

Supporting Statement Part A

OMB No. 0584-[NEW]

Job Search as a Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Component

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Part A. Justification

A.1. 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. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new information collection request. The Food and Nutrition Act of 2008, as amended through Pub. L. 113-128, enacted July 22, 2014 [7 U.S.C. 2026], provides the legislative authority for the U.S. Department of Agriculture's (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 the authority to FNS to conduct research to help improve the administration and effectiveness of SNAP (see Attachment A: Legal Authority Statutes and Regulations).

The Food Security Act of 1985 established the SNAP employment and training (E&T) program to help SNAP recipients gain the "skills, training, or experience that will increase their ability to obtain regular employment" and achieve economic self-sufficiency. Although all States must operate a SNAP E&T program, they have considerable flexibility in designing their programs, including whether to make them mandatory or voluntary, what E&T components to include, and what populations and locations to target.

States can choose any number of SNAP E&T components to offer to SNAP E&T participants. Of these activities, which are outlined in annual State E&T plans, States report job search and job search training as being the most common and having the highest participation rates. FNS's recent SNAP E&T Characteristics Study (OMB Control Number: 0584-0602; Expiration Date: 05/31/2018) found 88 percent of E&T providers in surveyed States offered job search, and 62 percent of E&T participants took part in this activity (Rowe, Brown, & Estes, 2017).

Under current regulations, States can implement job search and job search training in a variety of ways. In most States, participants take part independently by using online tools and other resources to conduct a self-directed job search. In other States, counselors provide job search training through group activities or individualized assistance.

A.2. Purpose and Use of the Information

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

Use of Information Collected

The primary purpose of this study is to document the types of job search activities offered through SNAP E&T programs, examine State implementation of those activities, and assess the effectiveness of those activities in moving participants toward employment. Therefore, FNS is requesting Office of Management and Budget (OMB) approval to collect information from a sample of participating State SNAP offices, local SNAP offices, SNAP E&T providers, other SNAP E&T stakeholders, State agencies with wage record data, and SNAP job search participants. The study will profile the job search component of SNAP E&T programs in four States (Connecticut, Michigan, Oregon, and Tennessee) via site visits. (The State selection process and criteria are described in Statement B.)

FNS seeks to better understand the types of job search activities offered through SNAP E&T programs, examine State implementation of those activities, and better understand the effectiveness of those activities in moving participants toward self-sufficiency. FNS will use findings from the study to inform program enhancements and SNAP E&T policy and guidance to States. States may also use study findings to improve their job search components.

Study Objectives

The research objectives of this study as defined by FNS and a table showing the research objectives by data source is provided in Attachment B: Research Objectives and Approach to Data Collection.

Frequency of Use for Information Collected

Data collected as part of this study will be critical to helping FNS better understand job search activities, an understudied but crucial component of many States' SNAP E&T programs. With these data, FNS will learn recommended practices for program implementation and will identify job search activities that are most successful in helping participants work toward achieving self-sufficiency. FNS expects to use the information collected through this study in several instances in the years following the study as it works to enhance guidance to States that can ultimately improve SNAP E&T programs.

Information Sharing With Other Organizations

FNS plans to post the final report with detailed findings in aggregate form on the FNS website. FNS may share the datafiles, which will not include any personally identifiable information that would compromise participant privacy, with other entities as requested.

A.3. Use of Information Technology and Burden Reduction

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

This study will comply with the E-Government Act of 2002 (Pub. L. 107-347, 44 U.S.C. Ch 36).

We describe the extent to which the collection of information in this study involves electronic techniques and other considerations to reduce burden for each of the key data collection components.

