

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-[NEW]:

**Evaluation of Technology Modernization for SNAP Benefit Redemption through Online
Transactions for the USDA Food and Nutrition Service**

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A1. Circumstances that make the collection of information necessary.

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

This is a new collection. Section 4011 of the Agricultural Act of 2014¹ (The Farm Bill) mandated by Congress that the U.S. Department of Agriculture's Food and Nutrition Service (FNS) conduct an *Electronic Benefits Transfer Online Purchasing Pilot* (referred to in this document as the *SNAP Online Purchasing Pilot*) to test the feasibility and implications of allowing retail food stores to accept Supplemental Nutrition Assistance Program (SNAP) benefits through online transactions. The Farm Bill provided FNS and its stakeholders an opportunity to begin modernizing benefit redemption through online purchasing for SNAP.

SNAP offers nutrition assistance to low-income individuals and families and provides economic benefits to communities. Until the SNAP Online Purchasing Pilot was authorized, SNAP required in-person benefit redemption. On September 15, 2016, FNS issued a Request for Volunteers to recruit for the SNAP Online Purchasing Pilot.² Seven retailers selected by FNS are participating in the SNAP Online Purchasing Pilot.³ These retailers will route online SNAP purchases through a designated third-party processor, which has the only FNS-approved system for secure online entry of personal identification numbers (PINs) for EBT transactions. Along with the retailers (and their web service providers, if any), the third-party processor and two EBT host processors will be important participants and stakeholders in the pilots.

For customers, online shopping may increase access to healthy and affordable foods and save

¹ The Food and Nutrition Act of 2008 as amended through the Agricultural Improvement Act of 2018 (2018), P.L. 115-334, 7 U.S.C. 2016. See Appendix A.

² This Request for Volunteers was approved by OMB. The OMB control number is 0584-0606 and has an expiration date of 3/30/2019. The renewal for this OMB control number is currently at OMB under review.

³ FNS originally selected nine retailers in 2017. However, one declined to participate and one subsequently withdrew.

time. For participating retailers, online shopping provides the opportunity to serve SNAP customers beyond in-store purchases and increase their customer base.

Through the *Evaluation of Technology Modernization for SNAP Benefit Redemption through Online Transactions (SNAP Online Purchasing Evaluation)*, FNS seeks to learn how the seven retailer pilots operate, the implementation challenges and lessons learned, the characteristics of SNAP online customers, the risks and benefits of online purchasing for the integrity of SNAP, and the requirements for expansion. The results of this evaluation will inform FNS' decisions about how to make SNAP online purchases more widely available, how to ensure the accessibility and quality of online purchases, and how to ensure that protections against abuse remain strong or grow stronger. Ultimately, the findings from this evaluation will help FNS in setting new requirements, policies, and procedures for authorization of online retailers.

Evaluation Objectives

The SNAP Online Purchasing Evaluation has two overarching objectives. First, the evaluation provides an opportunity to document the **implementation** of each retailer's online purchasing pilot, including: key design and policy decisions related to the SNAP online purchasing experience (e.g., design of the online user interface, process flow prior to transaction submission, customer policies, approach to fulfillment/delivery, and post-transaction customer service); the process, challenges, and lessons of implementation; the characteristics of SNAP households that shop online; and the level of effort for stakeholders (e.g., retailers, States, EBT host processors). Second, this evaluation will explore the pilots' outcomes related to program **integrity**, through examination of: delivery patterns and their relationship to customer addresses and retailer locations; customer profiles and their relationship to EBT cards and SNAP households; customer redemption patterns; and issues related to refunds.

This Information Collection Request (ICR) includes eight data collection instruments:

- Discussion Guide: EBT Host Processor Key Informants (Appendix B)
- Discussion Guide: Third-Party Processor Key Informants (Appendix C)
- Discussion Guide: Retailer Key Informants (Appendix D)
- Discussion Guide: State Agency EBT Coordinator Key Informants (Appendix E)
- Data request: Retailer Detailed Transaction Data Files (Appendix F)
- Data request: Retailer Summary Transaction Data Files (Appendix G)
- Data request: Retailer Store Files (Appendix H)
- Data request: State SNAP Case Record Files (Appendix I)

A2. Purpose and Use of the Information.

