

**Supporting Statement for the Evaluation of Alternatives to Improve
Elderly Access to SNAP, Part A
Revised Submission**

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PART A. JUSTIFICATION

A1. Circumstances that make data collection necessary

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

This study comprises a new data collection request. This OMB Package is for planned data collection activities during 2018. It will provide FNS with a better understanding of the barriers to serving elderly populations (age 60 or older) in SNAP and the extent to which available policy options improve program access, whether certain program models or combinations are more effective than others, and what tradeoffs exist between program simplification/access goals and ensuring benefit adequacy. The study will draw on existing data, including SNAP Quality Control (QC) data [OMB Control no. 0584-0299, expiration 7/31/19]; a literature review; discussions with FNS Regional and National office staff and elder policy experts; site visits to State and local SNAP programs; interviews and focus groups with elderly SNAP participants and eligible non-participants; and analysis of SNAP administrative data.

The Food and Nutrition Act of 2008, as amended through P.L. 113–128, enacted July 22, 2014 [7 U.S.C. 2026], provides the legislative authority for the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to administer the Supplemental Nutrition Assistance Program (SNAP). Section 17 of the Food and Nutrition Act of 2008 provides authority to FNS to conduct research to help improve the administration and effectiveness of SNAP. The appropriate sections of each statute are included in **Attachment A.**

Previous research suggests that among all SNAP households, SNAP not only increases food access and reduces food insecurity (Gundersen & Ziliak, 2008), but it also

has significant positive effects on household incomes since such incomes rise by the benefit amount (LeBlanc, Lin, & Smallwood, 2006). SNAP thus raises millions of SNAP recipients out of poverty—over 10 million individuals in 2012, according to the Center on Budget and Policy Priorities (2016).

Elder individuals (age 60 or older) have historically participated in SNAP at substantially lower rates than the general population. Between 2010 and 2013, the participation rate among elders ranged from 46 to 50 percent of the rate for all eligible individuals (Eslami, 2015). Low participation rates among low-income elders are cause for public concern. Elder individuals without SNAP benefits may have diminished resources to purchase food; elder diet insufficiency has been connected to poorer mental and physical health outcomes as well as increased strain on caregivers—for example because elders with poor diets have increased hospitalization rates and thus require more care (Fuller-Thompson & Redmond, 2008). References can be found in **Attachment B**.

A variety of factors are responsible for the low SNAP participation rates among eligible elderly individuals. They involve attitudes toward public assistance, lack of knowledge about SNAP, and difficulties in obtaining SNAP benefits, both real and perceived. FNS has attempted to address barriers to access by instituting a range of policies and projects (which are collectively referred to hereafter as *interventions*). These include a series of demonstration projects, waivers, and policy options that States may implement. Because demonstrations and waivers forgo requirements of the Food and Nutrition Act or existing SNAP regulations, they require approval from FNS and additional State reporting responsibilities. FNS has undertaken the *Evaluation of Alternatives to Improve Elderly Access* to focus specifically on those interventions of special interest for improving elder SNAP access, listed in Exhibit A-1. In various ways and degrees, these interventions may increase elder SNAP applications and enrollment, increase benefit amounts, and help elder

individuals stay enrolled in SNAP.

Exhibit A-1: Interventions to Increase Elder SNAP Access

Elderly Simplified Application Project (ESAP) Streamlined SNAP application form, data matching to verify application information, 36-month SNAP certification period, waiver of the SNAP recertification interview
Combined Application Project (CAP) Partnership with Social Security Administration; “standard CAP” involves joint application for SSI and SNAP, “modified CAP” involves targeting SSI applicants for SNAP
Standard Medical Deduction (SMD) Standard medical deduction available for SNAP eligibility determination and benefit calculation for households with elder members with documented medical expenses over \$35/month
Elderly and Disabled Recertification Interview Waiver Waiver of SNAP recertification interview
36-Month Certification Demonstration Extended (36-month) SNAP certification period
Community Partner Interview Demonstration Approval for local community-based organizations (CBOs) to help with SNAP application process and conduct certification interviews

Sources: SNAP Policy Database, SNAP State Options Report [OMB No. 0584-0496, Exp. 7/31/18], SNAP Current and Historical Waiver Databases [OMB No. 0584-0083, Exp. 7/31/20], and communication with FNS.

While FNS has sponsored studies of several specific demonstration projects, no comprehensive assessment exists of the relative effects of interventions aimed at increasing access among elder individuals. Moreover, these demonstrations often involve multiple program components and evaluations are typically unable to examine the effects of specific interventions in isolation or the added value of concurrent interventions and their interaction effects. Little is known about the effects of interventions on caseload churn, their success in reaching those who are eligible but have never participated, or their potential trade-offs or unintended consequences (for instance, benefit reductions in interventions such as CAPs or SMDs, which are required to be cost-neutral). Filling these

gaps in knowledge will be critical to FNS policymaking and decisions about future initiatives.

A2. Purposes and uses 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.

