SUPPORTING STATEMENT PART A FOR

OMB Control Number 0584-NEW

Assessment of the Barriers that Constrain the Adequacy of Supplemental Nutrition Assistance Program (SNAP) Allotments

Contract Officer Representative: Rosemarie Downer

USDA, Food and Nutrition Service

3101 Park Center Drive

Alexandria, VA 22302

Table of Contents

Appendices

Tables

Part A Justification

A.1 Circumstances Making the Collection of Information Necessary

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new information collection request.

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), and Title 7 of the Code of Federal Regulations (CFR)[8]. See Appendix U. The Supplemental Nutrition Assistance Program (SNAP) is the largest in-kind federal assistance program for low-income individuals and households. It has a dual purpose of alleviating food insecurity and supporting healthy eating for these individuals by

8 http://www.fns.usda.gov/sites/default/files/snap/Food-And-Nutrition-Act-2008.pdf

supplementing household income. SNAP benefits are intended to supplement household funds for food purchase and are based on US Department of Agriculture’s (USDA) Thrifty Food Plan (TFP), which is USDA’s most inexpensive plan specifying the cost to purchase foods necessary to provide adequate nutrition. While TFP is intended to determine the SNAP benefits that are adequate to meet the objectives of the program, there exists some significant differences in diets between low-income households and those with higher incomes. SNAP participants, like income-eligible nonparticipants, have diets that fall far short of the *Dietary Guidelines for Americans 2015*.

The USDA Food and Nutrition Service (FNS) sponsored a study by the Institute of Medicine (IOM) and the National Research Council (NRC) to examine the feasibility of establishing an objective, evidence-based means of defining SNAP benefit adequacy. The IOM committee report concluded that the adequacy of SNAP allotments can be objectively defined and recommended that

FNS assess the individual, household, and the environmental factors that limit the adequacy of the SNAP allotment. This study, "*Assessment of the Barriers That Constrain the Adequacy of SNAP Allotments*" is designed to meet these five research objectives:

1. Determine the individual and household barriers faced by SNAP participants that prevent them from having access to a healthy diet throughout the month.
2. Determine the environmental barriers faced by SNAP participants that prevent them from having access to a healthy diet throughout the month.
3. Describe the interaction between individual, household, and environmental barriers.
4. Determine how, if at all, the individual, household, and environmental barriers can be accounted for in determining SNAP allotments.
5. Among the most frequently reported barriers, describe in more detail the nature of the barriers and what coping strategies are used by households to overcome the barriers.

This two-phase study will utilize a mixed-methods design; phase I involves conducting a national survey of 4,800 SNAP participants out of 6,593 initially contacted and phase II involves in-depth interviews with 120 SNAP participants out of 216 initially contacted to meet research objective #5.

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.

This one-time, voluntary data collection will begin 2 weeks after OMB clearance. All research questions in the "*Assessment of the Barriers That Constrain the Adequacy of SNAP Allotments*" study will be answered by surveys of a sample of SNAP participants and in-depth interviews.

Data collection package

- **State Agency Administrative Case Record Data**: Data on SNAP recipients will be collected from States. Specifically, a sample of 26 States will be selected. Data use agreements will be made with these States. Four months before the start of the survey, sampled States will send the research team data files containing information on SNAP participants who have been in the program for at least the previous 6 months. Information includes name, address, phone numbers, household size, presence of children, date benefit started, and amount of monthly benefit.

- **Food and Your Household Survey**: SNAP participants will be selected based on a two-stage sampling plan detailed in the Supporting Statement Part B. SNAP participants selected for the study will be asked questions about their shopping patterns, knowledge and attitudes about healthy diets, barriers to purchasing foods to ensure they eat a healthy diet, coping strategies when resources are limited, participation in nutrition assistance programs, and household characteristics. The Food and Your Household survey was cognitively tested with 8 SNAP participants (3 males and 5 females between ages 22 to 58), to assess clarity of questions and administration time. The burden of the pretest was 30 minutes per participant. The survey was revised based on cognitive testing results, with the burden reduced to 25 minutes.
- **Data collection procedures are as follows**: At the onset of the study, a packet containing an invitation letter written in English and Spanish (Appendix A.1 and A.2), either a $2 pre-incentive [1] or no pre-incentive (see further discussion on incentive experiment in A.9), Food and Your Household survey (Appendix B.1), and postage-paid return envelope will be mailed to sampled participants. The Spanish letter

[1][1] Our experience from previous studies including the Farmers Market Client Survey indicates that a small non-contingent incentive has a positive effect on response rates.

will include instructions to call the toll-free number to request a Spanish language survey (Appendix B.2), if preferred. FNS believes the use of a cash incentive is appropriate in this study, as a way to ensure high survey response rates among the study population of low-income households and to ensure reliable and generalizable results.