- ▶ **Administrative Data.** The study will collect the submissions of SNAP administrative data (OMB Control Number: 0584-0594; Expiration Date: 02/29/2020 currently under OMB review) and wage data electronically at <http://snap.insightpolicyresearch.com> using the study team's file transfer protocol (FTP) site exchange or with a secure file transfer protocol (SFTP) utilizing a third party client (see Attachments C and D: FTP Site Instructions for Submitting Administrative Data and Email to States With FTP Password). Each data administrator will submit a complete file with 12 months of SNAP administrative data and 24 months of wage data on one occasion. Data will not be submitted on a monthly basis.
- ▶ **Site Visits.** Data collected on the site visits will be collected in person by trained and experienced researchers conducting in-person interviews and observations using semi-structured protocols (see Attachments E, F.1, F.2, G, H, I.1, I.2, J: State SNAP Director and E&T Director Protocol, Local SNAP Office Director Protocol, Local SNAP Office Frontline Staff Protocol, Process-Mapping Protocol, Observation Checklist, E&T Provider Director Protocol, E&T Provider Frontline Staff Protocol, and Other Stakeholder Protocol). During the State SNAP director and SNAP E&T director in-person interview, the study team will also collect information about administrative costs of the SNAP E&T program. In advance of each site visit, the study team will ask the State SNAP director or E&T director to complete a cost table prepopulated with cost information available in the State E&T plan (see Attachment K: Administrative Cost Table and Transmittal Email); the information provided in this table will be reviewed and confirmed at the end of the interview on site. The study team will email the cost table to the State SNAP director in the form of a Microsoft Word document. Information technology will not be used for site visit data collection.
- ▶ **Telephone Interviews.** Data collected during interviews will not employ information technology. Instead, data will be collected over the telephone by trained and experienced researchers conducting interviews using semi-structured protocols (see

Attachment L: Participant Protocol). However, individuals can schedule an interview using information technology by calling a toll-free number during Eastern Daylight Time business hours or by visiting Calendly.com, a scheduling website (see Attachment U: Participant Advance Letter). The toll-free number will forward to the telephone line of a study team member who will directly schedule the interview, or else return a voicemail to schedule the interview. Offering a telephone number and an automated scheduling website (see Attachment V: Description of Scheduling Tool) to individuals is intended to reduce burden by providing potential respondents flexibility to schedule an interview at a time that is convenient for them.

All in-person and telephone interviews will be recorded with the permission of respondents, using digital voice recorders, to aid in note taking. FNS anticipates 90 percent of these data will be collected electronically.

A.4. Efforts to Identify Duplication and Use of Similar Information

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

There is no similar prior or ongoing information collection being conducted that duplicates the efforts of the proposed data collection. Every effort has been made to avoid duplication, including identifying which E&T variables States are already collecting, to minimize States' time burden of cleaning and submitting datafiles to the study team. To make use of data already provided by States, the research team will obtain and review preliminary information on the E&T procedures and processes in each State and existing outcome measures. However, a large part of the study depends on obtaining information through in-person or telephone interviews, in-person observations, and in-person process-mapping exercises in the four States to develop a detailed understanding of the E&T process and participant barriers and outcomes, as well as linking SNAP administrative data to wage data to assess the effect of participation in job search on participant outcomes. Since January 1, 2018, States have been required to submit aggregate

data on a limited number of E&T outcome measures, including the number of participants and former participants in unsubsidized employment and their median earnings after completing E&T.¹ Although the study team will examine these reports, they do not contain information sufficient to meet the needs of this study. First, they are aggregate measures, whereas individual-level outcome data are needed to assess respondents' experiences with State SNAP job search programs. Second, these outcome reports provide only a limited amount of data and do not include information such as participants' expectations and motivations for participating; perceptions of what worked well and not as well about the program; barriers and facilitators to participation; reasons for exiting the program; and other measures needed to address the study goals. This new data collection will provide the data needed to fully understand how job search activities affect E&T participation and participant outcomes.

A.5. 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.

Some of the E&T providers could be small businesses or nonprofit organizations that are integral to providing E&T services within States. As such, the study must include these organizations. The E&T provider interview protocols (see Attachments I.1 and I.2: E&T Provider Director Protocol and E&T Provider Frontline Staff Protocol) have been designed to impose minimal burden on participating businesses and organizations. The information to be requested during the interviews will be the minimum required for the intended use. FNS estimates that of the businesses to be interviewed for this study, approximately 50 percent, or 1 of the 2 businesses participating in the study, are considered small businesses.