Purpose of the collection

The information collected will be used to address five objectives and their associated research questions:

1. Present a coherent narrative about elder SNAP participation, historically and in the recent past.
2. Understand barriers to elder participation in SNAP.
3. Review the interventions designed to improve elder access to SNAP.
4. Measure the impact of each intervention on elders' participation in SNAP.
5. Determine which of the interventions studied have the most promising impacts related to increasing the participation of older adults in SNAP.

See **Attachment B: Study Design and References** for the associated research questions and more detail on the study design.

The study is divided into four sections: 1) the Exploratory Study, completed March 14, 2017 (**Attachment C: Exploratory Memo**), 2) the Study of State Interventions, 3) the Study of Elderly Participant Perspectives, and 4) the Study of Intervention Effects. The Study of State Interventions will commence within 1 week of OMB approval, with state recruitment activities (**Attachment I.2, I.3, I.4**). The purpose of this data collection is to conduct interviews and collect administrative data from States specific to elder (60+ years)

access to SNAP to determine which of the interventions studied have the most promising impacts related to increasing the participation of older adults in SNAP.

The Study of Elderly Participant Perspectives will begin after States' participation in the study has been confirmed, approximately one month after OMB approval. The purpose of this data collection is to gather direct input from elder (60+) individuals in English and in Spanish about their awareness of SNAP, perceptions of the program and the interventions, and experiences applying for and receiving SNAP benefits.

The Study of Intervention Effects will begin immediately after States have completed the MOU to authorize data collection (**Attachment I.1**), approximately one month after OMB approval. The purpose of this data collection is to measure the impact of each intervention on elders' participation in SNAP and determine which of the interventions studied have the most promising impacts related to increasing the participation of older adults in SNAP. The study team will collect the administrative data from State SNAP agency staff.

How the information will be collected.

The States proposed for inclusion in the study were selected, using a non-statistical approach to meet several major criteria. First, the States have adopted at least one of the interventions identified as being of special interest for improving elder SNAP access (as identified in Exhibit A-1). Second, the study States were selected to vary in terms of SNAP elder participation rates to ensure that the outcome to be explained (elder SNAP enrollment) has a high degree of internal variation that supports meaningful research conclusions. Third, study States were selected to vary in how the program is administered (either at the State level or the county level). Fourth,

States were selected to represent all FNS geographic regions. (See *State Selection Memo, Attachment K*).

One week after OMB approval, the study team will contact ten States that match the criteria set above to recruit them to participate in the study: Alabama, Arkansas, Florida, Idaho, Massachusetts, Minnesota, Nebraska, New York, Pennsylvania, and Washington (**Attachment I.4 – I.7**). Six alternate States will be considered for inclusion in the case that any of the primary States decline to participate in the study. If a State opts out, it will be replaced with an alternative State that matches its key selection criteria. Once States agree to participate, they will complete a Memorandum of Understanding (MOU) for data collection (**Attachment I.1**), approximately one to two months after OMB approval.

For the Study of State Interventions, the study team will contact States to schedule a site visit immediately after the MOU is completed. A three-day site visit to the State will be conducted two to six months after OMB approval. The study team will collect information using the *State and Local SNAP and Partner Agency Administrator Interview Protocol* (**Attachment G.1**), about the purpose of the intervention(s), the key elements of the intervention(s) and how they were implemented, perceived outcomes of the intervention(s), local contextual information, and lessons learned. State and local SNAP and partner agency administrators also will participate in the interviews (**Attachment G.2**).

Using the *Community-Based Organization Interview Protocol* (**Attachment G.3**), the study team will collect information about efforts to increase access to SNAP or other food sources for the elderly in the State or local community and lessons learned. Representatives from community-based organizations that may refer elderly

individuals to SNAP or provide them with supplemental or alternative support such as meals or food baskets will participate in the interviews. These organizations will be identified by State and local SNAP agencies and recruited using materials in **Attachment D.1**. Respondent CBOs will participate in a one-hour interview during the study team's three-day site visit to the State.

For the Study of Elderly Participant Perspectives, data will be collected through interviews with 200 elderly individuals (**Attachment H.1 and H.1a**), with approximately 20 interviews in each of the ten States participating in the study. Site visits to States to conduct interviews will take place two to six months after OMB approval. Interviews will be conducted in interviewees' homes, or at a senior center, library, or other convenient location for the interviewee. Three groups of individuals 60 years of age or older will be included in the interviews—elder SNAP participants, non-participating applicants, and non-participants (see **Attachment B: Research Study Design** for more details). The study team conducted six test interviews on March 8–10, 2017, at a Senior Wellness Center in Washington, DC and submitted a memo with the pretesting results (**Attachment J**).

Approximately one month after OMB approval, the study team will recruit English and Spanish speaking individuals to interview by phone (**Attachment D.3 and D.3a**) through a random sample of participants and non-participating applicants using current State administrative data, and of non-participants through a random sample of third-party panel data. Participants contacted through any method will be told that their participation is voluntary. When State administrative data is available (i.e. for participants and non-participating applicants), the study team will use the phone number included in the data to call randomly selected individuals who are likely to be eligible due to their age, income,

and SNAP participation status approximately two weeks before the interviews in their area are to occur. During this phone call, the study team member will inform the individual about the opportunity to participate in an interview and that it is voluntary. With participant consent, a brief online screening (**Attachment D5 and D5a**) will be conducted, for example BenefitsCheckUp, to confirm SNAP eligibility. Individuals who are found to be eligible will be scheduled for an interview. The study team will call each selected phone number up to three times, leaving messages if there is no response.

