.co.us
Cathy Sykes, SNAP Director, Mississippi (telephone)	Tel: (601) 359-4888 Email: cathy.sykes@mdhs.ms.gov

In addition, Sarah Goodale with the National Agricultural Statistical Service’s Summary, Estimation, and Disclosure Methodology Branch reviewed Part A and Part B of this OMB Clearance Package.

**A9. EXPLAIN ANY DECISIONS TO PROVIDE 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 provided to respondents.

**A10. ASSURANCES 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 records maintained by a Federal agency according to either the individual's name or some other identifier. State and local agency staff participating in this study will be notified that the information they provide will not be published in a form that identifies them. No identifying information will be attached to any reports. Identifying information will not be included in the public use dataset. Names and phone numbers, or any other unique identifier, will not be linked to the data.

The study will require State and local agency administrators to provide information and program administrative information similar to that used for annual performance assessments conducted by State and Federal agencies. The study respondents are State and local employees who will participate in the study as agency representatives and provide information that pertains to their State or local SNAP policies and procedures. The survey instrument does not require the disclosure of any sensitive data or any information that could identify or be linked to individual recipients of SNAP benefits. The survey will not collect the names of or any personal identifiers for survey respondents (State and local employees).

Instructions for the survey will inform respondents that their identities and information will be kept private to the maximum extent allowable by law and the study team will not attribute specific information provided to individual respondents. All trained study team members have signed a Data Confidentiality Agreement. See Appendix G.

The study's design methods and instrumentation were reviewed by the WRMA Institutional Review Board (IRB) Coordinator. The IRB determined that the study is exempt from full IRB panel review because the study is subject to the approval of Federal and State

agency heads and it is designed to examine how States administer SNAP, a public benefits program, to identify possible administrative changes that will enable States to achieve the legislatively-mandated timeliness rates. See Appendix H for the IRB Exemption Form.

#### **A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE**

**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 does not include questions of a sensitive nature.

#### **A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION**

**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.**

**A. 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.**

Potential respondents will include 51 State SNAP directors (or designees) of all 50 States and the District of Columbia, a total of 301 local SNAP agency managers, and State SNAP agency staff who participated on the Study Advisory Board and pre-tested the survey instrument. Study participation will involve completing a web-based survey (or optional telephone interview) once annually, and providing program administrative information and procedure manuals to the study team. Details are provided in Table A12.A.

**Table A12.A. Estimates of Hour Burden to Respondents and Non-Respondents**

Respondent Description	Type of Data Collection	Instrument	RESPONDENTS						NON-RESPONDENTS					GRAND TOTAL
			Sample Size	Estimated Number of Respondents	Frequency of Response (Annually)	Total Annual Responses	Average Hours per Response	Subtotal Estimated Annual Burden (Hours)	Estimated Number of Non-Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (Hours)	Subtotal Estimated Annual Burden (Hours)	Grand Total Annual Burden Estimates (Hours)
<b>STUDY ADVISORY BOARD</b>														
Study Advisory Board	Complete pre-test online survey or telephone interview	Pre-test survey instrument	9	8	1	8	1.17	9.36	1	1	1	0.08	0.08	9.44
<b>LOCAL SNAP OFFICE STAFF</b>														
Local SNAP Agency Manager	Review and respond to communications		301	240	1	240	0.16	38.40	60	1	60	0.16	9.8	48.2
Local SNAP Agency Manager	Report administrative information and documents	Excel sheet	301	240	1	240	0.50	120.0	60	1	60	0.00	0.00	120.00
Local SNAP Agency Manager	Complete online survey or telephone interview	Survey instrument	301	240	1	240	1.17	280.80	60	1	60	0.00	0.00	280.80
<b>Subtotal Local SNAP Office Staff</b>			<b>301</b>	<b>240</b>	<b>1</b>	<b>240</b>	<b>1.83</b>	<b>439.20</b>	<b>60</b>	<b>1</b>	<b>60</b>	<b>0.16</b>	<b>9.60</b>	<b>449.00</b>
<b>STATE SNAP AGENCY STAFF</b>														
State SNAP Director	Review and respond to communications		51	41	1	41	0.16	6.56	10	1	10	0.16	1.60	8.16
State SNAP Director	Report administrative information and documents	Excel sheet	51	41	1	41	0.50	20.50	10	1	10	0.00	0.00	20.50
State SNAP Director	Complete online survey or telephone interview	Survey instrument	51	41	1	41	1.17	47.97	10	1	10	0.00	0.00	47.97
<b>Subtotal State SNAP Director</b>			<b>51</b>	<b>41</b>	<b>1</b>	<b>41</b>	<b>1.83</b>	<b>75.03</b>	<b>10</b>	<b>1</b>	<b>10</b>	<b>0.16</b>	<b>1.60</b>	<b>76.63</b>
<b>GRAND TOTAL</b>			<b>361</b>	<b>289</b>	<b>1</b>	<b>289</b>	<b>4.83</b>	<b>523.59</b>	<b>71</b>	<b>1</b>	<b>71</b>	<b>0.40</b>	<b>11.28</b>	<b>535.07</b>