¹ See the FNS Office of Employment and Training memorandum that describes the E&T outcome data States must report annually beginning January 1, 2018, found here: <https://fns-prod.azureedge.net/sites/default/files/snap/Implementation-Memo-SNAP-ET-Program-Monitoring-Oversight-Reporting-Measures.pdf>

A.6. Consequences of Collecting the Information Less Frequently

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

This is a one-time voluntary data collection request. If this information collection is not conducted, FNS will have a limited understanding of the types of job search activities that are offered through SNAP E&T programs and States' implementation of those activities. Without this information, FNS will not be able to enhance job search policy and guidance for State SNAP agencies. With a greater focus on SNAP E&T programs nationwide, it is critical for FNS to have a detailed, granular understanding of the effectiveness of E&T job search activities in moving participants toward employment. There are no anticipated obstacles to reducing burden.

A.7. Special Circumstances Relating to the Guideline 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 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 which unnecessarily impedes sharing of data with other agencies for compatible confidential use**
- ▶ **Requiring respondents to submit proprietary trade secret or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause FNS to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, 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.

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 form, and on the data elements to be recorded, disclosed, or reported.

Federal Register Notice and Comments

A notice of the proposed information collection and an invitation for public comment was published in the Federal Register Monday, April 8, 2019, at 84 FR 13862, volume 84, number 67, pages 13862 - 13867. The period for comments closed June 7, 2019. FNS received 2 comment(s) for this proposed information collection. The comments appear in Attachments M.1 and M.2: Federal Register Comment 1 and Federal Register Comment 2, and FNS responses to the comments appear in Attachment M.3 and M.4: FNS Response to Federal Register Comment 1 and FNS Response to Federal Register Comment 2.

Consultations Outside the Agency

FNS consulted with a mathematical statistician from USDA's National Agricultural Statistics Service (NASS), who will review the study methodology and statistical procedures. The review from NASS and the study team's response to NASS's comments appear in Attachments N.1: NASS Comments and N.2: Response to NASS Comments, respectively.

The study team consulted with SNAP and other E&T personnel from the State of Maryland to conduct a pretest of the interview protocols. See table A.8.1 for a list of these individuals consulted outside the agency. After the pretest, the study team made minor revisions to the

instruments, including changing the order of some questions, deleting some questions to reduce redundancy, and making minor edits to clarify wording. See Attachment AA: Pretest Memorandum for details.²

Table A.8.1. Individuals Consulted Outside the Agency

Name	Title	Organizational Affiliation	Telephone Number
Daquiri Anderson	Director, Office of Workforce Development	Maryland Department of Human Services	410.767.8192
Marina Solovey	Workforce Development Coordinator	Maryland Department of Human Services	410.767.8820
Scott Espenscheid	Baltimore Ex-offender Reentry Program Manager	America Works	410.625.9675, extension 1016
Marsha Netus	Vice President and Regional Director	America Works	410.625.9675, extension 1069

A.9. Explanation of Any Payment or Gift to Respondents

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

SNAP participants who participate in the telephone survey³ will receive a generic \$30 gift card⁴ as a token of appreciation to offset any cellular airtime expenses used during the telephone interview. The cards will be mailed to the respondents following the interview. Attachment O (Use of Tokens of Appreciation) provides a detailed explanation of the factors supporting the use of these incentives for this study.

No payment or gift will be provided to any State SNAP agency, local office, E&T provider (government, business or other for profit or non-profit), or other stakeholder staff who participate in the interviews.

² This memorandum was drafted for internal FNS review as part of the instrument development phase.

³ Because the telephone interviews are meant to supplement the analysis, a relatively small (n=50) number of interviews will be conducted in each State in a common language. All interviews will be conducted in English to ensure themes can be identified and analyzed across the entire sample.

⁴ The research team has not pre-determined what type of gift card will be used. As has been done for our previous FNS studies, the research team typically asks a local respondent (e.g., our State point of contact during the planning phase) what the most useful type of gift card would be for SNAP participant respondents in their particular community. For example, in some communities it might be a local grocery store, whereas in another community it might be a national chain store. The generic Visa and MasterCard gift cards come with an activation fee above and beyond the value of the card, which increases costs and participants would not receive the full benefit of the token of appreciation.