The study team will track interviews as they are scheduled to ensure there is a mix of respondent characteristics such as gender, age, sexual orientation, race and ethnicity, and veteran status. To schedule interviews for individuals who are non-participants and to reach additional participants and non-participating applicants if not enough of such interviews have been scheduled within a week of the proposed interview visits, the study team will also recruit for interviews through local CBOs. In each local area, the study team will work with two local CBOs, giving them flyers (**Attachment D.2 and D.2.a**) about the study so that they can recruit appropriate individuals. The study team will conduct brief screenings of such individuals just prior to their interview to confirm eligibility, though CBO partners will be informed of study eligibility so that they recruit individuals likely to meet eligibility criteria (**Attachment D.3, D.3a**).

In addition, data will be collected through 8–10 focus groups of approximately eight elderly participants each, drawn from the three groups defined above. Individuals for focus groups will be recruited from among those served by the CBO partners described above. CBOs will be provided with a flyer (**Attachment D.4**) to recruit individuals for focus group participation, and these individuals will fill out a brief screening form (**Attachment D.5**) to confirm eligibility just prior to the focus group. Note that the individuals who participate in the focus groups will be different individuals from those who participate in the interviews.

Approximately one focus group will be held in each of the ten participating States, and will be held in English only. All participants contacted about the focus groups will be told that their participation is voluntary and they can refuse to participate or respond to questions in part or in whole without any penalties or loss of benefits (**Attachment D.7**).

For the Study of Intervention Effects, State SNAP administrative case records will be used to document how interventions alone and in combination are associated with changes in elder SNAP application trends, caseloads, rates of churning, and, for some interventions, use of medical deductions in the SNAP eligibility and benefit determination calculation

Frequency of information collected.

FNS will conduct each data collection only once for each component of the study as described above.

Information shared with any other organizations inside or outside USDA or the government.

FNS plans to post the final report with detailed findings on the FNS intranet. FNS may share data files, which will not include any information that would compromise participant privacy, with other entities as requested.

A3. Use of 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 seeks to comply with the E-Government Act of 2002, which promotes the use of technology to reduce respondent burden.

Data collection for the Study of Elderly Participant Perspectives and the Study of State Interventions will not employ information technology. Instead, data will be collected in person, by trained and experienced researchers conducting focus groups and interviews using semi-structured protocols.

A4. Efforts to identify duplication and use of similar information

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There is no similar ongoing data collection being conducted that duplicates the efforts of the proposed data collection for the study. Every effort will be made to avoid duplication of data collection efforts within the Study of State Interventions. There have been a few studies that included surveys or interviews with elder SNAP participants or likely eligible elder non-participants. (Burstein, 2004; Bartlett et al., 2004; Cody & Ohls, 2005; Gabor et al., 2002; Kauff et al., 2012; McConnell & Ponza, 1999; Oemichen & Smith, 2016; Sama-Miller et al., 2014). However, none of these studies meet our needs.

A5. Impacts on Small Businesses or Other Small Entities

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

There are some small entities involved in this data collection. Small Community Based-Organizations (CBOs) are an integral provider of services in some States. As such, the Study of State Interventions must include these organizations. The study protocols (**Attachment I**) have been designed to impose minimal burden on the 30 organizations who will participate. The information being requested during interviews has been held to a

minimum required for the intended use. Each interview will be scheduled at a time that is convenient to the respondent and last an average of one hour.

Additionally, 40 CBO's serving elderly individuals will assist the FNS study team in recruiting focus group participants and allow their facilities to serve as a neutral site location in which to hold the focus groups. All 90 CBO's, including the respondents and non-respondents, are considered small entities.

A6. 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 voluntary data collection activity. Elderly individuals have historically participated in SNAP at substantially lower rates than the general population. Low participation rates among low-income elderly individuals are cause for public concern. Without SNAP, elderly individuals may be unable to meet their nutritional needs, forgo medicine for food, or be unable to pay utility bills or secure safe or stable housing. As stated in Section 17 [7 U.S.C. 2026] FNS may “undertake research that will help improve the administration and effectiveness of the supplemental nutrition assistance program in delivering nutrition-related benefits”. This study enables FNS to fulfill SNAP's mission as described in the Food and Nutrition Act “to safeguard the health and well-being of the Nation's population by raising levels of nutrition among low-income households”.

A7.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 3 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 that unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secrets 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 that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.

A8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

On Tuesday, May 30, 2017, a 60-Day Federal Register Notice was published at 73 FR 12746 Volume 82, No. 102. FNS received 4 comments. See **Attachment E1-E5a** for the Public Comments and FNS' Responses.

The following individuals were consulted outside the agency.

