

# Supporting Statement Part A

OMB No. 0584-XXXX

## *Modernizing Channels of Communication With SNAP Participants*

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## Part A. Justification

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### A.1. Circumstances That Make Data Collection Necessary

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**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 in 2014 through Pub. L. 113-128 (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 act provides authority to FNS to conduct research to help improve the administration and effectiveness of SNAP (see appendix A: Legal Authority Statutes and Regulations).

In recent years, many State SNAP agencies have enhanced their use of mobile communication strategies (MCS) to allow SNAP participants to access information about SNAP and their cases, receive alerts and notifications, and perform certain case management functions. MCS fall into three primary categories: (1) text messaging (SMS), (2) mobile applications (apps), and (3) mobile-optimized websites. Given the proliferation of mobile devices—including among low-income populations—these MCS offer SNAP participants an alternative means of interacting with SNAP agencies from their locations and on their schedules. If designed and executed well, these tools and their supporting processes have the potential to improve client access and increase client satisfaction. States also stand to benefit from MCS. Participants' use of MCS for case inquiries and case management may reduce lobby traffic and call volume and may increase States' abilities to process applications in a timely manner.

According to a 2018 national scan of States' use of MCS for SNAP, most States and U.S. territories ( $n = 38$ ) had optimized their websites for mobile devices. Only a few States ( $n = 3$ ) had fully implemented a comprehensive MCS (fully operational mobile app, text messaging, and mobile-optimized websites). Some States had implemented mobile apps ( $n = 8$ ) or had apps under development ( $n = 7$ ). Some States had implemented text messaging ( $n = 15$ ) or had plans to

implement text messaging ( $n = 7$ ).<sup>1</sup> There is a lack of recent data on the characteristics of all State SNAP MCS and limited information available regarding clients' perspectives on how these tools affect their completion of the typical SNAP tasks. FNS is, therefore, requesting Office of Management and Budget (OMB) approval to collect information from a sample composed of participating State and local SNAP offices, (business-for-profit) community partners and potential software development contractors, and (individuals/household) SNAP participants and eligible applicants. FNS and its contractor Insight Policy Research, will profile SNAP MCS in five States via site visits.

## **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.**

The purpose of the data collection is to identify and highlight best practices and lessons learned from various MCS implemented in State SNAP agencies. This examination will help FNS and States improve communication and identify practices that lead to improved program outcomes.

FNS has identified four study objectives for this project. The first objective (the 2018 national scan of States' use of MCS for SNAP) presents the landscape of mobile technology use for SNAP across the Nation and provides a basis for selecting the MCS case study States. The second and third objectives, which are the focus of this information collection request, are descriptive and will provide FNS with an understanding of the State processes, challenges, and distinct features of mobile technologies and the clients' experiences with these technologies. The fourth objective will summarize the best practices and lessons learned for States that choose to implement MCS moving forward.

To meet these study objectives, FNS will gather data through site visits to five States implementing MCS. The States will be chosen by FNS to reflect variation in the available MCS, geographic diversity, and variation in the number of participants served through SNAP. State

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<sup>1</sup> See the memorandum "Task 2.1: National Scan of States' Use of Mobile Communication Strategies (MCS) To Enhance SNAP Participant Experiences"

agencies will be recruited through email outreach from their associated FNS regional office which will offer the State a voluntary opportunity to participate in the study (see Appendices Y: Case Study Site Recruitment Email to States from Research Team, Z: Template Recruitment Email from Regional Office to Case Study Site, and AA: Project Overview for Case Study Site Recruitment). As needed, the State agencies will participate in follow-up telephone conversations with the study team to assess their willingness and ability to support the site visit activities. The site visits will include semi-structured interviews and focus groups in English based around a conceptual framework of potential MCS functions (see appendix M: Conceptual Framework for MCS Functions Diagram.)

