

APPENDIX H: INSTITUTIONAL REVIEW BOARD EXEMPTION FORM

**Institutional Review Board
EXEMPTION FROM REVIEW FORM**

Date: 3/4/2016

Study Title: Supplemental Nutrition Assistance Program (SNAP) Application Processing Timeliness (APT) Rates Study

Principal Investigator/Project Director: Dr. Margaret Camarena

1. Purpose of Project: The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture has contracted with WRMA to conduct a study of SNAP application processing timeliness as part of its continuing effort to improve States' administration of the program. The study's purpose is to examine States' and the District of Columbia's SNAP policies, waivers, administrative practices, and processing procedures and to identify those that are associated with high APT rates or improved APT rates.

2. Describe the human subjects and how they will be involved: Participation in the study will require state, county and local agency administrative staff to complete an online or telephone survey. The survey includes questions about: SNAP policies; waivers; administrative practices; processing procedures and variation in the handling of regular and expedited applications; case assignment models and methods; modernization of procedures; use of new technology; business process reengineering initiatives; and agency leadership support for changes in practices. Participation in the survey is voluntary. State, county and local agency staff will complete the survey during work hours and it is estimated to take [fill in number of minutes after pre-test] minutes to complete it. No personal identifiers will be collected or linked to the completed surveys and the results will be reported in the aggregate only. The findings will be used by FNS to help States to improve service delivery so that they can administer SNAP efficiently and achieve the legislatively mandated acceptable APT rate.

3. List the data files and data elements to be accessed and/or analyzed: No data about individual human subjects will be accessed or analyzed. Administrative data that provide measures of county/local office SNAP APT performance; SNAP caseload; application volume for regular, expedited, and pending cases; local office staff-to-applicant ratios; and call center volume and average wait/talk time will be requested from county and local SNAP agencies. State and county/local agencies will be asked to provide documents containing information about policies, waivers to federal regulations, processing procedures, and management evaluations. If any of these administrative data are available from publicly accessible Federal, State, and county/local agency websites, they will be downloaded.

Select the pertinent exemption category that applies to your project and provide a brief explanation.

Research conducted in established or commonly accepted educational settings, involving normal educational practices, such as (i) research on regular and special education instructional strategies, or (ii) research on the effectiveness of or the comparison among instructional techniques, curricula, or classroom management methods.	<input type="checkbox"/>
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Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures or observation of public behavior, unless: (i) information obtained is recorded in such a manner that human subjects can be identified, directly or through identifiers linked to the subjects; and (ii) any disclosure of the human subjects' responses outside the research could reasonably place the subjects at risk of criminal or civil liability or be damaging to the subjects' financial standing, employability, or reputation.	<input type="checkbox"/>
Research involving the use of educational tests (cognitive, diagnostic, aptitude, achievement), survey procedures, interview procedures, or observation of public behavior that is not exempt under the second bullet above if: (i) the human subjects are elected or appointed public officials or candidates for public office; or (ii) Federal statute(s) require(s) without exception that the confidentiality of the personally identifiable information will be maintained throughout the research and thereafter.	<input type="checkbox"/>
Research involving the collection or study of existing data, documents, records, pathological specimen, or diagnostic specimens, if these sources are publicly available or if the information is recorded by the investigator in such a manner that subjects cannot be identified, directly or through identifiers linked to the subjects.	<input type="checkbox"/>
Research and demonstration projects which are conducted by or subject to the approval of department or agency heads, and which are designed to study, evaluate, or otherwise examine: (i) public benefit or service programs; (ii) procedures for obtaining benefits or services under those programs; (iii) possible changes in or alternatives to those programs or procedures; or (iv) possible changes in methods or levels of payment for benefits or services under those programs.	<input checked="" type="checkbox"/>

Brief Explanation: The SNAP application processing timeliness study is one of a series of research studies commissioned by the Food and Nutrition Service as part of its ongoing effort to improve the provision of supplemental food benefits to those in need throughout the U.S. Because many States continue to fail to achieve legislatively-mandated acceptable APT rates, the study will collect survey and administrative data that describe the SNAP state policies and local procedures used by local offices so that those in operation in States with acceptable and unacceptable APT rates can be compared and those procedures that promote higher APT rates identified. The study builds on prior FNS-funded research and will extend the findings of prior studies by including the total population of States (as well as the District of Columbia) rather than a small sample of States. Because the study is funded by FNS for the purpose of improving administrative efficiency of SNAP, research design and methodological decisions and tasks are subject to agency review and approval. The study qualifies as exempt from full IRB panel review because: the study is designed to identify possible procedural improvements to SNAP, a program that provides public benefits, and is subject to review/approval by the Federal agency that administers the program.