1. Irene Fan, NASS Statistician

Summary, Estimation, and Disclosure Methodology Branch

National Agricultural Statistics Service, USDA, (202) 690-0106

2. Lura Barber Director, Hunger Initiatives

National Council on Aging, 571.527.3930

3. Pat Baker, Senior Policy Analyst

Massachusetts Law Reform Institute, 617-357-0700 ext. 328

4. Will Thomas, Hunger Program Analyst

AARP Foundation, 800-775-6776

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

State agency and county administrators and staff members will not be offered remuneration for completing study tasks.

Elder participant respondents in interviews and focus groups will be offered a \$20 Visa gift card as an incentive. This incentive is essential for maximizing the response rate and decreasing non-response bias. Although several factors are typically involved in obtaining adequate response rates in research studies that involve low-income elders and other hard-to-reach respondent groups, the effect of incentives in increasing participation rates for these groups has been widely documented. This is a significant consideration for this study because the targeted elder participants will be low-income.

The study team also plans to provide each community-based organization (Business- not-for-profit) participating in data collection efforts for the Study of Elderly Participant Perspectives with an honorarium of \$300. These organizations will assist the study team in

recruiting elder individuals for the focus groups and their facilities may also serve as neutral locations in which to hold the focus groups. These organizations will also serve as backup recruitment sources for the elder interviews. The honoraria will offset these burdens, encourage participation in the study, and acknowledge organizations' efforts in a respectful way.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

FNS complies with the Privacy Act of 1974. FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19078–19080, that discusses the terms of protections that will be provided to respondents for States, Local or Tribal agencies, FNS-9 USDA/FNS Supplemental Nutrition Assistance Program Retailer (STARS) published December 27, 2010, volume 75, page 81207-81209 for Individuals/Households and FNS-10 USDA/FNS Persons Doing Business with Food and Nutrition Service published March 31, 2000, volume 65, page 17251-17252 for Business-not-for-profit.

The information provided during the staff interviews is protected in accordance with 42 U.S.C. 1306, 20 CFR 401 and 422, 5 U.S.C. 552 (Freedom of Information Act) 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130.

The study team takes seriously the ethical and legal obligations associated with the collection of private data. Ensuring the secure handling of private data is accomplished via several mechanisms: obtaining suitability determinations for designated staff, training staff to recognize and handle sensitive data, using secure data transfer protocols, protecting computer systems from access by staff without favorable suitability determinations, limiting the use of

personally identifiable information in data, limiting access to secure data on a “need to know” basis, and creating data extract files from which identifying information has been removed. The assurances and limits of privacy will be made clear “information is kept private and will not be disclosed outside the research team, except as otherwise required by law” in all advance materials sent to recruit States and to respondents verbally at the start of each interview.

All data from all study components will be housed in a secure project folder, to which only the study team has access. Recorded interviews will contain only the interview number, not the name of the interviewee, and will be downloaded into an encrypted drive as soon as the research staff returns to the office. Recordings will be checked and any personal identifying information will be erased before transcription.

Protecting the privacy of sensitive data is a priority of the study team. Subcontractors SPR and Mathematica have adopted federal standards for the use, protection, processing, and storage of data. Their security policies, procedures, and safeguards are consistent with the Privacy Act, the Federal Information Security Management Act, OMB memoranda on data security and privacy, and National Institute of Standards and Technology security standards. Their approach to implementing security controls includes assigning dedicated security and privacy experts to each project and leveraging company-wide secure computing infrastructure and data handling practices. Both organizations secure sensitive information and strictly control access to it on a need-to-know and least-privilege basis.

The study team recognizes the importance of centralizing data transfers and securely controlling access to administrative data. To meet these needs, Mathematica developed and is hosting an FX site that will be used by States to transmit data and associated documentation to Mathematica and by Mathematica to transmit data to SPR. Each State will have its own

folder structure on the FX site. Written in ASP.NET, the FX site has gone through a code review and testing for post-production security, penetration, and access control. Additional security testing, including access control review, is conducted periodically. The site employs Federal Information Processing Standard (FIPS) 140-2 compliant encryption in transit and at rest. Data that are transferred to the FX site using a web browser are encrypted using the 256-bit AES algorithm, using TLS. Files are stored temporarily and securely erased when being removed from the server.

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.

There is information that can be considered sensitive in nature. Nonetheless, respondents will be informed that they do not have to respond to any questions that they do not feel comfortable answering in part or in full.

The Study of Elderly Participant Perspectives will collect data on the race or ethnicity of respondents, following OMB Standards for the Classification of Federal Data on Race and Ethnicity for asking questions about race or ethnicity (**Attachment D.3 and D3a**). This data collection is necessary for reporting the characteristics of the sample interviewed in each state.