Advance materials to initiate the site visits will be sent approximately 1-2 weeks after receiving OMB clearance (see Appendix AC: Advance Materials for Confirmed Case Study Sites). To ensure sufficient time for focus group participant recruitments which will not begin until OMB clearance is received, the site visits will begin approximately 4 weeks after receiving clearance. In each of the five case study States, the study team will interview State government staff, including the State SNAP director (see Appendix E: State SNAP Director Interview Protocol); State MCS leads (see appendix G: State MCS Staff and Administrators Interview Protocol); software developers or IT staff (see appendix H: Business Software Developers Interview Protocol); local government staff, including local SNAP office staff (see appendix I: Local Office Frontline Staff Group Interview Protocol); businesses, including software developers or IT staff from for-profit businesses (see appendix H: Business Software Developers Interview Protocol); and community partners from not-for-profit businesses (see appendix J: Business Not-for-Profit Community Partners Interview Protocol). The study team will also conduct focus groups in English with individuals/households, including SNAP participants/MCS users (see appendix K: SNAP Participants Focus Group Protocol) and brief interviews with SNAP-eligible individuals (see appendix L: SNAP Office Waiting Room Questionnaire). Audiences will include the following:

- ▶ **State SNAP directors.** Of the six total SNAP directors contacted, five will each go on to participate in one 60-minute in-person interview each. These interviews (total of up to five

60-minute interviews, Appendix E) will assess the experiences the State SNAP director had while implementing MCS in order to understand the challenges and barriers to implementation.

- ▶ **State MCS Staff.** As described below, state MCS leads will participate in a 60-minute introductory telephone interview. These MCS leads, who will be joined by other staff involved in the MCS implementation, will go on to participate in a 90-minute in-person interview later in the study.
- ▶ **State MCS leads.** Of the 15 State MCS leads sent advance materials, 10 will go on to participate in one 60-minute telephone interview each. This initial set of introductory telephone interviews (total of up to 10 interviews of 60 minutes each, Appendix F) will confirm the components and functions of each State's MCS. Next, the 10 State MCS leads will receive advance materials to coordinate in-person the interviews. The 10 State MCS leads will go on to participate in one 90-minute in-person interview each. The in-person follow-up interviews (total of up to 10 interviews 90 minutes each, Appendix G) will confirm the stakeholders involved in the MCS implementation process, address the experiences the staff responsible for running the MCS had while implementing the tools, and foster understanding of the challenges and barriers to implementation.
- ▶ **Other State staff involved in MCS implementation.** Of the 20 other State staff involved in MCS implementation sent advance materials, 15 will go on to participate in one 90-minute in-person interview each. The in-person interviews (total of up to 15 interviews of 90 minutes each, Appendix G) will confirm the stakeholders involved in the MCS implementation process, address the experiences the staff responsible for running the MCS had while implementing the tools, and foster understanding of the challenges and barriers to implementation.
- ▶ **Local SNAP office staff.** Of the 25 local office staff contacted, 20 will go on to participate in 60-minute in-person group interviews. These small group interviews (total of up to 20 staff will be interviewed during 60 minutes discussions, Appendix I) will assess frontline staff awareness of and perspectives on the MCS. It will also assess what training, if any, the staff

members have had on MCS, the impact it has had on their workloads, and high-level feedback about the MCS that staff have received from clients.

▶ **Software developers or IT staff at the State SNAP office.** Of the six software developers or IT staff at the State SNAP offices contacted, five will go on to participate in one 60-minute interview each. These interviews (total of up to five interviews of 60 minutes each, Appendix H) will assess the history and timeline of the project's rollout, scope and goal of the project, and functional components of the strategies. It will also address the integration of the project into existing State systems.

▶ **Community partners from not-for-profit businesses.** Of the 20 community partners contacted, 15 will go on to participate in one 60-minute interview each. These interviews (total of up to 15 interviews of 60 minutes each, Appendix J) will assess the role other stakeholders and community partners played in the development, testing, and promotion of the MCS.

▶ **Software developers or IT staff from for-profit businesses.** Of the 10 software developers or IT staff from for-profit businesses, five will go on to participate in one 60-minute interview each. Similar to those for the State software developers, these interviews (total of up to five interviews of 60 minutes each, Appendix H) will assess the history and timeline of the project's rollout, the scope and goal of the project, and the functional components of the strategies. It will also address the integration of the project into existing State systems.

▶ **Individual SNAP participants who have used MCS.** Of the 166 individual SNAP participants who have used MCS who receive recruitment materials and screened for eligibility (Appendix N), 120 will be eligible and will be sent reminders, and 90 will go on to participate in 90-minute in-person focus groups. The goal of these focus groups (up to 10 focus groups of 90 minutes including up to 9 participants each with approximately 90 total participants, Appendices K and O) will be to assess the usability of and client satisfaction with the MCS.