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

This section of the supporting statement provides an overview of the evaluation design and data collection efforts planned to meet the overall objectives of the SNAP Online Purchasing Evaluation.

Overview of the Evaluation Design

The evaluation will document the implementation of each retailer's online purchasing pilot and explore the pilot's outcomes related to program integrity through the collection of two types of data: (1) qualitative data obtained through key informant interviews; and (2) operational data on online transactions, retailers' stores, and SNAP households. FNS seeks one-time approval for eight instruments within this ICR.

Key Informant Interviews

FNS is seeking one-time approval for the administration of four instruments to guide the key informant interviews: (1) Discussion Guide: EBT Host Processor Key Informants (Appendix B); (2) Discussion Guide: Third-Party Processor Key Informants (Appendix C); (3) Discussion Guide: Retailer Key Informants (Appendix D); and (4) Discussion Guide: State Agency EBT Coordinator Key Informants (Appendix E).

Interviews will be conducted by trained interviewers using semi-structured discussion guides (Appendices B-E) for each group of key informants. The guides will be tailored for each respondent, allowing the interviewers to focus on relevant questions, with appropriate follow-up probing and elaboration. The interviews will document how the participating online retailers, their web service providers (if applicable), and EBT host processors implement the pilots. Key informant interviews will also document the roles of the third-party processor that provides secure PIN-entry service for the pilot retailers, and State SNAP Agencies. Some questions may be more easily addressed through observation.

Two teams will conduct interviews. The Non-Technical Interview Team will focus on respondents whose role in the pilot is related to non-technical pilot design, order fulfillment and delivery, customer service, and pilot management and oversight; the Technical Interview Team will focus on respondents whose role in the pilot is related to technical changes to systems, processing online SNAP transactions, and security and integrity. Each interview will be conducted by an experienced trained interviewer familiar with EBT and SNAP operations. Where feasible, a junior team member will take notes. Otherwise, interviews will be recorded and transcribed. Respondents will be told the recording is voluntary and not required to participate in part or in whole with this data collection request. After each round of interviews,

teams will conduct telephone follow-up using the semi-structured discussion guides (Appendices B-E), as necessary, to clarify responses.

The evaluation team will begin identifying key contacts and the most appropriate respondents during initial telephone calls with pilot retailers and FNS. During these calls, the evaluation team will provide an overview of the discussion topics and work with pilot retailer staff to determine who should be the primary point of contact for the evaluation as well as which staff are best suited to participate in the interviews. The evaluation team will contact respondents by email to request their participation and will follow-up by telephone to further explain the evaluation, and schedule times for the interview. Interviews with key informants will be conducted in person or by telephone. In-person interviews are preferred with small pilot retailers and respondents with a key role in multiple pilots (e.g., third-party processor and EBT host processor representatives).

For retailers operating in more than one State, the evaluation will conduct two rounds of interviews with each pilot retailer (Appendix D) to allow for staggered starts across States. For retailers operating the pilot in only one State, the evaluation will conduct one round of interviews with the pilot retailer. The evaluation will conduct one round of interviews with each State SNAP Agency EBT Coordinator (Appendix E). While conducting these interviews early in the pilot would allow us to gather information while start-up is fresh in the minds of key informants, waiting until the pilot is operating in a “steady state” would allow us to capture more of the pilot experience. Therefore, the evaluation team prefers later interviews as they should allow us to answer the full array of research questions. Interviews with the EBT host processors (Appendix B) and the third-party processor (Appendix C) will not be aligned with any specific retailer pilot timeline, but will occur in three rounds spread across the overall pilot implementation period.

There will be a staggered start to the retailer pilots, with each retailer having its own schedule for implementation. Each retailer will operate its pilot in a specified area of a single State for at least one month prior to expanding to the full scope of the pilot. The first interviews scheduled are likely to be those related to pilots that start earlier.