- One week after the initial mailing, participants who have not returned the survey will receive an automated telephone call reminding them to complete and return the survey (Appendices C.1 and C.2). Next, three weeks after the initial mailing, a FedEx package will be sent to non-responding participants to underscore the importance of the study (Appendices D.1 and D.2). The FedEx package will include a reminder letter with a toll-free number they can call to complete the survey by phone, the hard copy survey, and postage-paid envelope. One week after the 2nd mailing, all non-responding participants will receive an automated telephone reminder call (Appendices E.1 and E.2). About three weeks after the second mailing, telephone data collectors will attempt to contact sampled participants who have not returned the survey and those with bad addresses and try to complete the survey by phone (Appendices F.1, F.2, G.1, and G.2). In the event that the interviewer is unable to speak with a person, interviewers will leave a voice message along with a toll-free number for respondents to call and complete the survey at their convenience (Appendices H.1 and

H.2). A thank you letter with a $20 cash incentive will be mailed to participants after completing the survey (Appendices I.1 and I.2).

- **In-depth interviews**. Participants for in-depth interviews will be chosen from 8-12 geographic locations from among those who completed the "**Food and Your Household**" survey (Appendices Q.1 and Q.2), based on their representation of the following analytic categories of interest: food security, rural-urban location, geographical region, and phase of the benefit month. In the event that recruitment from among the survey sample yields less than the expected number of SNAP participants, an advertisement will be placed on Craig's List to recruit additional respondents (Appendices J.1 and J.2). These additional respondents will not complete the Food and Your Household Survey but will meet the same criteria as those who did complete the survey (participation in SNAP). Selected SNAP participants will participate in an in-person interview and provide information on their food choices, options, and preferences; their perceptions of a healthy diet; the extent to which they provide and receive food assistance from others in their social networks; and where and why they usually shop for food. SNAP participants will also be asked to narrate a "tour" or guided description of their kitchen and eating spaces.
- **Data collection procedures for the in-depth interviews are as follows**: Potential in-depth interviewees will be contacted by

telephone to complete a screener, and if eligible, to participate in an interview lasting approximately 90 minutes, in their home (Appendices K.1 and K.2). Those who agree to participate in the interviews will be sent a confirmation email about the date and time of the interview (Appendices L.1 and L.2). Any respondents without email will be sent a copy of the appointment by mail. One week prior to the appointment, the respondent will be reminded of the appointment via email or a phone call (Appendices M.1 and M.2), followed by a telephone reminder one day before the scheduled interview (Appendices N.1 and N.2). Because we anticipate that there will be some no-shows, we will maintain a “reserve” of 4 to 6 SNAP participant potential interviewees for each location. Reserve interviewees will be contacted, screened for eligibility and then asked if they would be available to “stand-by” should a respondent cancel. If some selected respondents do cancel prior to the scheduled interview, new respondents will be selected from this reserve sample (Appendices O.1 and O.2). Written informed consent for the interview will be obtained from all participants (Appendices P.1 and P.2). Interviews will be conducted in respondents’ homes and be tape-recorded with permission and transcribed (Appendices P.1 and P.2). If necessary, interviews may be conducted outside the home at a private location such as a library, if requested by the respondent after the appointment has been scheduled. All those who complete the in-depth interviews will receive $75 at the end of the interview.

Purpose of the Information: The information will be a valuable asset to policymakers, SNAP Program Staff, health professionals, and the research community. Policymakers and SNAP Program Staff will use the findings to design and shape the program to help meet participants' health and nutrition needs. Researchers will be able to further analyze the study data and contribute to the knowledge base regarding SNAP participants' barriers to purchasing and consuming healthy foods.

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.

This study offers technology-based options to respondents to ease burden, as described below.

Automation of Participant Data Collection. In compliance with E-Government Act 2002, to reduce burden to the respondent and improve data quality, for the estimated 17% of the study participants who do not complete the hard copy survey, the survey will be conducted using the computer-assisted telephone interview (CATI) technology. The use of CATI reduces the survey completion time for telephone surveys as automated skip patterns are built into the program to ensure that respondents are asked only relevant questions, based on their response. The branching and skip patterns applied by the system will prevent staff from mistakenly skipping sections, or asking the wrong questions during interviews. We expect approximately 83% of the study respondents to complete a paper copy of the survey. The survey will be formatted to ensure ease of use and will have clear directions that will assist the participant to ensure that they are only answering relevant questions, based on their responses.