The study team will also collect data on the sexual orientation of respondents using methods recommended by a national organization focused on lesbian, gay, bisexual, and

transgender (LGBT) individuals and aging (National Resource Center on LBGT Aging, 2016). All respondents will have the opportunity to decline to answer the question about sexual orientation. This data collection is important because the identities of LGBT older adults are rarely included in population-level research studies, service intake forms, or client notes. This lack of data collection across the spectrum of aging policy and programs can exacerbate the special challenges facing LGBT older adults. Given the lack of available data, this small study can provide valuable data that enriches our knowledge about the variety of experiences of low-income LGBT elder participants, even though our sample of respondents will not be representative of the elder population as a whole (Choi & Meyer, 2016). By learning more about the access issues and barriers facing LGBT elders, FNS will be able to improve efforts to provide services to this sub-population of elders, who experience higher poverty rates and disproportionately lower retirement benefits due to lower rates of marriage (Services & Advocacy for LGBT Elders).

All elderly participants will sign a consent form (**Attachment D6 and D6a**) prior to participating in an interview or focus group that clearly identifies the optional nature of their participation, the privacy and safeguard of the data, and who they can contact if they have questions or concerns about the study.

A12. 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.

This is a new data collection with an estimated burden of 1,380.2 hours distributed among the sample size of 1,024 total respondents (666 who are considered responsive and 358 who are considered non-responsive) engaging in 1,314 total “responses” (876 from respondents and 438 from non-respondents). These estimates and the parameters used to calculate them are shown in **Table A.12.1** and **Attachment F: Sample Sizes, Estimated Burden, and Estimated Cost of Respondent Burden.**

Table A.12.1 breaks down the burden into sections for “individuals and households,” “business not-for-profit,” and “State, local & tribal SNAP and partner agency staff.” Within each group, the burden estimate includes time taken by non-participants who consider participation and decline as well as by those who ultimately participate in the study. Below we describe the parameters (sample sizes, etc.) that are the basis for calculating the burden for each of the three groups in more detail.

Calculating interview burden on individuals and households: The goal is to conduct 200 in-person interviews lasting one hour each. To do this, FNS estimates that it will need to screen 560 elder individuals over the phone for eligibility and interest. Of these 560 individuals, FNS estimates that 280 will decline to participate or be found ineligible (280 non-respondents) and 280 will then participate in the interview scheduling and interview activity (280 respondents). From this group of 280 respondents, FNS estimates that 200 individuals will actually participate in an interview. These 200 individuals are already counted in the estimated number of respondents through their participation in the interview screening activity, so they are not double counted for their participation in the interview activity. FNS estimates that the remaining 80 individuals fail to attend an interview and will be considered non-

respondents for the interview scheduling and interview activity. Though these individuals are non-respondents for the interview task, they are counted in the original 560 individuals who are screened for possible interviews.

In sum, this means that the interview sample size is 560 (the number of elder individuals who participate in the interview phone screening, since all individuals who ultimately participate in an interview will have previously participated in this activity); the number of respondents is 280 (the number of elder individuals who have an interview phone screening, since all individuals who ultimately participate in an interview will have already participated in this activity); and the number of non-respondents is 360 (the 280 elder individuals who do not participate in or are found ineligible during the phone screening and the 80 elder individuals who fail to attend their scheduled interviews).

The total interview burden on individuals and households also includes 6 interviews with elder individuals conducted for testing the interview protocol that took place in March 2017. This was a convenience sample of 6 individuals at a senior center and the interviews averaged 45 minutes each.

Calculating focus group burden on individuals and households: The goal is to conduct 90-minute in-person focus groups with 80 individuals. To do this, FNS estimates that 115 elder individuals will need to be recruited and 80 elder individuals will end up participating. In sum, this means that the focus group sample size is 115 (the number of elder individuals recruited), the number of respondents is 80 (the number of elder individuals who participate in a focus group), and the number of non-respondents is 35 (the number of elder individuals who are recruited but do not participate in a focus

group). The individuals participating in the focus group will be a sample of convenience and are not the same individuals who are being screened for or are participating in interviews.

Calculating overall burden for individuals and households: Combining the burden for the interviews and focus groups gives the following burden numbers for individuals aged 60 years of more: a sample size of 681 (6 individuals who participated in test interviews, 560 individuals who participate in an interview phone screening, 280 of those same individuals who participate in the interview scheduling and interview activity, and 115 different individuals who are recruited for focus groups), an estimated number of respondents of 366 (6 individuals who participated in test interviews, 280 individuals who participate in an interview phone screening, 200 of those same individuals who participate in an interview, and 80 different individuals who participate in a focus group), and an estimated non-respondent number of 395 (280 individuals who decline to participate or are found ineligible in the interview phone screening, 80 individuals who fail to attend their scheduled interviews, and 35 individuals who fail to attend their planned focus group). Note that FNS avoids double counting by only counting individuals once who participate in two activities.

The hour burdens for individuals and households are estimated from the study team's prior experience conducting focus groups; from testing BenefitsCheckUp, an online benefits screening tool; and from piloting the interview instrument with six elder individuals in March 2017. Based on this prior knowledge and the interview pilots, FNS estimates that the average amount of time for the phone screening will be .3 hours for respondents, the average amount of time for the interview scheduling and interviews

will be one hour for respondents, and the average amount of time for focus group participation will be 1.5 hours for respondents. Non-respondents are expected to spend an average of .1 hours on each of these activities because FNS assumes that most will quickly decline to participate in a screening or will not show up to scheduled interviews or focus groups.