Operational Data

The evaluation team will collect four types of operational data: (1) retailer detailed transaction files (Appendix F); (2) retailer summary transaction files (Appendix G); (3) retailer store files (Appendix H); and (4) State SNAP case records (Appendix I). Providing the retailer detailed transaction files will be optional for retailers, and retailer store data files will be requested only if a retailer has more than one store in the pilot. Data will be obtained from retailers and State SNAP agencies. Exhibit A.2.1 provides a summary of the operational data files, including description and source, with further explanation of each file below. Files will be submitted monthly for 12 months via the evaluation team's secure data transfer application, Huddle, or an equivalent secure data transfer system provided by a retailer or State. During the planning phase of the evaluation, the evaluation team will share draft data specifications with retailers and State SNAP agencies and obtain their feedback on the feasibility of providing the specified data.

The data collection will cover only the geographical areas in which retailers operate the pilot. Therefore, the evaluation team will limit our collection of SNAP case record files to the States in the pilots.

Exhibit A.2.1. Summary of Operational Data

File Name	File Description	Data Source
Retailer Detailed Transaction Data Files	Detailed individual-level, transaction data on SNAP online purchases	Pilot Retailers
Retailer Summary Transaction Data Files	Aggregated metrics on SNAP online purchases	Pilot Retailers
Retailer Store Files	Lists of stores with location data and FNS store authorization number	Pilot Retailers/Web Service Providers
State SNAP Case Record Files	Administrative data on SNAP participants	States

The evaluation team will obtain retailer summary transaction data files and detailed transaction files (when available) directly from pilot retailers for the first twelve months of each retailer's pilot. The Request for Volunteers for the SNAP Online Purchasing Pilot specified that retailers are expected to provide these data. The monthly retailer summary transaction file (Appendix G) will include specific overall metrics on online transactions, order fulfillment, and customer service needed to answer research questions. The retailer detailed transaction (Appendix F) file will include household-level, personal identifiable information (PII) transaction data that is not available through the SNAP Online Purchasing Pilot (OPP) EBT transaction data that will be provided by FNS (a dataset that includes some but not all of the online transaction data and SNAP participant data needed for the evaluation). The retailer detailed transaction data will include EBT and (where possible) non-EBT transactions related to online orders made by SNAP participant online customers (a subset of all SNAP participants)⁴, and the data elements will include payment method and amount, billing address, timing of orders and pickup/delivery, and reason for refunds. It may be necessary to obtain separate data on

⁴ This data would only include data that the stores collect as part of their regular transaction process and would conform to their regular terms and conditions for all of their online transactions.

purchase and shipments, if the retailer fulfills purchases made with the same payment in multiple shipments. All of these data elements are needed to answer evaluation research questions. These data will be used to construct the monthly household-level analysis files for all SNAP participants (individuals or households) who ever redeemed their benefits through online ordering.

The evaluation team will receive from FNS lists of pilot stores (which met the recruitment criteria) with location data and FNS authorization number (Appendix H). These data will be matched to the retailer detailed and summary data to identify and characterize the store locations used for fulfillment of online SNAP purchases.

Finally, for each State participating in the pilot, the evaluation team will request SNAP case record files for all active SNAP households (Appendix I). Data for all active SNAP participants are required to calculate the likelihood that SNAP household made online purchases and to estimate models of the household characteristics associated with online SNAP purchasing. The evaluation team will request SNAP case record files for each month of the online transaction data collection period to ensure that we have demographic data for all SNAP households and their members (including size of household, number of children, presence of elderly or disabled participants, age, categorical eligibility, income, assets, employment status, race/ethnicity, sex, education, benefit size, and benefit issuance date) during the pilot period. The evaluation team will request both household and individual level characteristics. The FNS OPP EBT transaction data file will include address information for SNAP households from State SNAP case record files.

A3. Use of information technology and burden reduction.

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

FNS is committed to compliance with the E-Government Act of 2002. The collection of information for the implementation study does not involve automated, electronic, mechanical, or other technological collection techniques. All data from key informants will be collected through telephone discussions where possible or in-person for respondents from small pilot retailers or those with a key role in multiple pilots.