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 are no data similar to that proposed for collection in this study. Every effort has been made to avoid duplication. The data requirements for the study have been carefully reviewed to determine whether the needed information is already available. In our review, we identified several studies involving SNAP participants that examined how SNAP participants make food shopping decisions, how environmental barriers shape their food choices, and individual level barriers to healthy eating, particularly those involving SNAP participants. None of these studies were national in scope; most were conducted in limited geographic areas. The current survey is designed to include a nationally representative sample of SNAP households. In addition, unlike other studies, the current survey will collect information on individual, household, and environmental barriers that affect SNAP participants' access to healthy diets along with in-depth interviews for a subsample of survey respondents. Thus, combining the survey data with the in-depth interview data will provide valuable information on factors affecting SNAP participants' ability to purchase and consume healthy diets.

A.5 Impacts Small Business or Other Small Entities

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The data collection plan has no impact on small businesses or other small entities.

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 request for clearance is to conduct a one-time, voluntary data collection. If this information collection is not conducted, USDA/FNS will have limited understanding of the barriers that affect SNAP participants' access to healthy diets. These data are necessary to identify policy changes that could improve access for program participants to healthier foods.

A.7 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 surveys, 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 relating to the Guidelines of 5 CFR 1320.5 for this collection of information. This request fully complies with the regulation 5 *Code of Federal Regulations* 1320.5.

A.8 Responses to the Federal Register Notice and Efforts to Contact Outside Agencies

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.

FNS published a notice on October 11, 2016 in the Federal Register Volume 81, Number 196, pages 70088-70089 and provided a 60-day period for public comments. We received nine comments. **Appendix R.1A-R.1J** includes these comments and **Appendix R.2A-R.2D** includes the action taken by the agency in response.

Other reviewers include:

- John A. Kirlin, Ph.D., Assistant Deputy Director for SNAP Research, USDA, Economic Research.
- Alisha Jensen-Coleman, Ph.D., Social Science Analyst, USDA, Economic Research Service.
- The information has been reviewed by Doug Kilburg, Mathematical Statistician, of the Methods Branch of USDA's National Agricultural Statistics Service (NASS), with special reference to the statistical procedures. See the NASS comments in **Appendix Q3.**

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.

Providing survey and interview participants with a monetary incentive reduces non-response bias and improves representativeness, especially in populations defined as being in poverty.[1],[2],[3], [5] Additionally, incentives improve response rates and therefore the numbers of surveys and interviews completed. Having an adequate number of completed surveys and

[1][1] Singer E. (2002). The use of incentives to reduce non response in households surveys in: Groves R, Dillman D, Eltinge J, Little R (eds.) Survey Non Response. New York: Wiley, pp 163-177.

[2][2] James T. (1996). Results of wave 1 incentive experiment in the 1996 survey of income and program participation. Proceedings of the Survey Research Section, American Statistical Association., 834-839.

[3][3] Groves R, Fowler F, Couper M, Lepkowski J, Singer E. (2009) in: Survey methodology. John Wiley & Sons, pp 205-206.

[5][5] Singer E and Ye C. (2013). The use and effectives of incentives in surveys. Annals of the American Academy of Political and Social Science, 645(1):112-141.

interviews is essential to examining how barriers to healthy eating may vary by characteristics such as race, ethnicity, age, household size, and amount of SNAP benefits received. Incentives are an essential component of the multi-pronged approaches used to minimize non-response bias, especially in studies with hard-to-reach, low-income households such as those with children, elderly, and those residing in rural areas; receiving federal nutrition assistance benefits; [6] reduce efforts to locate hard-to-reach study participants; and lower overall survey costs and time to achieve completion rates without affecting data quality[7],[8].

FNS is requesting incentives for the survey and qualitative in-depth interviews. One possible method of providing an incentive is to include a small cash payment with the advance materials. The research on pre-paid incentives generally finds that small incentives, of approximately $1 or $2, have significant effects on mail[9] and

[6][6] Bonevski B, Randell M, Paul C, Chapman K, Twyman L, Bryant J, Brozek K, Hughes, C. (2014) Reaching the hard-to-reach: a systematic review of strategies for improving health and medical research with socially disadvantaged groups. BMC Medical Research Methodology 14:42, 14-42. http://bmcmedresmethodol.biomedcentral.com/articles/10.1186/1471-2288-14-42

[7][7] Dillman, Don. 2000. *Mail and Internet Surveys: The Tailored Design Method, 2nd Edition*. John Wiley & Sons: New York.

[8][8] Singer, Eleanor. 2006. "Introduction: Nonresponse Bias in Household Surveys," *Public Opinion Quarterly*. 70(5): 637-645.