▶ **Individual eligible SNAP office waiting room visitors.** Of the 170 SNAP eligible individuals who are approached, 120 will participate in in-person recruitment. Of the 120 who



participate in in-person recruitment, 100 will go on to complete the waiting room questionnaire. These brief intercept interviews (total of up to 100 interviews of 5 minutes each, Appendix L) will aim to assess the awareness and perceptions of MCS usefulness among eligible SNAP applicants.

Data from the interviews will be analyzed and compiled into the following reports for FNS: five individual case study reports; a focus group report addressing participant experiences with MCS and suggestions for improvements across States; and a final report compiling best practices and lessons learned across States. The data collection activities for this study will be conducted from fall 2020 through winter 2021.

### **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 strives to comply with the E-Government Act of 2002 (Pub. L. 107-347, 44 U.S.C. Ch 36). The FNS research team describes 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.

Data collected during the site visits will not employ information technology. Although an initial interview with State MCS staff and administrators will be conducted via telephone (Appendix F), all other data will be collected in person by trained and experienced researchers conducting interviews using semi-structured protocols ( Appendices G through O). Interviews will be audio recorded with the permission of respondents (Appendices Q through S) using digital voice recorders to aid in note-taking. The interviews and focus groups will take place at locations that are convenient to the respondents to minimize burden (e.g., local SNAP offices, State SNAP offices). Focus group participants will be screened for eligibility by local SNAP offices either in person or via telephone (Appendix N). Because of the small scale of this information collection

and the fact that it will be spread across five disparate States, in-person interviews and group discussions are the more efficient means of collection.

#### **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 data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. FNS has determined that no comprehensive efforts have been made to interview State or local SNAP staff or participants to assess their experiences implementing or using MCS.

#### **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.**

There may be some small entities involved in this data collection. Although small business or entities are not specifically targeted in this data collection, some of the interviewees could be employees of small businesses or not-for-profit organizations that are involved in implementing MCS within States. As such, the study must include these organizations. The interview protocols for software developers or IT staff from for-profit businesses and community partners from not-for-profit businesses (see appendices H: Software Developers Interview Protocol and J: Other Stakeholders or Community Partners Interview Protocol) have been designed to impose minimal burden on participating businesses and organizations. The interviews will request the minimum amount of information required for the intended use. FNS estimates that of the businesses to be interviewed for this study, approximately 25 percent or 10 out of 40 business are considered small businesses.

## **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, USDA FNS will have a limited understanding of the State processes, challenges, and distinct features of mobile technologies and the clients' experiences with these technologies. With the expansion of MCS across multiple sectors, including SNAP functions, it is critical for FNS to have a detailed and granular understanding of how MCS does or does not improve client access, increase client satisfaction, reduce lobby traffic and call volume, and increase States' abilities to process applications in a timely manner. The best practices and lessons learned from this research will help other States in the economical and efficient development or modification of their own MCS programs.

## **A.7. Special Circumstances Relating to the Guideline of 5 C.F.R. § 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 USDA FNS to conduct this information collection in a manner inconsistent with 5 C.F.R. § 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 July 2, 2019 (Volume 84, Number 31573, Pages 31573-31577). The period for comments closes September 3, 2019. FNS received two comments for this proposed information collection. The comments and FNS responses to the comments appear in Appendices U and V.

### ***Consultations Outside the Agency***

FNS consulted with a mathematical statistician from USDA’s National Agricultural Statistics Service (NASS), who reviewed the study methodology and procedures. The study team also pretested each data collection instrument with respondents from Maryland and New York (see appendix C: Pretest Methods and Summary of Findings). See table A.8.1 for a list of these individuals consulted outside the agencies. As a result of these pretests, the number of questions in several instruments were reduced to ensure completion within the allotted timeframe for each interview. In other instruments, clarifying language was added to several sections to ensure participants had a clear understanding of the questions. Appendix C: Pretest Methods and Summary of Findings outlines all changes made to the instruments as a result of the pretests.