Operational data collected for the integrity study will be submitted electronically using a secure transfer site (such as www.huddle.com), and in a format that is convenient for the retailers and States to provide the data. These data will be converted into data files that can be analyzed using SAS and GIS software. Out of 588 total responses for this collection, FNS estimates that 377 responses (64%) will be submitted electronically from both the retailers and the States.

A4. Efforts to identify duplication.

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

The purpose of the SNAP Online Purchasing Evaluation interviews and operational data collection is to obtain information about the SNAP Online Purchasing Pilot that are not available through any other source. The evaluation team will use existing sources of information, including FNS OPP EBT transaction data files and retailer files from FNS. The retailer summary transaction files and detailed transaction data files will contain data required to answer the

research questions that do not exist in the FNS OPP EBT transaction data files or the FNS Store Tracking and Redemption (STARS) database (OMB Control Number: 0584-0008; Expiration Date: 01/31/2021) retailer data.

A5. Impacts on small businesses or other small entities.

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The data being collected is being held to the minimum amount required to gain an understanding of the implementation and impact of online SNAP purchases from the retailers' perspective. Two of the seven retailers participating in the pilot evaluation are small businesses, with a maximum of 14 respondents from each. These small retailers use web service providers whose staff will provide transaction data to the evaluation team and answer questions related to technological changes related to the pilot, thereby minimizing the burden imposed on the retailers. In addition, the evaluation team will tailor the Discussion Guides, as appropriate, to consolidate interviews and further minimize burden on retailer staff.

A6. Consequences of collecting the information less frequently.

Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This is a mandatory, one-time data collection. Without this effort, FNS will not be able to determine the feasibility and program integrity impacts of expanding SNAP online purchasing to additional retailers allowing SNAP recipients to use their benefits to make purchases online.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **Requiring respondents to report information to the agency more often than quarterly;**

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Retailers will provide detailed transaction (when available) and summary transaction data files monthly over the course of 12 months. Likewise, States will provide SNAP case record files monthly for 12 months. The *Final Evaluation Report* and pilot-specific appendix chapters will be restricted use and not publicly disseminated. Pilot retailers will review the relevant appendix chapter and the relevant sections of the *Final Evaluation Report* for their respective pilots to assure that no proprietary information is shared with competitors or anyone other than evaluation and authorized FNS staff.

Some of the data retailers provide may be considered proprietary corporate data that if released would provide a competitive advantage to their competition. This data is necessary to conduct the integrity analysis, which will need to examine the online redemption processes in order to determine if there are areas of vulnerability in the various retailers processing and delivery systems. However, FNS believes that this data is protected under exception B4 to the

Freedom of Information Act⁵, which is applied by Executive Order 12600⁶. Hence, the data cannot be released to the public.

There are no other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

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

Federal Register Notice and Comments

A notice was published in the Federal Register Notice on July 30, 2018, Volume 83, No. 146, pages 36515-36516.⁷ Six information collection related comments were received by FNS. Comments that were germane to the evaluation plans are addressed in this Supporting Statement and Appendix J (Appendices J1-J12 present six sets of comments received and FNS responses to Public Comments).

⁵ (b) This section does not apply to matters that are— [...] (4) trade secrets and commercial or financial information obtained from a person and privileged or confidential;

⁶ <https://www.archives.gov/federal-register/codification/executive-order/12600.html>

⁷ <https://www.gpo.gov/fdsys/pkg/FR-2018-07-30/pdf/2018-16220.pdf>

Consultations Outside the Agency

Draft specifications for data to be requested from retailers were provided to representatives of four retailers to solicit their input on the definition of the data elements and how they can be obtained from the retailers' systems. This input will be used to tailor the data requests to individual retailers. The following retailer representatives reviewed the data elements:

Derrick Lagomarsino, Manager, Omnichannel Experience, Walmart eCommerce
Telephone: 800-925-6278

Willie Sugay, Senior Technical Program Manager, Walmart Global eCommerce
Telephone: 800-925-6278