9[] Church, Allan H. 1993. "Estimating the Effect of Incentives on Mail Survey Response Rates: a Meta-Analysis". *Public Opinion Quarterly* 57:62-79.

interviewer-administered surveys[10],[11]. This same research has found that there are smaller gains in response rate for pre-paid incentives above $2. For example, Trussell and Lavrakas[12] found a 13 point increase in response rate between $0 and $2, and a 6 point increase between $2 and $5. Similar differences between $2 and $5 for telephone surveys were found by Brick et al.[13] Recent research associated with the National Household Education Survey has found increases of 5 percentage points when comparing $5 to $20.

A second possible method is to promise the respondent a cash incentive for completing the survey. The research on promised incentives is not as definitive. In a meta-analysis of mail surveys, Church (1993) did not find a significant

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10[] Cantor., D., O'Hare, B. and O'Connor, K. (2007) "The Use of Monetary Incentives to Reduce Non-Response in Random Digit Dial Telephone Surveys" pp. 471-498 in J. M. Lepkowski, C. Tucker, J. M. Brick De Leeuw, E., Japec, L., Lavrakas, P. J., Link, M. W., & Sangster, R. L. (Eds.), *Advances In Telephone Survey Methodology,* New York: J.W. Wiley and Sons, Inc.

11 [] Singer, Eleanor, John Van Hoewyk, Nancy Gebler, Trivellore Raghunathan, and Katherine McGonagle. 1999. "The Effect of Incentives on Response Rates in Interviewer-Mediated Surveys". *Journal of Official Statistics* 15:217-230.

12[] Trussell, N. and P. Lavrakas (2004) "The influence of incremental increases in token cash incentives on mail survey responses. Is there an optimal amount?" *Public Opinion Quarterly,* 68(3): 349 – 367.

13[] Brick, J. Michael, Jill Montaquila, Mary Collins Hagedorn, Shelley Brock Roth, and Christopher Chapman. 2005. "Implications for RDD Design from an Incentive Experiment". *Journal of Official Statistics*. Forthcoming effect of small ($1, $2) promised incentives. In a meta-analysis of both telephone and personal interviewing, Singer found significant effects of promised incentives (Singer, et al. 1999). There has been more success when promising significantly more money when requesting to complete an extended interview of RDD respondents. For example, Strouse and Hall[14] did not find a significant effect of amounts in the $0 - $10 range, but did find a significant effect of $35. Cantor et al[15] report an effect of 9.1 percentage points when offering $20. Other studies have found amounts of $25 or more have been effective at the point of refusal conversion (Fesco, 2001).[16],[17]

There has been no research on the combination of a pre- and a promised incentive in program recipient populations. The proposed experiment seeks

14 Strouse, Richard C., and John W. Hall. 1997. "Incentives in Population Based Health Surveys". *Proceedings of the American Statistical Association, Survey Research Section*: 952-957.
15 Cantor, David, Kevin Wang, and Natalie Abi-Habib. 2003 "Comparing Promised and Pre-Paid Incentives for an Extended Interview on a Random Digit Dial Survey". *Proceedings of the American Statistical Association, Survey Research Section.*
16 Currivan, Doug. 2005. "The Impact of Providing Incentives to Initial Telephone Survey Refusers on Sample Composition and Data Quality". Paper presented at the Annual Meeting of the American Association of Public Opinion Research, Miami Beach, FL.
17 Olson, Lorayn, Martin Frankel, Kathleen S. O'Connor, Stephen J. Blumberg, Michael Kogan, and Sergei Rodkin. 2004. "A Promise or a Partial Payment: the Successful Use of Incentives in an RDD Survey". Paper presented at the Annual Meeting of the American Association of Public Opinion Research, Phoenix, AZ.

to answer the question, To what extent does the combination of a pre- and promised incentives increase response rates among SNAP recipients? The information learned from this experiment will inform decisions on incentives and the impact on response rates for future studies with similar study populations. The study will have two conditions:

Half of the sample will receive a $2 pre-incentive and a $20 post-incentive, while half of the sample will receive only a $20 post-incentive.

In order to improve representativeness and response rate, and minimize the cost of replacing “no-show” respondents, FNS is requesting that SNAP clients participating in the 90 minute qualitative interviews receive $75 after completing the in-depth in-home interview and guided description of the respondents’ kitchen. The eight SNAP clients who participated in the 60-minute cognitive testing session of the survey instrument for this study received $75 for their participation. This incentive was effective in securing interest in the interview from a variety or respondents with different background. Given the greater burden on respondents for the qualitative interview and the limited time that interviewers will be in the selected geographical areas to conduct the interviews, a larger incentive is necessary to obtain 120 completed qualitative interviews from a diverse group of respondents.