A.10. Assurance of Confidentiality Provided to Respondents

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

In accordance with the Privacy Act of 1974, the study team will protect the privacy of all information collected for the study and will use it for research purposes only. No information that identifies any study participant will be released. All personally identifiable indicators obtained by the research team will be excluded from the analysis file. Examples of personally identifiable indicators include social security numbers, first and last names, and residential addresses. Observations in the analysis files will be identified by an arbitrary unique identifier. The terms and protections provided to respondents are discussed in two system of record notices: (1) FNS-8 USDA FNS Studies and Reports published in the Federal Register on April 25, 1991, volume 56, page 19078; and (2) USDA/FNS-10 Persons Doing Business with the Food and Nutrition Service, published in the Federal Register on March 31, 2000, volume 65, pages 17251-17252. Study respondents will be notified that the information they provide will not be released to anyone outside the research team in a form that identifies them except as otherwise required by law. No identifying information will be attached to any reports or data supplied to USDA/FNS or any other researchers. The identities of State SNAP office, local SNAP office, stakeholder agency, and E&T provider staff and SNAP participants will not be disclosed. Moreover, as part of the local SNAP office observation, all clients taking part in the observation will be asked for their verbal consent to participate and informed that participation will in no way affect their benefits, nor will any information provided be released except as otherwise required by law (see Attachment P: Client Consent Form for Observations). State SNAP offices submit datafiles using a secure FTP site, which prevents any unauthorized access to the information contained in the data submissions.

For reporting of results, data will be presented only in aggregate form so that individuals and institutions will not be identified. A statement to this effect will be included with all requests for data. All members of the research team with access to the data will be trained on the

importance of privacy and data security. All data will be kept in secure locations. Identifiers will be destroyed as soon as they are no longer required.

FNS's contractors will employ the following safeguards to protect privacy during the study:

- ▶ Computer datafiles will be protected with passwords, and access will be limited to specific users on the research team.
- ▶ Employees must notify their supervisor, the project director, and the contractor's security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner.

The Confidentiality Pledge in which employees of the contractor provide assurances to the above safeguards is provided in Attachment Q: Insight Policy Research Confidentiality Pledge.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature included in this information collection request.

A.12. Estimates of Hour Burden, Including Annualized Hourly Costs

Provide estimates of the hour burden of the collection of information. The statement should:

- ▶ **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour-burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- ▶ **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

This new information collection will have a total of 460 respondents (375 from respondents and 85 from nonrespondents). The affected public in this study will be 101 State and local government staff, 12 business or other for-profit staff, 19 nonprofit staff, and 328 individuals. FNS anticipates 100 percent participation from business or other for profits, non-profits, and State, Local, and Tribal governments.

The annual total estimated burden (hours) across all data collection components will be 517.85 hours, which rounds up to 518 hours (512.35 hours for respondents plus 5.5 hours for nonrespondents). Time per response will range from 3 minutes for reading the consent form for observations to 15 hours for submitting the wage datafile. The average frequency of response is 1.61 based on 741 total annual responses (631 responsive and 110 nonresponsive) made by the 460 respondents (375 responsive and 85 nonresponsive). Respondents will not be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping. Additionally, there is no third-party disclosure. Table A.12.1 and Attachment R: Total Public Burden Hours and Respondent Costs: Excel provide more detailed information about the burden and annualized costs to respondents for this collection.

The annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. The total annualized cost to respondents for the hour burdens for collections of information is \$14,607.92⁵ (\$12,614.36 for State and local government staff, \$317.17 for business E&T provider staff, \$497.90 for nonprofit E&T provider staff, and \$1,178.49 for individuals). This total annualized cost is calculated as the sum of the annualized costs by respondent category. For each respondent category, the annualized cost is the product of burden hours (including pretest burden and nonresponse burden) and an assumed wage rate for a corresponding occupation.

Wage rates are based on the 2018 national occupational employment and wage data from the U.S. Department of Labor's Bureau of Labor Statistics (DOL BLS, n.d.). According to these data,

⁵ Fully-loaded wages total \$18,990.30

the wage rates of State SNAP directors, E&T stakeholders, and State UI agency data use agreement (DUAs) liaison (\$58.44) are the average hourly earnings of workers in management occupations (occupation code 11-0000). The wage rates of State database administrators and State UI agency database administrators (\$44.25) are the average hourly earnings of workers in database administration occupations (occupation code 15-1141). The wage rates of E&T provider directors and local SNAP office directors (\$34.46) are the average hourly earnings of workers in social and community service management occupations (occupation code 11-9151). The wage rates of State E&T provider frontline staff, local SNAP office frontline staff, and business or other for-profit or nonprofit frontline staff (\$22.14) are the average hourly earnings of workers in community and social service specialist occupations (occupation code 21-1099). The wage rate of individuals/SNAP participants is the Federal minimum wage, \$7.25 an hour (DOL Wage and Hour Division [WHD], n.d.).