Calculating burden for business not-for-profit: Two groups of organizations will be contacted for the research. FNS estimates that 40 non-profit organizations serving elder individuals will spend five hours each recruiting focus group participants and hosting focus groups, out of a total of 50 contacted to participate in the Elderly Participant Perspectives Study. They will also help recruit non-participants for the interviews. FNS estimates that 30 non-profit community based organizations will participate in one hour-long interview out of a total of 40 contacted for the Study of State Interventions. In sum, this means that there is an estimated sample size of 90 (50 organizations serving elder individuals and 40 community based organizations will be contacted), a respondent number of 70 (40 organizations serving elder individuals and 30 community based organizations will participate), and a non-respondent number of 20 (ten organizations serving elder individuals and ten community based organizations will decline to participate). FNS estimates that non-respondents will spend an average of .2 hours on these tasks because they will have a short phone call with a study team member during which they will decide their organization's participation is not possible.

Calculating burden for State, local, & Tribal SNAP and partner agency staff: Six categories of government staff members will participate in the study (State SNAP directors, State SNAP staff members who work with administrative data, other State

SNAP staff members, local SNAP office directors, State and local partner agency staff members, and local SNAP staff members). FNS considers the State SNAP directors to be gatekeepers for SNAP staff member study participation in any given State. FNS estimates that once a State SNAP director approves his or her State's participation in the study, all other State and local SNAP staff members will agree to participate. Therefore, their participation may be mandatory. In contrast, FNS assumes that some partner staff members will decline to participate since they will not have a participation directive from above. In these burden calculations, FNS accounts for the time of State SNAP directors and partner agency staff members who decline to participate.

FNS estimates that out of 13 State SNAP directors recruited for the study, 10 State SNAP directors will participate. The estimated number of responses per State government SNAP director is two. Ten State SNAP directors will spend 10 hours each completing a Memorandum of Understanding with the research team, and the same individuals will take part in an interview lasting approximately one hour. To avoid double counting, State SNAP directors are only counted once in sample size and respondent calculations.

As explained above, once a State SNAP director has committed to participate in the research, FNS estimates that all the contacted respondents in that State—State SNAP administrative staff members, local SNAP Office Directors, and local SNAP staff members—will participate once. Of the 70 State SNAP administrative staff members participating across all States in the study, FNS estimates that 20 will spend 20 hours providing administrative data for the Study of Intervention Effects and the Study of Elderly Participant Perspectives, and 50 will spend one hour participating in interviews

for the Study of State Interventions. Out of the 50 State and local government partner agency staff members contacted across all the participating states, FNS estimates that 30 will participate in an hour-long interview for the Study of State Interventions.

In sum, this means that there is:

- an estimated sample size of 253 (13 State SNAP directors, 70 State SNAP staff members, 20 local SNAP office directors, 50 State and local partner agency staff members, and 100 local SNAP staff members);
- an estimated respondent number of 230 (10 State SNAP staff members, 70 State SNAP staff members, 20 local SNAP office directors, 30 State and local partner agency staff members, and 100 local SNAP staff members); and
- an estimated non-respondent number of 23 (3 State SNAP staff members and 20 State and local partner agency staff members).

To estimate the burden for nonrespondent State SNAP directors, we included time to review the MOU and talk with the research team and others in the State about participation. For other nonrespondents, we included time to respond to the study team's initial inquiry about participation.

Table A.12.1 Estimated Burden

				RESPONDENTS					NON-RESPONDENTS					COSTS			
Respondent Description	Study Component	Instrument or Activity	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 Burden Estimate (Hours)	Hourly Wage Rate*	Estimated Total Annual Cost to Respondents	
INDIVIDUALS & HOUSEHOLDS																	
Elderly Individuals 60+	Elderly	Participant Perspective	Interest Interviews	6.0	6.0	1.0	6.0	0.8	4.8	0.0	0.0	0.0	0.0	4.8	\$ 7.25	\$ 34.80	
	Elderly	Participant Perspective	Interview phone screenings	560.0	280.0	1.0	280.0	0.3	70.0	280.0	1.0	280.0	0.1	22.4	92.4	\$ 7.25	\$669.90
	Elderly	Participant Perspective	Interview scheduling and interviews *	280.0	200.0	1.0	200.0	1.0	200.0	80.0	1.0	80.0	0.1	6.4	206.4	\$7.25	\$1,496.40
	Elderly	Participant Perspective	Focus group	115.0	80.0	1.0	80.0	1.5	120.0	35.0	1.0	35.0	0.1	2.8	122.8	\$7.25	\$890.30
total Individuals and Households			681.000	366.000	1.546	566.000	0.698	394.800	315.000	1.000	395.000	0.080	31.600	426.400		\$3,091.40	
BUSINESS NOT-FOR PROFIT																	
Organizations serving elderly individuals 60+	Elderly	Participant Perspective	Focus group and interview recruitment and scheduling	50.0	40.0	1.0	40.0	5.0	200.0	10.0	1.0	10.0	0.2	1.6	201.6	\$22.70	\$4,576.32
Community based organization	State	Interventions	Data collection site visits	40.0	30.0	1.0	30.0	1.0	30.0	10.0	1.0	10.0	0.2	1.6	31.6	\$22.70	\$717.32
total Business -not-for Profit			90.000	70.000	1.000	70.000	3.286	230.000	20.000	1.000	20.000	0.160	3.200	233.200		\$5,293.64	