Survey Incentives Improve Sample Representativeness

Survey incentives can improve sample representativeness. Incentives encourage those less interested in research to participate,[9] including low-income respondents,[10] thereby reducing non-response bias.[11],[12] Several studies provide evidence that offering incentives may improve representation for low-education, low-income, and ethnic minority subgroups. For example, Singer et al.[13] noted that a $5 incentive received in advance brought in a disproportionate number of low-education respondents into the sample. Another experiment,[14] examining the impact of providing incentives to telephone survey non-respondents on sample composition and data quality in the New York Adult Tobacco Survey, found that offering an incentive to individuals who refused to participate in the survey led to increased proportion of respondents who were over age 55, did not have a college degree, and were not employed. Many of these subpopulations are represented in the SNAP universe.

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[9][9] Groves RM, Couper MP, Presser S, Singer E, Tourangeau R, Acosta G, Nelson L. (2006) Experiments in Producing Nonresponse bias. Public Opinion Quarterly. 70(5): 720-736

[10][10] Singer, E., and R.A. Kulka. "Paying Respondents for Survey Participation." In *Studies of Welfare Populations: Data Collection and Research Issues. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs,* edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press, 2002, pp. 105–128.

[11],[11] Groves, R., Singer, E., Corning, A. (2000). Leverage-saliency theory of survey participation: description and an illustration. *Public Opinion Quarterly*. 64(3): 299-308.

[12][12] Messer B and Dillamn D (2011). Surveying the general public over the internet using address-based sampling and mail contact procedures. *Public Opinion Quarterly*, 75:429-457.

[13][13] Singer E, Van Hoewyk J, Maher MP. (2000). Experiments with incentives in telephone surveys. Public Opinion Quarterly 64:171-188.

[14][14] Currivan D (2005). The impact of providing incentives to initial telephone survey refusers on sample composition and data quality. Prepared for the American Association of Public Opinion Research Annual Meeting in Miami, 2005.

None of the studies have examined how incentives mitigate non-response bias in surveys of SNAP participants. FNS is currently conducting three studies that include surveys of SNAP-participants and are providing survey completion incentives to respondents. The studies are:

- The USDA-FNS study Evaluation of Demonstration Projects to End Childhood Hunger (OMB control number: 0584-0603, expiration date: 8/31/2018) includes a survey with an estimated 30 minutes of burden. For this study, a $30 completion incentive was approved for the survey.
- The USDA- FNS study Evaluation of SNAP Employment and Training Pilots (OMB control number: 0584-0604, expiration date: 1/31/2019) involves surveying participants in the treatment and control groups after 12 months of participation and again after 36 months of participation. The estimated burden for the completion of each survey is about 30 minutes. A $30 completion incentive has been approved for the completion of the 12 month follow-up survey and a $40 incentive for the completion of the 36 month follow-up survey.
- The USDA-FNS study Evaluation of Food Insecurity Nutrition Incentives (OMB control number: 0584-0616, expiration date: 11/30/2019) involves surveying participants at baseline and again after 6 months of participation. The estimated burden for the completion of each survey

is about 20 minutes. A $2 pre-survey incentive and a $20 post-survey completion incentive have been approved.

All studies noted above will conduct a robust non-response bias analysis as most research studies currently are not achieving the desired 80 percent survey response rate. These studies as well as this study will contribute to the evidence-base.

Survey incentive experiments in future studies could be used to determine whether incentives help mitigate non-response bias within SNAP participant subpopulations, and if so, what level of survey incentives are most effective.

Survey Incentives Improve Response Rates

Empirical evidence also supports the use of survey incentives to improve response rates in addition to reducing non-response bias. In a meta-analysis of 40 studies, Messer and Dillman[15] reported findings of their experiments on response rates to multi-mode surveys and varying incentive amounts. Their findings demonstrate that offering a $5 pre-incentive and implementing a web-mail design yielded significant increase in response rates. In a recently completed meta-analysis, Mercer and colleagues[16] reported a 10 percentage point increase in response rates for mail surveys when participants were paid a $2 pre-paid incentives and 6 percentage point increase for phone surveys when participants were offered a $20 post-incentive. Similarly, research indicates that post-paid incentives improves responses to mail and interviewer-administered surveys.[10,11] For example, Cantor et al.[17] reported an effect of 9.1 percentage points when offering a post-incentive of $20 (compared to no incentive).

The Food and Nutrition Service (FNS) study: *Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants (FMCS)*[18] (OMB Control Number: 0584-0564; Discontinued November 30,

[15][15] Messer and Dillman, 2011.

[16][16] Mercer A, Caporaso A, Cantor D, Townsend R (2015). How much gets you how much? Monetary incentives and response rates in household surveys. *Public Opinion Quarterly*, 79:105-129.

[17][17] Cantor, David, Kevin Wang, and Natalie Abi-Habib. (2003). “Comparing Promised and Pre-Paid Incentives for an Extended Interview on a Random Digit Dial Survey.” *Proceedings of the American Statistical Association, Survey Research Section.*

[18][18] Karakus, Mustafa, MacAllum, Keith, Milfort, Roline and Hao, Hongsheng. *Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants*. Prepared by Westat for the U.S. Department of Agriculture, Food and Nutrition Service, October, 2014.