Table A.12.1. Total Public Burden Hours and Respondent Costs

Respondent Category	Type of Respondent	Instruments and Activities	Appendices Reference	Responsive											Nonresponsive			Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
				Sample Size	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)	Number of Nonrespondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)						
State, Local, and Tribal Government																				
State/Local/ Tribal Government	State SNAP Staff	Pretest	AA	1	1	1	1	2	2	0	0	0	0	0	2	\$58.44	\$116.88			
	State SNAP Staff	Advance materials and preparation, including all conference and scheduling calls	X	4	4	1	4	3	12	0	0	0	0	0	12	\$58.44	\$701.28			
	State SNAP Staff	In-person semi-structured interviews with SNAP Directors and E&T Managers	E	8	8	1	8	1.5	12	0	0	0	0	0	12	\$58.44	\$701.28			
	State SNAP Staff	Administrative cost table	K	4	4	1	4	1	4	0	0	0	0	0	4	\$58.44	\$233.76			
	Subtotal for State SNAP staff (unique)				9	9	1.9	17	1.76	30	0	0	0	0	30		\$1,753.20			
	State SNAP Database administrator	Pretest	AA	1	1	1	1	1	1	0	0	0	0	0	1	\$44.25	\$44.25			
	State SNAP Database administrator	Advance materials and preparation, including consultative data call	C; D	4	4	1	4	3	12	0	0	0	0	0	12	\$44.25	\$531.00			
	State SNAP Database administrator	Submit test file	T	4	4	1	4	4	16	0	0	0	0	0	16	\$44.25	\$708.00			
	State SNAP Database administrator	Submit administrative datafile	T	4	4	1	4	10	40	0	0	0	0	0	40	\$44.25	\$1,770.00			
	Subtotal for State database administrator (unique)				5	5	3	13	5.31	69	0	0	0	0	69		\$3,053.25			
UI Agency Database Administrator	Advance materials and preparation, including consultative data call	T	4	4	1	4	3	12	0	0	0	0	0	12	\$44.25	\$531.00				
UI Agency Database Administrator	Submit wage data file	T	4	4	1	4	15	60	0	0	0	0	0	60	\$44.25	\$2,655.00				

Respondent Category	Type of Respondent	Instruments and Activities	Appendices Reference	Sample Size	Responsive						Nonresponsive					Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
					Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)	Number of Nonrespondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)				
		Subtotal for UI agency database administrator (unique)		4	4	2	8	9	72	0	0	0	0	0	72		\$3,186.00	
	UI Agency DUA Liaison	Complete wage data DUA	S	4	4	1	4	8	32	0	0	0	0	0	32	\$58.44	\$1,870.08	
		Subtotal UI agency DUA liaison (unique)		4	4	1	4	8	32	0	0	0	0	0	32		\$1,870.08	
	SNAP E&T Job Search Stakeholder Agency	Advance materials and preparation	Y	4	4	1	4	1	4	0	0	0	0	0	4	\$58.44	\$233.76	
	SNAP E&T Job Search Stakeholder Agency	In-person semi-structured interview	J	4	4	1	4	1	4	0	0	0	0	0	4	\$58.44	\$233.76	
		Subtotal stakeholder (unique)		4	4	2	8	1	8	0	0	0	0	0	8		\$467.52	
State/Local/ Tribal Government (continued)	State E&T Provider	Advance materials and preparation	Y	3	3	1	3	1	3	0	0	0	0	0	3	\$34.46	\$103.38	
	State E&T Provider	In-person semi-structured interviews with one SNAP director/manager at three E&T providers	I.1	3	3	1	3	1	3	0	0	0	0	0	3	\$34.46	\$103.38	
	State E&T Provider	In-person semi-structured interviews with four frontline staff at three E&T providers	I.2	12	12	1	12	1	12	0	0	0	0	0	12	\$22.14	\$265.68	
	State E&T Provider	Observations of E&T process	H	3	3	1	3	0.05	0.15	0	0	0	0	0	0.15	\$22.14	\$3.32	
			Subtotal for State E&T provider (unique)		18	18	1.17	21	1	18.15	0	0	0	0	0	18.15		\$475.76
		Local SNAP Office Staff	Pretest	AA	1	1	1	1	2	2	0	0	0	0	0	2	\$22.14	\$33.21
	Local SNAP Office Staff	Advance materials and preparation	Y;Z	8	8	1	8	1	8	0	0	0	0	0	8	\$34.46	\$275.68	
	Local SNAP Office staff	In-person semi-structured interviews with one SNAP director/manager at two sites across four States	F.1	8	8	1	8	1	8	0	0	0	0	0	8	\$34.46	\$275.68	