**Table A.8.1. Individuals Consulted Outside the Agency**

Name	Title	Organizational Affiliation	Contact Information
Netsanet Kibret	Executive Director	Family Investment Administration Maryland Department of Human Services	netsanet.kibret@maryland.gov
La Sherra Ayala	Deputy Executive Director of Operations	Family Investment Administration Maryland Department of Human Services	(410) 767-7190 lasherra.ayala@maryland.gov
Sandy Washington	Executive Director	LifeStyles of Maryland	(301) 609-9900 <a href="mailto:Swashington@lifestylesofmd.org">Swashington@lifestylesofmd.org</a>

### **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.**

It is common practice to provide SNAP participants/MCS users who participate in one of the focus groups a \$45 Mastercard, Visa, American Express, or Visa gift card as a token of appreciation in recognition and can be used to offset child care or travel costs. The cards will be given to the respondents in-person following the focus group. To ensure the focus group discussions start and end on time, participants who arrive at least 10 minutes early will be eligible to receive an additional \$10 Mastercard, Visa, American Express, or Visa gift card token of appreciation, which will be given at the end of the focus group (one \$10 Mastercard, Visa, American Express, or Visa gift card per group).

SNAP-eligible individuals who participate in the waiting room questionnaire will be randomly selected to receive a \$10 Mastercard, Visa, American Express, or Visa gift card; two cards will be given each day. The gift cards will be administered in-person.

No token of appreciation will be provided to State staff, business software developers, or community partners who participate in the semi-structured interviews. The incentive (Appendix D – Use of Incentives) amount is consistent with that provided in other studies of persons participating in food assistance programs.

## **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 (Pub. L. 93-579, 5 U.S.C. § 552a), 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. Personally identifiable data will not be entered into the analysis file, and data records will contain a numeric identifier only. 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 April 25, 1991 (56 Fed. Reg. 19078), and (2) USDA/FNS-10 Persons Doing Business with the Food and Nutrition Service, published in the Federal Register March 31, 2000 (65 Fed. Reg. 17251). Study respondents will be notified the information they provide will not be released 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 or any other researchers. The identities of SNAP participants, stakeholder organizations, and staff from State and local SNAP offices will not be disclosed. As part of the data collection process, all interview and focus group participants will be asked for their written consent to participate in the study and informed that participation is voluntary and will in no way affect their benefits or employment, nor will any information provided be released except as otherwise required by law (see appendices P: Consent Form for Stakeholder Interviews, Q: Consent Form for Waiting Room Questionnaire Participants, R: Consent Form for Focus Group With SNAP Participants, S: Consent Form for Stakeholder Interviewees (60 Minutes), and T: Consent Form for Stakeholder Interviewees (90 Minutes).

For reporting of results, participant data will be presented only in aggregate form so that individuals will not be identified. A statement to this effect will be included with all requests for data. All members of the study team with access to the data will be trained on the importance of privacy and data security. All data will be kept in secured locations. Identifiers will be destroyed at the conclusion of this study.

FNS staff will never handle or see any of the personal data collected, and Insight Policy Research's systems do not tie into any of FNS's data management and analysis systems.

As FNS's contractors, Insight Policy Research 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.

All Insight Policy Research employees associated with data collection and analysis have provided assurances to the above safeguards in the confidentiality pledge (see appendix U: 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.**

This new information collection will have 444 respondents (72 State and local government staff, 10 for-profit organization staff, 21 not-for-profit staff [staff from community partners], 169 SNAP participants that are MCS users, and 172 SNAP office waiting room visitors). It is anticipated that

of the 444 contacted, 326 will be responsive, and 118 will be nonresponsive. The burden estimates for respondents are shown in table A.12.1. The estimated annual burden is 333.70 hours (312.81 hours for responsive participants and 21.08 hours for nonresponsive participants). The estimated time of response varies from 0.03 hours to 1.5 hours depending on respondent group and activity. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping or third-party disclosure. Table A.12.1 and the accompanying burden table in Excel format provide more detailed information about the burden and annualized costs to respondents for this collection.



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

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual Burden Estimate (Hours)	
				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)		
<i>State, local, and tribal government</i>															
<b>State government</b>	State SNAP director	Appendices Y, Z, and AA. Email recruitment materials for case study participation	6.0	5.0	1.0	5.0	0.033	0.17	1.0	1.0	1.0	0.033	0.03	0.2	
	State SNAP director	Question and answer phone call with FNS research team	6.0	5.0	1.0	5.0	0.50	0.50	1.0	1.0	1.0	0.50	0.50	1.0	
	State SNAP director	Internal state conversations surrounding case study participation	6.0	5.0	1.0	5.0	0.50	0.50	1.0	1.0	1.0	0.50	0.50	1.0	
	State SNAP director	Appendix AB. Case Study Confirmation Email	5.0	5.0	1.0	5.0	0.033	0.17	0.0	0.0	0.0	0.000	0.00	0.0	
	State SNAP director	Appendix AC. Advance materials and preparation for interviews, including scheduling calls and reminders	5.0	5.0	1.0	5.0	0.25	1.25	0.0	0.0	0.0	0.25	0.00	1.3	
	State SNAP director	Appendices E and R. In-person semi-structured interview protocol and consent form	5.0	5.0	1.0	5.0	1.00	5.00	0.0	0.0	0.0	0.00	0.00	5.0	
	State SNAP director	Follow-up email	5.0	5.0	1.0	5.0	0.03	0.17	0.0	0.0	0.0	0.00	0.00	0.2	
	Subtotal for State SNAP director			6.0	5.0	7.0	35.0	0.22	7.75	1.0	1.0	1.0	1.03	1.03	8.6