Sue Knotts, Senior Manager, Retail IT, Wakefern Food Corp.
Telephone: 908-527-3300

Tina McGarry, Project Manager, Retail Initiatives, Wakfern CISD
Telephone: 908-527-3300

Cheryl Williams, Chief Information Officer, Wakefern Food Corp.
Telephone: 908-527-3300

Joe Dash, Owner, Dash's Markets, Inc.
Telephone: 716-834-0246

Rohan Tyagi, Principal Product Manager, SNAP EBT Program, Amazon.com
Telephone: 206-646-3517

In addition, the draft specifications and methodology were reviewed by a representative of the National Agricultural Statistics Service (NASS) Summary, Estimation, and Disclosure Methodology Branch:

Sarah Goodale, Mathematical Statistician, NASS Summary, Estimation, and Disclosure Methodology Branch
E-mail: Sarah.Goodale@nass.usda.gov

It is not feasible to pretest the key informant discussion guides as the only individuals familiar with the design and implementation of SNAP online purchasing are directly involved in the pilot.

Instead, an individual with expertise in EBT and the retailer industry reviewed the discussion guides:

Robert A. Bucceri, General Partner at Chaddsford Planning Associates, LLC.
Telephone: 610-918-1161

A9. Explain any decisions to provide any payment or gift to respondents.

There are no plans to provide any payments or gifts to respondents.

A10. Assurances of confidentiality provided to respondents.

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

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on March 31, 2000, Volume 65, Number 63, and is located on pages 17251-17252 discusses the terms of protections that will be provided to respondents. Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the protection of records maintained by a Federal agency according to either the individual's name or some other identifier. States will be assured that any administrative data they provide will be kept private.

All respondents' information will be kept private and not disclosed to anyone but the analysts conducting this evaluation, except as otherwise required by law. Respondents to key informant interviews will be informed of all planned uses of data, and that their information will be kept private to the extent permitted by law.

During the life of the project, hard-copy documents containing personal identifiable information (PII) will be stored in secured file cabinets and rooms, and electronic data will be

maintained on secured, password-protected computer servers. Interviewers will keep notes and documents secure at all times while in the field. Both sources of data will be accessible only by approved contractor staff. At the close of the evaluation, all hard-copy documents will be sent to secure storage and shredded as permitted under our contract.

All evaluation staff are required to sign a confidentiality pledge (Appendix L). In this agreement, staff pledge to maintain the privacy of all information collected from the respondents and not to disclose it to anyone other than authorized representatives of the evaluation. Issues of privacy will be discussed during training sessions to staff working on the project.

To document the evaluation results and ensure that FNS can replicate the evaluation results, the evaluation team will prepare restricted-use files for FNS in SAS or Stata, NVivo, and any standard nonproprietary formats specified by FNS, as well as provide documented analytic code and codebooks. The evaluation team will discuss with FNS the kinds of identifiers and GIS data to be included in these restricted-use files. The evaluation team wishes to provide the maximum feasible assurance of confidentiality for online SNAP customers. No names or exact addresses of customers will appear in the restricted-use files, and the only retailers identified by name or address will be those conducting the pilots. However, some data necessary to replicate the analysis (particularly location coordinates and EBT account numbers) could be used by FNS or others with access to the restricted-use files to identify individuals. As discussed below, such deductive disclosure could be a violation of retailers' data sharing agreements with the evaluation team. Potential solutions include masking location data, scrambling identifiers, or providing files in a locked format that requires the user to accept an agreement that prohibits use of data to identify individuals.

In preparing the restricted-use files, the evaluation team will abide by any restrictions established by data-use agreements with the retailers and States regarding the identifiers provided. While the evaluation team has been advised that SNAP data requests on behalf of USDA are exempt from State IRB review (Appendix M), the team will address any State objections to the data requests that may arise. The evaluation team notes that the only direct identifiers that the team plans to collect will be the name, EBT account number, and State SNAP case record numbers in the FNS OPP transaction file, which will already be in FNS' possession.