2014) involved survey data collection from SNAP participants; the respondent burden was comparable to the proposed burden for this study. The FMCS included an incentive experiment to examine the impact of a differential incentive on survey completion rates among SNAP participants. The estimated burden for completing the survey was 25 minutes. Survey completion rates ranged from 42.5 to 48.9 percent, with the highest response rate for the $5 initial (pre-paid or pre-survey) and $20 post survey completion incentive group (Table A.9.1). Response rates were approximately 6 percentage points higher in the $20 post survey completion incentive group than the $10 post survey completion incentive group.

Table A.9.1. Response Outcomes Varying the Pre-paid (initial) and Survey Completion (Post) Incentive Amounts

	Overall		$5 Initial/ $10 Post		$5 Initial/ $20 Post		$10 Initial/ $10 Post		$10 Initial/ $20 Post	
	n	%	n	%	n	%	n	%	n	%
Complete	4,752	46.0%	1,098	42.5%	1,272	49.3%*	1,120	43.3%	1,262	48.9%*
Refusal	843	8.2%	236	9.1%	193	7.5%	220	8.5%	194	7.5%
Non-locatable	2,616	25.3%	683	26.4%	646	25.1%	690	26.7%	597	23.1%
Final non-response	2,118	20.5%	568	22.0%	467	18.1%	557	21.5%	526	20.4%
	10,329	100%	2,585	100%	2,578	100%	2,587	100%	2,579	100%

*Response rate for the two $20 post groups combined significantly larger than for the two $10 post groups combined (p < .01)

The USDA-FNS Study to Assess the Effect of SNAP Participation of Food Security in the post-American Recovery and Reinvestment (ARRA) Environment (OMB Control Number 0584-0563, Discontinued September 19, 2011) offered a $2 pre-pay incentive and a $20 post-pay each upon completing the telephone interviews and had a response rate of 56 percent for baseline and 67 percent for a six-month follow-up[19] The estimated burden was about 30 minutes for each survey. Similar incentive amounts are being requested for this study. Furthermore, the FMCS study has demonstrated that the $20 incentive has a better outcome for response rates than the $10 incentive.

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[19][19] Mabli, James, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos. *Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security*. Prepared by Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, August 2013.

Cash Incentives are Preferred to Other Forms for Low-Income Respondents

While the use of cash incentives is currently not the preferred method by OMB for increasing response rates, FNS believes that for this study population of low-income households, cash incentives are the most appropriate way to ensure high survey response rates and to provide reliable and generalizable results. Cash is better than checks as a medium for incentives for low-income populations[20] because many low-income households are unbanked. For instance, over a quarter of households with incomes of $15,000 or less are unbanked.[21] If these households are to monetize their checks, they often must use check cashing services that often require customers to pay substantial service charges in order to cash a check.[22],[23] Cash incentives are also preferable to pre-paid gift cards as cash has shown to provide a higher response rate than prepaid vouchers[24] or gift cards.[25]

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[20][20] Groves et al., 2009.

[21][21] Federal Deposit Insurance Corporation (2014). *2013 FDIC National Survey of Unbanked and Underbanked Households*. Available at: https://www.economicinclusion.gov/surveys/2013household/documents/2013_FDIC_Unbanked_HH_Survey_Report.pdf.

[22],[22] Roger Swagler R, John Burton J and Joan Koonce Lewis J (1995). The Alternative Financial Sector: An Overview. *Advancing the Consumer Interest*. Vol. 7, No. 2 (Fall 1995), pp. 7-12.

[23][23] Fox J A, Woodall P (2006). Cashed Out: Consumers Pay Steep Premium to “Bank” at Check Cashing Outlets. Available at: http://consumerfed.org/pdfs/CFA_2006_Check_Cashing_Study111506.pdf.

[24][24] Van Veen F, Göritz A, Sattler S (2004). Response effects of prenotification, prepaid cash, prepaid vouchers, and postpaid vouchers: an experimental comparison. *Social Science Computer Review*. Available at: http://ssc.sagepub.com/content/early/2015/05/05/0894439315585074.abstract.

[25][25] Birnholtz J P, Horn D B, Finholt T A, Bae S J (2006). The effects of cash, electronic, and paper gift certificates as respondent incentives for a web-based survey of technologically sophisticated respondents. *Social Science Computer Review*.