**B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Using the Bureau of Labor website (bls.gov), Table A12.B below illustrates the estimated annualized cost to respondents for the hours of burden for this data collection. For State SNAP directors, with a median hourly wage rate of \$42.57, the total cost burden would be \$2,914.77. For local SNAP agency managers, with a median hourly wage of \$42.57, the total cost burden would be \$17,062.06

**Table A12.B. Annualized Cost to Respondents**

Respondents	Instrument	Total Burden Hours	Hourly Wage Rate	Respondent Cost	Non Respondent Cost
Survey Instrument Pre-Test	Survey/Telephone Interview	9.44	\$42.57	\$398.45	\$3.40
Review and Respond to Communications		44.96	\$42.57	\$1,913.95	\$485.30
State SNAP Directors	Survey/Telephone Interview, Administrative Information, and Documents	68.47	\$42.57 <sup>9</sup>	\$2,914.77	\$0.00
Local SNAP Office Managers	Survey/Telephone Interview, Administrative Information, and Documents	400.80	\$42.57 <sup>10</sup>	\$17,062.06	\$0
<b>Total</b>		<b>535.07</b>	<b>\$42.57</b>	<b>\$22,289.23</b>	<b>\$488.70</b>

**A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN**

**Provide estimates of the total annual cost burden to respondents or recordkeepers 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.**

There is no other cost to respondents beyond what is discussed in A12.

<sup>9</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>10</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>.

#### **A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT**

**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 average annualized cost is \$395,515.50 for the contractor. Using the Federal Wage Salary 2016, the average annualized cost for the Federal project officer is \$48,375.60. The total average annualized cost is \$443,891.10.

The total cost to the Federal Government for all data collection activities by the contractor is \$922,869.52 over 28 months. These costs include study design, preparation of the OMB clearance submission, survey instrument development, study participants' recruitment, and all aspects of data collection, analysis, and reporting. Using the Federal Wage Salary 2016, the Federal project officer, a GS-13-Step 10, will spend approximately 2,250 hours over 28 months to manage the data collection, costing the Federal Government \$112,876.40.

#### **A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS**

**Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This is a new information collection which will add 535.07 burden hours and 289 responses to the FNS OMB inventory.

#### **A16. 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.**

The study team will collect data via the web-based survey (or optional telephone

interview) during approximately a 6-month period. After the data collection, the study team will analyze the data according to the crosswalk between study objectives and research questions, relevant variables, and proposed analytic methods presented in Appendix I. This crosswalk serves as a starting point and roadmap for data analysis, but can be modified easily as data are received and analyses evolve.

The study team will conduct quantitative analyses to summarize all variables using statistical packages such as SPSS or Stata. The study team will calculate descriptive statistics to describe the central tendencies and variation in data across the States. For binary variables, the analyses will indicate the percentage of States that have implemented a certain policy, procedure, practice, or initiative. For other categorical variables, the study team will calculate quartiles, medians, and modal values, as appropriate.

After analyzing the data using descriptive statistics, the study team will use bivariate analysis methods, and possibly multivariate methods, to examine associations between State policies and procedures with SNAP APT rates, SNAP APT status (acceptable, borderline acceptable, unacceptable), and SNAP APT status over time. To examine two categorical variables, the study team will use Chi-Square and other appropriate tests of association (such as Fisher's exact test) to assess if there is an association between the implementation of a particular policy or procedure and APT status. To examine the association of SNAP APT rate with a particular State policy or procedure, the study team will use t-tests to compare the mean APT for States that have implemented the policy or procedure to those that have not.

Most of the data collected to inform the study will be quantitative. In almost all instances, the instrument provides a list of probable question responses and an opportunity to expand the list in "other, specify" fields, recognizing the likelihood that the list does not include all possible

responses. Technically, these are open-ended questions because the respondent is not constrained to a closed set of responses. However, these questions merely augment the list and so can be coded as new variable values and analyzed using the traditional set of non-parametric techniques. Parametric or non-parametric, the data and subsequent analysis is quantitative.

However, there are eight open-ended questions, which will generate unbounded responses.

