

APPENDIX A-12: WESTAT IRB APPROVAL LETTER



An Employee-Owned
Research Corporation

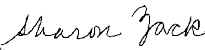
Memo

Date: July 16, 2018

To: Frank Bennici, Project Director

From: Sharon Zack, Administrator Westat IRB

**Subject: Initial Approval of SNAP PARTICIPATION & WORK,
Project Number 6564
FWA 0005551**


Sharon Zack
2018-07-16 01:56 PM
I agree to the terms defined by the placement of my signature

As Administrator of the Westat Institutional Review Board (IRB), I reviewed the materials submitted for the following: **SNAP PARTICIPATION & WORK, Project Number 6564**. The Westat IRB reviews all studies involving research on human subjects. The Food and Nutrition Service, at USDA, funds this study.

The purpose of this study is to examine and understand current and past workforce participation characteristics among nondisabled SNAP participants.

Westat will conduct the following activities:

- Develop and cognitively test the survey instrument;
- Obtain sample frame data from all 50 states and the District of Columbia;
- Draw the state and national samples for the survey;
- Administer sequentially the web, telephone, and field interview survey;
- Analyze the data;
- Write reports, and deliver public use data files and restricted use data files to FNS.

Social Policy Research Associates (SPRA), Westat's subcontractor on the study, will assist in the revision of the study plan, development and pretesting of the survey instrument and the analysis and reporting. A reliance agreement has been executed to retain authority over human subjects for SPRA.

In order to obtain a sampling frame, Westat will reach out to the 50 states and the District of Columbia to address issues related to the sharing of data, including developing Data Use Agreements and addressing State IRB reviews, if applicable. As per the agreements, the states will provide these files with personally identifiable information (PII) without prior written consent of the respondents. The states will transfer the files to Westat via a secure FTP site.

IRB regulations permit expedited review of certain activities involving minimal risk [45 CFR pt. 46.110]. This study can be considered minimal risk and is approved under expedited authority. Per 45 CFR 46 116 (d), a waiver of all of the requirements to obtain informed consent is approved as:

1. The research involves no more than minimal risk to the subjects;
2. The waiver or alteration will not adversely affect the rights and welfare of the subjects;
3. The research could not practicably be carried out without the waiver or alteration; and
4. Whenever appropriate, the subjects will be provided with additional pertinent information after participation.

Per 45 CFR 46.117(c)(2), a waiver of documentation of informed consent is also approved as the research is no more minimal risk to the subjects and involves no procedures for which written consent is normally required outside of the research context.

Please note the following:

- You are required to submit this study for a continuing review before July 16, 2019.
- IRB approval is required before any new or modified research activities are conducted or when there is a problem involving risks to human subjects.
- Upon learning of an incident, you must contact the IRB Office within 24 hours via telephone (301-610-8828) or email (IRB@westat.com).

cc: Institutional Review
Board
Alicia
Sutherland