Higher Incentives Are Justified for Greater Burden on the Respondent

Activities that place a greater burden on respondents may require a higher incentive to avoid non-response bias from respondents who agree to an interview but then fail to show up for the appointment. As the qualitative interview sample is being selected based on particular analytic characteristics (food security, rural-urban location, geographical region, and phase of the benefit month), replacing respondents at the last minute when they fail to appear for an appointment may lead to a less representative sample. The burden for the qualitative interview in this study is much higher than that for the paper survey: the instrument takes longer to administer (90 minutes versus 25 minutes), it requires the respondent to be willing to allow an unknown interviewer into the home, and it requires that the respondent allow a guided description of their kitchen. Because the interviewing team will be present in a given geographical location for only 1 week, the incentive must be of sufficient value to maximize the likelihood that respondents will be home at the time of the interview appointment. A similar qualitative in-home interview of SNAP clients conducted by Mathematica that provided only a $30 incentive had an overall response rate of just 36%. Of the 251 respondents contacted, only 126 agreed to participate (50%) and of these appointments, 29% were no-shows for the interview.[18]

18 U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, "SNAP Food Security In-Depth Interview Study," by Kathryn Edin, Melody Boyd, James Mabli, Jim Ohls, Julie Worthington, Sara Greene, Nicholas Redel, Swetha Sridharan. Project Officer: Sarah Zapolsky, Alexandria, VA: March 2013, pp. 2-3.

The FNS National Food Study Pilot, on the other hand (OMB Control Number: 0536-0074; Expiration Date: 12/31/2019), was recently approved to offer a $50 incentive for a 30 minute in-home interview and a 45-minute training on how to fill out a food diary. A similarly high incentive of $60 was approved by OMB for SNAP clients participating in 60-minute focus groups on the FMCS.

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.

Study participants will be subject to assurances as provided by the Privacy Act of 1974 (5 USC §552a), which requires the safeguarding of individuals against invasion of privacy. The individuals participating in this study will be assured 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. In addition, all Westat project staff and subcontractors will sign a confidentiality and nondisclosure agreement

(Appendix S). We will ensure the privacy and security of electronic data during the data collection and processing period by following the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports.[19] Names and phone numbers will not be linked to participants' responses, survey respondents will have a unique ID number, and analysis will be conducted on data sets that include only respondent ID numbers. Interview data collected in the field will also be kept secure. Any notes taken on a laptop will be saved in password protected files on a secure laptop. Any physical notes will be kept in a locked location (including a car glove box or hotel room safe) when not on the interviewer. All data will be securely transmitted to Westat via mail, Fed-Ex, FTP site, or phone; and will be stored in locked file cabinets or password-protected computers, and accessible only to Westat project staff. Names and phone numbers will be destroyed within 12 months after the end of the collection and processing period. Westat's Institutional Review Board (IRB) serves as the organization's

19Published in the Federal Register on April 25, 1991 (56 FR 19078).

administrative body and all research involving interactions or interventions with human subjects is within its purview. The IRB approval letter from Westat is included in Appendix T.

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.

Few of the survey questions and in-depth interview discussion topics are considered sensitive. The in-depth interview does ask about health problems related to diet. Further, since physical and mental health affects individual’s ability to purchase and prepare meals for themselves and their family, the Food and Your Household survey includes mental health questions. While these questions come from widely used instruments that are well tested, reliable and valid, it is possible that some participants may consider these questions sensitive. However, participation in this study is voluntary and participants can choose not to answer these or any other questions, in part or in full without penalties or loss of benefits.

A.12 Estimates of Respondent Burden Including Annualized Hourly Cost

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**.

Table 12.A presents the number of respondents, frequency of response, and annual hour burden for State agencies and SNAP beneficiaries.

- o State agency data collection
- o Food and Your Household Survey:
- o In-depth interviews

The estimated annualized cost to respondents is based on the national minimum wage of $7.25 per hour.

Table A.12.1 Reporting estimates of hour burden and annualized costs to respondents