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 are no questions of a sensitive nature included in this information collection. Several items in the detailed transaction data (Appendix F) and summary transaction data (Appendix G) may be considered proprietary corporate data by some of the retailers. These data are necessary because they will be used to answer questions about delivery patterns and their relationship to customer addresses and retailer locations; customer profiles and their relationship to EBT cards and SNAP households; customer shopping patterns; and problems such as refunds and cancelled or unfulfilled orders. Providing detailed transaction data (Appendix F) is optional and at the discretion of the individual retailers. The evaluation team will inform retailers that no proprietary information will be shared with competitors or anyone other than evaluation team and authorized FNS staff.

A12. Estimates of the hour burden of the collection of information.

Provide estimates of the hour burden of the collection of information. Indicate the number

of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.

The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond, and annual hour burden are shown in the attached Burden Table (Appendix K). FNS anticipates 100 percent participation and there is no recordkeeping burden imposed in this data collection request. A summary of the burden estimate appears below in Exhibit A.12.1. This table assumes all retailers will provide the optional retailer detailed transaction files.

Exhibit A.12.1. Estimated Burden for SNAP Online Purchasing Evaluation

Respondent Category	Type of respondents (optional)	Appendices	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
Business (Profit)	Retailer personnel who handle the fulfillment, shipping, and delivery of EBT customer orders (multi-State retailers)	D	15	2	30	3	90.0	\$12.29	\$1,106.10
Business (Profit)	Retailer personnel who handle the fulfillment, shipping, and delivery of EBT customer orders (single-State retailers)	D	6	1	6	3	18.0	\$12.29	\$221.22
Business (Profit)	Retailer customer service managers (multi-State retailers)	D	15	2	30	2	60.0	\$20.55	\$1,233.00
Business (Profit)	Retailer customer service managers (single-State retailers)	D	6	1	6	2	12.0	\$20.55	\$246.60

Respondent Category	Type of respondents (optional)	Appendices	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
Business (Profit)	Retailer IT personnel	D	10	2	20	2	40.0	\$35.63	\$1,425.20
Business (Profit)	Web service provider personnel	D	4	1	4	2	8.0	\$35.63	\$285.04
Business (Profit)	Retailer project managers (multi-State retailers)	D	20	2	40	3.5	140.0	\$38.14	\$5,339.60
Business (Profit)	Retailer project managers (single-State retailers)	D	8	1	8	3.5	28.0	\$38.14	\$1,067.92
Business (Profit)	Retailer personnel who completed the pilot application (multi-State retailers)	D	10	2	20	2	40.0	\$38.14	\$1,525.60
Business (Profit)	Retailer personnel who completed the pilot application (single-State retailers)	D	4	1	4	2	8.0	\$38.14	\$305.12
Business (Profit)	Retailer data manager	F, G,H	5	3	15	2	30.0	\$44.59	\$1,337.70

Respondent Category	Type of respondents (optional)	Appendices	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden	
Business (Profit)	Web service provider data manager	F, G,H	2	3	6	2	12.0	\$44.59	\$ 535.08	
Business (Profit)	Retailer data manager	F, G,H	5	36	180	1	180.0	\$42.08	\$7,574.40	
Business (Profit)	Web service provider data manager	F, G,H	2	36	72	1	72.0	\$42.08	\$3,029.76	
Business (Profit)	Third-party processor personnel	C	3	3	9	2	18.0	\$44.59	\$802.62	
Business (Profit)	EBT host processor managers	B	6	3	18	2	36.0	\$44.59	\$1,605.24	
Sub-Total Business-for-not-for-Profit				121	3.8677685 95	468	1.692	792.0	-	\$27,640.20
State Government	State agency EBT coordinators	E	16	1	16	1	16.0	\$33.91	\$542.56	
State Government	State agency SNAP program/data staff	I	8	1	8	2	16.0	\$44.59	\$713.44	
State Government	State agency SNAP program/data staff	I	8	12	96	1	96.0	\$42.08	\$4,039.68	

Respondent Category	Type of respondents (optional)	Appendices	Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
Sub-Total State Agencies			32	3.75	120		128.0	-	\$5,295.68
GRAND TOTAL			153	3.843	588	1.565	920	-	\$32,935.88