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual 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)	
<i>State government (continued)</i>	State MCS leads	Internal state conversations surrounding case study participation	6.0	5.0	1.0	5.0	0.50	0.50	1.0	1.0	1.0	0.50	0.50	1.0
	State MCS leads	Pre-test of advance materials and preparation for introductory interview, including scheduling calls and reminders	2.0	2.0	1.0	2.0	0.25	0.50	0.0	0.0	0.0	0.00	0.00	0.5
	State MCS leads	Appendix AC. Advance materials and preparation for introductory interview, including scheduling calls and reminders	15.0	10.0	1.0	10.0	0.25	2.50	5.0	1.0	5.0	0.25	1.25	3.8
	State MCS leads	Pre-test of introductory call with State staff interview protocol	2.0	2.0	1.0	2.0	1.00	2.00	0.0	0.0	0.0	0.00	0.00	2.0
	State MCS leads	Appendices F and R. Introductory call with State staff interview protocol and consent form	10.0	10.0	1.0	10.0	1.00	10.00	0.0	0.0	0.0	0.00	0.00	10.0
	State MCS leads	Follow-up email	10.0	10.0	1	10.0	0.03	0.33	0.0	0.0	0.0	0.00	0.00	0.3
	State MCS leads and other staff involved in MCS implementation	Advance materials and preparation for in-person interview, including scheduling calls and reminders	30.0	25.0	1.0	25.0	0.25	6.25	5.0	1.0	5.0	0.25	1.25	7.5

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual Burden (Hours)	
				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)		
<b>State government (continued)</b>	State MCS leads and other staff involved in MCS implementation	Pre-test of in-person semi-structured interview protocol	2.0	2.0	1.0	2.0	1.50	3.00	0.0	0.0	0.0	0.00	0.00	3.0	
	State MCS leads and other staff involved in MCS implementation	Appendices G and S. In-person semi-structured interview protocol and consent form	25.0	25.0	1.0	25.0	1.50	37.50	0.0	0.0	0.0	0.00	0.00	37.5	
	State MCS leads and other staff involved in MCS implementation	Follow-up email	25.0	25.0	1	25.0	0.03	0.83	0.0	0.0	0.0	0.00	0.00	0.8	
	Subtotal for State staff involved in MCS implementation			32.0	27.0	4.3	116.0	0.55	63.42	5.0	2.0	10.0	0.30	3.00	66.4
	Business Software developers or IT staff	Pre-test of advance materials and preparation for interview, including scheduling calls and reminders	1.0	1.0	1.0	1.0	0.25	0.25	0.0	0.0	0.0	0.00	0.00	0.3	
	Business Software developers or IT staff	Advance materials and preparation for interview, including scheduling calls and reminders	6.0	5.0	1.0	5.0	0.25	1.25	1.0	1.0	1.0	0.25	0.25	1.5	
	Business Software developers or IT staff	Pre-test of in-person semi-structured interview protocol	1.0	1.0	1.0	1.0	1.00	1.00	0.0	0.0	0.0	0.00	0.00	1.0	
<b>State government (continued)</b>	Business Software developers or IT staff	Appendices H and R. In-person semi-structured interview protocol and consent form	5.0	5.0	1.0	5.0	1.00	5.00	0.0	0.0	0.0	0.00	0.00	5.0	
	Business Software developers or IT staff	Follow-up email	5.0	5.0	1.0	5.0	0.03	0.17	0.0	0.0	0.0	0.00	0.00	0.2	