Respondent category	Type of respondents	Instruments	Appendices	Sample size	Number of respondents	Frequency of response	Total annual responses	Average hours per Response	Annual burden	Number of non - respondents	Frequency of	Total annual responses	Average hours per response	Annual burden	Grand Total Annual Burden Estimate (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
State agency	State agency	State Agency Administrative Case Record Data (v)	V	26	26	1	26	1	26	0	0	0	0	0	26	7.25	188.50
Individuals/Household	SNAP participants	Survey Invitation letter (a)	A	6,593	5,934	1	5,934	0.05	296.69	659	1	659	0.0167	11.01	307.70	7.25	2,230.79
		Mail Survey (b)	B	6,593	4,020	1	4,020	0.417	1675	2,573	1	2573	0.0167	42.97	1718.00	7.25	12,455.49
		Survey automated reminder (c)	C	6,593	5,274	1	5,274	0.025	131.86	1,319	1	1319	0.0167	22.03	153.89	7.25	1,115.68
		Survey followup letter (d)	D	4,698	4,604	1	4,604	0.067	307.52	94	1	94	0.0167	1.57	309.09	7.25	2,240.90
		Survey automated reminder 2 (e)	E	4,698	3,758	1	3,758	0.025	93.95	940	1	940	0.0167	15.70	109.65	7.25	794.95
		Survey telephone interview (f)	F	2,573	796	1	796	0.5	398.08	1,777	1	1777	0.0167	29.68	427.76	7.25	3,101.23
		Telephone refusal conversion (g)	G	2,573	159	1	159	0.083	13.26	2,414	1	2414	0.0167	40.31	53.57	7.25	388.41
		Survey answering machine message (h)	H	2,573	2,059	2	4,117	0.017	68.76	514	1	514	0.0167	8.58	77.34	7.25	560.74
		Survey thank you letter with incentive (i)	I	4,816	4,816	1	4,816	0.017	80.43	0	0	0	0.0167	0.00	80.43	7.25	583.12
		In-depth interview screener (k)	K	240	216	1	216	0.083	17.99	24	1	24	0.0333	0.80	18.79	7.25	136.22

		In-depth interview appointment confirmation email (l)	L	120	120	1	120	0.017	2	0	0	0	0	0.00	2.00	7.25	14.50
		In-depth interview email/phone reminder (m)	M	120	120	2	240	0.017	4.01	0	0	0	0	0.00	4.01	7.25	29.07
		In-depth interview day before reminder call (n)	N	120	120	1	120	0.017	2	0	0	0	0	0.00	2.00	7.25	14.50
		In-depth interview replacement call for no-shows (o)	O	30	30	1	30	0.05	1.5	0	0	0	0	0.00	1.50	7.25	10.88
		In-depth interview with consent (p)	P	150	120	1	120	1.25	150	30	1	30	0.0167	0.50	150.50	7.25	1,091.13
Individuals/Households Subtotal				**6,593**	**5,934**	**--**	**34,324**	**--**	**3,243.08**	**659**	**--**	**10,344**	**--**	**173.14**	**3,416.22**	**--**	**24,767.62**
GRAND TOTAL				**6,619**	**5,960**	**--**	**34,350**	**--**	**3,269.08**	**659**	**--**	**10,344**	**--**	**173.14**	**3,442.22**	**--**	**24,956.12**

A.13 Estimates of Other Total Annualized Cost Burden

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.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

A.14 Annualized Cost to the 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 annual cost to the Federal Government is approximately $710,720. The contractor costs associated with this study total is $2,012,638. Using the Federal Wage Salary 2016, the Federal project officer, a GS-13-Step 10, will spend approximately 2,500 hours over 32 months to monitor the study and manage the data collection and reporting, costing the Federal Government $119, 524.03.

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; estimated to add 3,442.22 burden hours and 34,350 total annual responses to the OMB collection 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.

Time Schedule

The schedule for the study showing sample selection, beginning and ending dates of collection of information, completion of reports, and publication dates is shown on Table A16.1.

Table A.16.1. Data Collection and Reporting Schedule

Activity	Schedule
Obtain survey sample frame from States	1 Week after OMB approval – 10 weeks after OMB approval
Select survey sample	1/1/18 – 2/1/18
Survey data collection	5/14/18 – 8/13/18
Recruit in-depth interview respondents	6/25/18 – 7/14/18
Conduct in-depth interviews	7/14/18 – 9/24/18
1st draft survey report	4/22/19
Restricted use data and analysis files	4/22/19
1st draft in-depth interview report	3/4/19
2nd draft survey report	5/28/19
2nd draft in-depth interview report	4/1/19
FNS briefing	7/1/19
3rd draft survey report	7/1/19
Final in-depth interview report	5/6/19
Public use data files and codebook	7/29/19
Final survey report	7/29/19

Table A16.2 presents an overview of the objectives, data collection activities, and study reports regarding the assessment of the barriers to healthy eating for SNAP participants. Findings may be published in peer reviewed reports, professional journals, and publications intended for general audiences such as nutrition educators. Final reports will also be posted on the FNS web site.

Table A.16.2. Objectives, Principal Data Sources, and Reports

Objectives	Data source	Reports
Determine individual and household barriers	Food and Your Household Survey	Final survey report
Determine environmental barriers		
Describe the interaction between barriers		
Determine if and how to account for barriers in determining SNAP allotments		
Detailed description of most common barriers, how they vary by household characteristics and what strategies are used by households to overcome them.	In-depth interviews	Final in-depth interview report

A.17 Reason 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.

All data collection instruments will display the OMB approval number and expiration date.

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 for Paperwork Reduction Act (5 CFR 1320.9) for this study.