Respondent Category	Type of Respondent	Instruments and Activities	Appendices Reference	Responsive						Nonresponsive						Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
				Sample Size	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)	Number of Nonrespondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)				
State/Local/Tribal Government (continued)	Local SNAP Office staff	In-person semi-structured interviews with two frontline staff at two sites across four States	F.2	16	16	1	16	1	16	0	0	0	0	0	16	\$22.14	\$354.24	
	Local SNAP Office staff	Group mapping exercise with five local staff at two sites across four States	G	40	40	1	40	1.5	60	0	0	0	0	60	\$22.14	\$1,328.40		
	Local SNAP Office staff	Observations of E&T process	H	8	8	1	8	0.05	0.4	0	0	0	0	0.4	\$22.14	\$8.86		
	Subtotal for local SNAP office (unique)				57	57	1.4	81	1.16	93.9	0	0	0	0	93.9		\$2,276.07	
State/Local/Tribal government subtotal (unique)					101	101	1.50	152	2.13	323	0	0	0	0	323.05	-	\$12,614.36	
Business or Other For Profit																		
Business or Other for Profit	E&T provider	Advance materials and preparation	Y	2	2	1	2	1	2	0	0	0	0	0	2	\$34.46	\$68.92	
	E&T provider	In-person semi-structured interviews with one SNAP director/manager at two E&T providers	I.1	2	2	1	2	1	2	0	0	0	0	2	\$34.46	\$68.92		
	E&T provider	In-person semi-structured interviews with four frontline staff at two E&T providers	I.2	8	8	1	8	1	8	0	0	0	0	8	\$22.14	\$177.12		
	E&T provider	Observations of E&T process	H	2	2	1	2	0.05	0.1	0	0	0	0	0.1	\$22.14	\$2.21		
Business or other for profit subtotal (unique)					12	12	1.17	14	1	12	0	0	0	0	12.1	-	\$317.17	
Nonprofit																		
Nonprofit	E&T provider	Pretest	AA	1	1	1	1	1	1	0	0	0	0	1	\$22.14	\$22.14		
	E&T provider	Advance materials and preparation	Y	3	3	1	3	1	3	0	0	0	0	3	\$34.46	\$103.38		
	E&T provider	In-person semi-structured interviews with one SNAP director/manager at three E&T providers	I.1	3	3	1	3	1	3	0	0	0	0	3	\$34.46	\$103.38		