Burden Summary:

Affected Public: 7 retailers, 2 web service providers, 1 third-party processor, 2 EBT host processors, 8 State agencies

Estimated Number of Respondents: 153

Estimated Number of Responses per Respondent: 3.843

Estimated Total Annual Responses: 588

Estimated Time per Response: 1.565

Estimated Total Annual Burden: 920

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

The total annual cost to respondents is \$32,935.88 (\$ 43,804.72, with fully loaded wages) To estimate public cost, the evaluation team used the mean (average) hourly wage data for the respondents, as published by the U.S. Department of Labor, Bureau of Labor statistics (https://www.bls.gov/oes/current/oes_nat.htm), May 2017. The average hourly wage for retailer personnel who handle fulfillment, shipping, and delivery of EBT of customer orders is based on Bureau of Labor Statistics code 43-5081, Stock Clerks and Order Fillers (\$12.29; under North American Industry Classification System code 4450A1 – Food and Beverage Stores). The average hourly wage for retailer customer service managers is based on Bureau of Labor Statistics code 41-1011, Front Line Supervisors of Retail Workers (\$20.55; under North American Industry Classification System code 4450A1 – Food and Beverage Stores). The average hourly wage for retailer project managers is based on Bureau of Labor Statistics code 11-102, General and Operations Managers (\$38.14; under North American Industry Classification System code 4450A1 – Food and Beverage Stores). Bureau of Labor Statistics

code 15-1134, Web Developer (\$35.63) is used to determine the average hourly wage for retailer IT personnel and web service provider personnel. Bureau of Labor Statistics code 15-1131, Computer Programmers (\$42.08), is used to determine the average hourly wage for retailer and web service provider data managers and State SNAP agency staff transferring data files to the evaluation team. Bureau of Labor Statistics code 15-1121, Computer System Analyst (\$44.59) is used to determine the average hourly wage for retailer and web service provider and State SNAP agency staff involved in discussions about and programming for transferring data files to the evaluation team. This code is also used to determine the average hourly wage for third-party processor and EBT host processor managers who will participate in in-depth interviews.

A13. Estimates of other total annual cost burden.

Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

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

A14. Provide estimates of annualized cost to the Federal government.

Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Annual costs to the Federal government will be \$868,797.94 per year. The largest cost to the Federal Government is to pay the contractor (\$844,562.52 per year, with fully loaded wages). The information collection also assumes a total of 350 hours of a Federal Employee's time per year: for a GS-13, Step 6 in the Washington, DC area, at \$54.21 per hour for a total of

\$25,235.42 per year, with fully loaded wages. The Federal Employee pay rate is from the Office of Personnel Management (OPM).

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 submission is a new information collection request as a result of program changes and will add 920 burden hours and 588 total annual responses to OMB's inventory.

A16. Plans for tabulation, and publication and project time schedule.

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

The evaluation team will prepare analytic tables and graphics, and a separate appendix chapter integrating implementation and integrity evaluation findings for each pilot after its data collection is completed. After all pilot chapters are complete, the evaluation team will prepare a report synthesizing findings across the pilots. The final report and pilot-specific appendix chapters will be restricted use and not publicly disseminated.

The evaluation team will prepare restricted-use files for FNS in SAS or Stata, NVivo, and any standard nonproprietary formats specified by FNS, as well as provide documented analytic code and codebooks. There will not be any public-use files. A project timeline is presented in Exhibit A.16.1.

Exhibit A.16.1: SNAP Online Purchasing Evaluation Timeline

Project Activity	Date (or Months After OMB Approval)
Collect data	2 weeks after OMB approval – 13 months after OMB approval
Prepare appendix chapters	13 months – 16 months after OMB approval
Prepare final report	15 months – 21 months after OMB approval

Prepare restricted use data sets	16 months after OMB approval
Prepare final briefing for FNS staff	18 months after OMB approval

A17. Displaying the OMB Approval Expiration Date.

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19.

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

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.