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual 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)	
<b>Local government</b>	Subtotal for software developers or IT staff		7.0	6.0	2.8	17.0	0.45	7.67	1.0	1.0	1.0	0.25	0.25	7.9
	Local SNAP office staff	Pre-test of advance materials and preparation for group interview, including scheduling calls and reminders	2.0	2.0	1.0	2.0	0.25	0.50	0.0	0.0	0.0	0.00	0.00	0.5
	Local SNAP office staff	Advance materials and preparation for group interview, including scheduling calls and reminders	25.0	20.0	1.0	20.0	0.25	5.00	5.0	1.0	5.0	0.25	1.25	6.3
	Local SNAP office staff	Pre-test of in-person semi-structured group interview protocol	2.0	2.0	1.0	2.0	1.00	2.00	0.0	0.0	0.0	0.00	0.00	2.0
	Local SNAP office staff	Appendices I and R. In-person semi-structured group interview protocol and consent form	20.0	20.0	1.0	20.0	1.00	20.00	0.0	0.0	0.0	0.00	0.00	20.0
	Local SNAP office staff	Follow-up email	20.0	20.0	1.0	20.0	0.03	0.67	0.0	0.0	0.0	0.00	0.00	0.7
	Subtotal for local SNAP office staff		27.0	22.0	2.9	64.0	0.44	28.17	5.0	1.0	5.0	0.25	1.25	29.4
	State and local government subtotal			72.0	60.0	3.867	232.0	0.46	107.00	12.00	1.42	17.00	1.83	5.53
<b>Businesses</b>														
<b>Business For-Profit</b>	Software developers or IT staff	Advance materials and preparation for interview, including scheduling calls and reminders	10.0	5.0	1.0	5.0	0.25	1.25	5.0	1.0	5.0	0.25	1.25	2.5

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual 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)		
	Software developers or IT staff	Appendices H and R. In-person semi-structured interview protocol and consent form	5.0	5.0	1.0	5.0	1.00	5.00	0.0	0.0	0.0	0.00	0.00	5.0	
	Software developers or IT staff	Follow-up email	5.0	5.0	1.0	5.0	0.03	0.17	0.0	0.0	0.0	0.00	0.00	0.2	
	Subtotal for for-profit businesses			10.0	5.0	3.0	15.0	0.43	6.42	5.0	1.0	5.0	0.25	1.25	7.7
<b>Business Not-For-Profit</b>	Community partners	Pre-test of advance materials and preparation for interview, including scheduling calls and reminders	1.0	1.0	1.0	1.0	0.25	0.25	0.0	0.0	0.0	0.00	0.00	0.3	
	Community partners	Advance materials and preparation for interview, including scheduling calls and reminders	20.0	15.0	1.0	15.0	0.25	3.75	5.0	1.0	5.0	0.25	1.25	5.0	
	Community partners	Pre-test of in-person semi-structured interview protocol	1.0	1.0	1.0	1.0	1.00	1.00	0.0	0.0	0.0	0.00	0.00	1.0	
<b>Business Not-For-Profit (continued)</b>	Community partners	Appendices J and R. In-person semi-structured interview protocol and consent form	15.0	15.0	1.0	15.0	1.00	15.00	0.0	0.0	0.0	0.00	0.00	15.0	
	Community partners	Follow-up email	15.0	15.0	1.0	15.0	0.03	0.50	0.0	0.0	0.0	0.00	0.00	0.5	
	Subtotal for Not-for-profit businesses			21.0	16.0	2.938	47.0	0.44	20.50	5.0	1.0	5.0	0.25	1.25	21.8
Business subtotal			31.0	21.0	2.952	62.0	0.434	26.917	10.0	1.0	10.0	0.50	2.50	29.4	
<b>Individuals/Households</b>															