Respondent Category	Type of Respondent	Instruments and Activities	Appendices Reference	Responsive						Nonresponsive						Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
				Sample Size	Number of Respondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)	Number of Nonrespondents	Frequency of Response	Total Annual Responses	Hours per Response	Annual Burden (Hours)				
Nonprofit (continued)	E&T provider	In-person semi-structured interviews with four frontline staff at three E&T providers	I.2	12	12	1	12	1	12	0	0	0	0	0	12	\$22.14	\$265.68	
	E&T provider	Observations of E&T process	H	3	3	1	3	0.05	0.15	0	0	0	0	0	0.15	\$22.14	\$3.32	
Nonprofit Subtotal (unique)				19	19	1.16	22	0.87	19	0	0	0	0	0	19.15	-	\$497.90	
Individuals																		
Individuals	SNAP participants	Pretest	AA	2	2	1	2	0.5	1	0	0	0	0	0	1	\$7.25	\$7.25	
	SNAP participants	Observations of E&T process	H	16	16	1	16	0.05	0.8	0	0	0	0	0	0.8	\$7.25	\$5.80	
	SNAP participants	Advance letter and other participant recruitment	U; V; W	310	225	1	225	0.25	56.25	85	1	85	0.05	4.25	60.5	\$7.25	\$438.63	
	SNAP participants	Current and former participant phone interviews	L	225	200	1	200	0.50	100	25	1	25	0.05	1.25	101.25	\$7.25	\$734.06	
SNAP participant subtotal (unique)				328	243	1.8230	443	0.36	158.05	85	2	110	0.05	5.5	163.55	-	\$1,178.49	
TOTAL				460	375	1.6827	631	0.81	512.35	85	1.294	110	0.05	6	517.85		\$14,607.92	

State SNAP directors, E&T stakeholders, and UI agency DUA liaisons: average hourly earnings of workers in Management Occupations (11-0000): \$58.44

State and UI agency database administrators: Average hourly earnings of Database Administrators (15-1141): \$44.25

E&T provider and local SNAP office directors: Average hourly earnings of Social and Community Service Managers (11-9151): \$34.46

State E&T provider, local SNAP office, and business or other for-profit or nonprofit frontline staff: Average hourly earnings of Community and Social Service Specialists (21-10099): \$22.14

Individuals/SNAP participants: Federal minimum wage rate (\$7.25)

Sources: DOL BLS, n.d.; DOL WHD, n.d.

A.13. Estimates of Other Total Annual Cost Burden to Respondents or Recordkeepers

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 startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.

No capital, startup, or ongoing operational and maintenance costs are associated with this information collection.

A.14. Annualized Cost to 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 cost to the Federal government is \$846,129 over a 36-month period, or \$282,043 on an annualized basis. The largest cost to the Federal government is to pay a contractor \$839,257⁶ to conduct the study and deliver datafiles. The information collection also assumes that a total of 80 hours of Federal employee time per year: for a GS-15, step 1 in the Washington-DC locality, at \$64.59 per hour for a total of \$5,167.20 (or \$6,872.38 for fully loaded wages). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) effective January 2019.

A.15. Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new information collection that will add 517.85 burden hours (512.35 response hours plus 5.5 nonresponse hours) and 741 annual responses (631 responses for responsive participants plus 110 responses for nonresponsive participants) to the OMB information collection inventory.

⁶ The contractor costs include fully loaded wages because the contract is firm fixed price.

A.16. Plans for Tabulation and Publication and Project Time Schedule

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

The schedule for data collection, tabulation, and publication appears in table A.16.1.

Table A.16.1. Project Time Schedule

Activity	Activity Period	Weeks After OMB Clearance⁷
Develop and test data collection instruments	December 2018–April 2019	NA
Conduct data collection	May 2020–September 2020	4-24 weeks
Conduct data analysis and tabulations	March 2020–January 2021	1-40 weeks
Prepare draft and final reports for FNS	December 2020–May 2021	32-56 weeks
Conduct briefing at FNS	April 2021	52 weeks
Prepare datafiles and documentation	February 2021–May 2020	48-56 weeks

A.17. Reason(s) Display of OMB Expiration Date Is Inappropriate

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

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

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

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.

⁷ Assumes OMB clearance will be received March 31, 2020.

References

DOL BLS (U.S. Department of Labor, Bureau of Labor Statistics). (n.d.). *Occupational employment statistics: May 2018 national occupational employment and wage estimates United States* [Datasets]. Retrieved from https://www.bls.gov/oes/current/oes_nat.htm

[DOL WHD \(Wage and Hour Division\). \(n.d.\). Minimum wage \[Web page\]. Retrieved from https://www.dol.gov/WHD/minimumwage.htm](https://www.dol.gov/WHD/minimumwage.htm)

Rowe, G., Brown, E., & Estes, B. (2017). *SNAP employment and training (E&T) characteristics study: Final report*. Prepared by Mathematica Policy Research for U.S. Department of Agriculture, Food and Nutrition Service.