				RESPONDENTS					NON-RESPONDENTS					COSTS		
STATE, LOCAL & TRIBAL SNAP AND PARTNER AGENCY STAFF																
State SNAP Director**	Intervention Effects & Elderly Participant Perspectives	Complete MOU	13.0	10.0	1.0	10.0	10.0	100.0	3.0	1.0	3.0	3.0	9.0	109.0	\$34.07	\$3,713.63
	Intervention Effects & State Interventions	Data collection site visits	10.0	10.0	1.0	10.0	1.0	10.0	0.0	0.0	0.0	0.0	0.0	10.0	\$34.07	\$340.70
State SNAP Staff	Intervention Effects & Elderly Participant Perspectives	Provide admin. data	20.0	20.0	1.0	20.0	20.0	400.0	0.0	0.0	0.0	0.0	0.0	400.0	\$20.94	\$8,376.00
State SNAP Staff	State Interventions	Data collection site visits	50.0	50.0	1.0	50.0	1.0	50.0	0.0	0.0	0.0	0.0	0.0	50.0	\$20.94	\$1,047.00
Local SNAP Office Directors	State Interventions	Data collection site visits	20.0	20.0	1.0	20.0	1.0	20.0	0.0	0.0	0.0	0.0	0.0	20.0	\$34.07	\$681.40
State & Local Partner Agency Staff	State Interventions	Data collection site visits	50.0	30.0	1.0	30.0	1.0	30.0	20.0	1.0	20.0	0.1	1.6	31.6	\$20.94	\$661.70
Local SNAP Staff	State Interventions	Data collection site visits	100.0	100.0	1.0	100.0	1.0	100.0	0.0	0.0	0.0	0.0	0.0	100.0	\$20.94	\$2,094.00
Subtotal State and Local SNAP and Partner Staff			253.000	230.000	1.043	240.000	2.958	710.000	23.000	1.000	23.000	0.461	10.600	720.600		\$16,914.43
GRAND TOTAL			1024.000	666.000	1.315	876.000	1.524	1334.800	358.000	1.000	438.000	0.104	45.400	1380.200	-	\$25,299.47

***Sample size and respondents for the "interview scheduling and interviews" activity:** The sample for this activity are all part of the group of 280 respondents who complete the "interview phone screening" activity above. Since these individuals are involved in two activities ("interview phone screening" and "interview scheduling and interviews"), they are only included in the sample calculation once, for the "interview phone screening" activity, since otherwise they would be double counted.

Similarly, the 200 respondents who participate in the "interview scheduling and interview" activity were included in the 280 who complete the "interview phone screening" activity. As such, they are only included in the estimated number of respondents column for the "interview phone screening" activity since otherwise they would be double counted.

**** Sample size and respondents for the State SNAP Directors:** State SNAP Directors are only counted in the sample size and respondent calculations once since the same individuals participate in both the "complete MOU" and "Data collection site visits" tasks.

Note for Cell J6: Dual respondents for interview phone screenings and interviews: Of 560 participants in the interview phone screening component, we estimate that 280 will respond. Of these 280, we estimate that 80 will not respond for the final interview component. Therefore, the 80 participants in this cell are respondents for the screenings and nonrespondents for the interviews.

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

Table A.12.1 shows the estimated annualized cost to the respondents (including those considered responsive and nonresponsive) for the hours of burden for this data collection. The total monetized burden estimate for data collection from the elder individuals who will participate in the Study of Participant Perspectives is \$3,091.40. The cost was calculated by multiplying the number of hours associated with participating in each activity by the federally-mandated minimum wage.¹

The total monetized burden estimate for data collection from staff members of CBOs and organizations serving elder individuals is \$5,293.64. That is the total estimated hours of burden for this data collection multiplied by the average hourly wage for counselors, social workers, and other community and social service specialists (\$22.70; Bureau of Labor Statistics, 2016).

The total monetized burden estimate for data collection from State and local agency staff members is \$16,914.43. This sum represents the total estimated burden for two categories of staff. To estimate the burden for State SNAP directors, we multiply the number of hours estimated for this category by the average hourly wage for social and community service managers (\$34.07; Bureau of Labor Statistics, 2016). To estimate the burden for State and local SNAP agency staff members and partner staff members, we multiply the number of hours estimated for this category by the average hourly wage for eligibility interviewers in government programs (\$20.94; Bureau of Labor Statistics, 2016).

The total monetized cost burden for the entire data collection is \$25,299.47.

A13. Estimate for the total annual cost burden to respondents

¹ <https://www.dol.gov/general/topic/wages/minimumwage>

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.

The study data collection activities do not place any capital costs or costs of maintaining requirements on the respondents.