- Q.4a. What barriers have limited your State in fully developing your online application or online management capabilities?
- Q.5. Describe business processing reengineering initiatives related to SNAP certification processing.
- Q.7a. and Q.L13a. Please describe the workflow analyses of process management strategies your State/office implemented.
- Q.8a. and Q.L14a. Please briefly describe the performance-based incentives your State/office used.
- Q.9a. and Q.L15a. Please briefly describe the performance-based penalties your State/office used.
- Q.10. and Q.L16. What existing policies, business processes, or modernization features have a positive or negative effect on APT?
- Q.11. and Q.L17. What additional policies, business processes, or modernization features could be implemented to improve APT?
- Q.12. and Q.L18. What are the biggest barriers to improving APT?

Each of these questions may generate responses easily coded into categorical responses. However, we fully expect that they will more likely generate richer qualitative data; responses that may portray a rich tapestry of variable interactions that do not lend themselves to categorical description or quantitative analysis. For example, a respondent may answer the first question by writing:

“The online system is initially appreciated by our clients, except that they frequently must return to the system and re-enter all of their answers.”

This answer may indicate a problem with the online tool, it may indicate a problem with

the management information system with which the tool must interface, or both. A qualitative data coder might note this response (code it) as a data management issue, especially if other respondents provide answers that ambiguously point to the online application as the source of an issue. This contextual assessment by the coder is frequently termed “Grounded Theory” coding.

Grounded Theory is usually attributed to Glaser and Strauss (*The Discovery of Grounded Theory: Strategies for Qualitative Research, 1967*). As opposed to traditional deductive inference which collects facts after developing an abstract theory, it puts theory secondary to the collection of facts. The theory, then, is grounded in the data as opposed to the data being grounded in the theory.

Qualitative coders examine each open-ended response, sentence-by-sentence, and ask what the sentence is about. What does it describe? In doing so, they create labels, not variable values and thus the application of grounded theory should not be confused as a data reduction exercise. The data are used in full form to generate theory. At least two coders will review the same open-ended responses and meet regularly to compare their labels and determine where they overlap so they describe labels consistently. The coders will then enter the variable labels and codes into a database using ATLAS.ti qualitative software so that similarities and differences across respondents can be indexed and used to develop the theory from the qualitative analysis of the responses. The coders will develop the theory by ensuring labels are inclusive and can be arranged into a hierarchy of general categories according to importance. In such a way, coders will summarize findings across States and within States where all local offices are surveyed.

Pursuant to analyzing the data, the study team will submit a final report to FNS. The report will include an executive summary, an overview of the study and study methods, a discussion of study findings, limitations, qualification and remaining issues. The study team will

also present findings in a briefing to FNS staff. FNS anticipates publishing the final report on the FNS website. The schedule for data collection, analysis, and reporting is shown in Table A16 below.

**Table A16. Project Time Schedule**

<b>Subtasks / Deliverables</b>	<b>Start Date</b>	<b>Delivery Date</b>
Recruit State SNAP Agencies for Pre-Test/Advisory Group	12/11/2015	2/12/2016
State Recruitment Memorandum	2/19/2016	2/26/2016
Program Web-Based Survey	12/21/2015	1/7/2016
Conduct Survey Pre-Test	1/8/2016	1/22/2016
Draft Memorandum on Pre-Test Results	1/22/2016	2/12/2016
Final Survey Instrument	2/19/2016	2/26/2016
Final Memorandum on Pre-Test Results	2/26/2016	3/11/2016
60-Day Federal Register Notice Comment Period	4/25/2016	6/25/2016
OMB Review	8/1/2016	1/2/2017
Finalize Programming of Web-Based Survey	1/2/2017	1/20/2017
Final Data Collection Training Manual for Study Team	11/18/2016	12/9/2016
Select/Train Data Collectors	1/6/2017	1/13/21017
Recruit Remaining State SNAP Agencies	1/13/2017	4/28/2017
Collect Data	1/13/2017	6/26/2017
Conduct Data Analysis	5/26/2017	8/11/2017
Final Data Analysis Tables	7/28/2017	8/11//2017
Final Outline of Final Report	8/11/2017	8/252017
First Draft of Final Report	8/25/2017	10/62017
Final Report	12/8/2017	12/29/2017
Final Briefing Slides	11/10/2017	11/17/2017
Briefing	11/24/2017	11/24/2017
Final Public-Use Data Files, Codebook, Documentation	1/12/2018	1/26/2018

**A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE**

**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 number and Expiration date will be displayed on every form/instrument.

**A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19**

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

There are no exceptions to the certification.