A14. Estimate of annualized costs 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 \$633,580. The contract cost to the Federal Government is a fixed price award, valued at \$1,815,446.00. This total includes costs associated with the study design, instrument development, recruitment and selection of States, data collection, data analysis, reporting, and presentation/publication of the results. Of the total cost (\$1,815,446), approximately \$1,067,184.00 will be used for data collection and analysis. This includes \$142,653 for the development of data use agreements with States and \$142,653 for collection, cleaning and analysis of State administrative data; \$68,346 for site visits for the Study of State Interventions, and \$170,018 for processing and analyzing the data and reporting to FNS on its collection; and \$102,280 for interviews and focus groups with elderly participants, \$155,928 for transcriptions, data analysis and reporting to FNS on its collection. Travel costs will not exceed \$73,616.

This information collection also assumes the cost of FNS employees which is estimated to be \$85,293.00. This cost was calculated as follows:

The FNS employee, Social Science Analyst, involved in project oversight which is estimated at GS-12, step 5 at \$33.72 per hour based on 2,080 hours per year. We anticipate this person will work 520 hours per year for 3 years for a combined total of 1,560 hours. The total cost for the FNS Social Science Analyst is \$52,603.

- The FNS employee, Policy Analyst, involved in providing expert subject matter guidance to the project which is estimated at GS-13, step 4 at \$49.96 per hour based on 2,080 hours per year. We anticipate this person will work 60 hours per year for 3 years for a combined total of 180 hours. The total cost for the FNS Policy Analyst is \$8,993.
- The FNS employee, Branch Chief, involved in project oversight with the study is estimated at GS-14, Step 4 at \$59.29 per hour based on 2,080 hours per year. We anticipate this person will work 120 hours per year for 3 years for a combined total of 360 hours. The total cost for the FNS Branch Chief is \$21,344.
- The FNS employees, Regional Office SNAP Directors (7), involved in recruiting States for the study is estimated at GS – 13, Step 8 at \$56.02 per hour based on 2080 hours per year. We anticipate these persons will work 2 hours per year for 3 years for a combined total of 42 hours. The total cost for the Regional Office SNAP Directors is \$2,353.

Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2017 for the Washington, DC, locality.

The total cost (contract + FNS costs) is \$1,900,739, for an average annual cost of \$633,580.

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 request and will add 1,380 burden hours and 1,314 total annual responses to OMB's inventory.

A16. Plans and schedule for tabulation and publication

Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

Data analysis for the Study of State Interventions will be based on site visit summaries that researchers will draft after each visit is complete. The site visit summaries will provide qualitative information on how the interventions were implemented and the contexts in which they were implemented across States.

For the Study of Elderly Participant Perspectives, data analysis and tabulation will begin during the interviews, continue immediately after the focus groups, and conclude after all interviews and focus groups have been completed. Prior to conducting data analysis, we will send audio recordings of interviews and focus groups to a transcription firm, and each transcript then will be de-identified and assigned a unique research ID to ensure respondents' privacy. We will then analyze these transcripts, along with interviewers' field notes, using qualitative data analysis software (NVivo). The study team will classify and code the data and then explore the relationship between respondent characteristics and perceptions of and experiences with SNAP enrollment. The team will conduct this analysis by using the State- and county-level intervention classifications identified during stakeholder interviews to query and filter for experiences with a specific intervention and experiences with a combination of, or an absence of, specific interventions.

To answer the research questions for the Study of Intervention Effects, the study team will use several analytic techniques. Comparative interrupted time series (CITS) models will be used to estimate the effects of individual interventions within and across States; pooled multi-State models estimate the interaction effects of multiple interventions on applications, caseloads, and churning.

Time Schedule for the Entire Project

Weekly reports will be submitted about data collection progress between May and December 2018. Individual summary memos on each of the study components will be submitted in January 2019. Findings from all three study components will be synthesized and presented in the evaluation’s draft final report in March 2019. The Final Report will be organized by study objectives, and it will draw on findings from the study components separately and in combination to address the research questions. The report will be written for a broad, non-technical audience with more detailed technical appendices. Exhibit A.16 outlines the schedule for data collection and reporting.

Exhibit A.16: Study Schedule

Activity	Expected Activity Period
Study of State Interventions	
Recruit States and Obtain MOUs	1 week after OMB approval – 12 weeks after OMB approval
Train site visit researchers	1 months after OMB approval
Conduct site visits	2 months after OMB approval – September 2018
Draft Data Analysis Memo	January 2019
Study of Elderly Participant Perspectives	
Train site visit researchers	1 month after OMB approval
Recruit elderly individuals for interviews and focus groups	1 – 3 months after OMB approval

Activity	Expected Activity Period
Conduct interviews and focus groups	2 months after OMB approval – September 2018
Draft Data Analysis Memo	January 2019
Study of Intervention Effects	
Collect administrative data	1 month after OMB approval – November 2018
Analyze data	November 2018 – January 2019
Draft Data Analysis Memo	January 2019
Draft Final Report	March 2019
Revised Final Report	June 2019

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

FNS will display the expiration date of OMB approval and OMB approval number on all instruments associated with this information collection, including forms and questionnaires.

A18.

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

No exceptions are necessary for this information collection. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