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual Burden (Hours)
				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)	
<b>SNAP Participants MCS Users</b>	SNAP participants/ MCS users	Pre-test of recruitment materials	3.0	3.0	1.0	3.0	0.03	0.09	0.0	0.0	0.0	0.03	0.00	0.1
	SNAP participants/ MCS users	Recruitment materials	166.0	120.0	1.0	120.0	0.03	3.60	46.0	1.0	46.0	0.03	1.38	5.0
	SNAP participants/ MCS users	Pre-test of eligibility screener	3.0	3.0	1.0	3.0	0.17	0.51	0.0	0.0	0.0	0.17	0.00	0.5
	SNAP participants/ MCS users	Appendix N. Eligibility screener	166.0	120.0	1.0	120.0	0.17	20.00	46.0	1.0	46.0	0.17	7.67	27.7
	Eligible SNAP participants/MCS users	Reminders	120.0	90.0	1.0	90.0	0.03	2.70	30.0	1.0	30.0	0.03	0.90	3.6
	Eligible SNAP participants/ MCS users	Appendices K, Q, O, and M. In-person focus group protocol, consent form, demographic questionnaire, and conceptual framework	90.0	90.0	1.0	90.0	1.50	135.00	0.0	0.0	0.0	0.00	0.00	135.0
<b>SNAP Participants MCS Users (continued)</b>	Eligible SNAP participants/ MCS users	Pre-test of in-person focus group protocol, consent form, demographic questionnaire	3.0	3.0	1.0	3.0	1.50	4.50	0.0	0.0	0.0	0.00	0.00	4.5
<b>SNAP Eligible Individuals</b>	SNAP participants/MCS users subtotal		169.0	123.0	3.5	429.0	0.39	166.40	46.0	2.7	122.0	0.08	9.95	176.3
	SNAP eligible in Local office waiting room visitors/MCS nonusers	In-person recruitment to participate	170.0	120.0	1.0	120.0	0.03	4.00	50.0	1.0	50.0	0.03	1.50	5.5

Respondent Category	Type of Respondents	Instruments and Activities	Sample Size	Responsive					Nonresponsive					Grand Total Annual 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)	
	SNAP Eligible in Local SNAP office waiting room visitors/MCS nonusers	Pre-test of waiting room questionnaire	2.0	2.0	1.0	2.0	0.08	0.16	0.0	0.0	0.0	0.00	0.00	0.2
	SNAP Eligible in Local SNAP office waiting room visitors/MCS nonusers	Appendices L and P. Waiting room questionnaire and consent form	120.0	100.0	1.0	100.0	0.08	8.33	20.0	1.0	20.0	0.08	1.60	9.9
	SNAP eligible subtotal		172.0	122.0	1.8	222.0	0.06	12.49	50.0	1.4	70.0	0.04	3.10	15.6
Individuals subtotal			341.0	245	2.657	651.0	0.27	178.89	96.0	2.0	192.0	0.07	13.05	191.9
	<b>TOTAL</b>		<b>444.0</b>	<b>326.0</b>	<b>2.9</b>	<b>945.0</b>	<b>0.33</b>	<b>312.81</b>	<b>118.0</b>	<b>1.9</b>	<b>219.0</b>	<b>0.10</b>	<b>21.08</b>	<b>333.7</b>

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

The estimate total annual cost to respondents with fully-loaded wages is \$8,200.75 (\$6,165.98 base cost + \$2,034.77 fringe benefits) which uses 0.33 percent to account for fully-loaded wages.

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.

The wage rates were estimated based on the most recently available national occupational employment and wage data from the U.S. Department of Labor's Bureau of Labor Statistics (DOL BLS).<sup>2</sup> The wage rate of State SNAP directors (\$58.44) is the average hourly wage of workers in management occupations and staff involved in MCS (\$34.46) is the average hourly wage of workers in social and community service management occupations. The wage rate of State software developers is the average hourly wage of software developers for applications (\$51.96). The wage rate of local SNAP office staff is the average hourly wage of eligibility interviewers for government programs (\$22.34). The wage rate of for-profit business software developers is the average hourly wage of software developers for applications (\$51.96). The wage rate of community partners is the average hourly wage of workers in community and social service occupations (\$23.69). The wage rate of individuals is the Federal minimum wage, \$7.25 an hour.<sup>3</sup> Wage rates were determined using the following website: <http://www.bls.gov/bls/blswage.htm>.

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<sup>2</sup> For wage rates, see DOL BLS. (n.d.). *May 2018 national occupational employment and wage estimates United States* [Dataset]. Retrieved from [https://www.bls.gov/oes/current/oes\\_nat.htm](https://www.bls.gov/oes/current/oes_nat.htm)

<sup>3</sup> For Federal minimum wage information, see DOL, Wage and Hour Division. (n.d.). Minimum wage [Web page]. Retrieved from <https://www.dol.gov/WHD/minimumwage.htm>



### **A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

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**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 or startup or ongoing operational and maintenance costs are associated with this information collection.

### **A.14. Annualized Cost to Federal Government**

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**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 estimated overall annual total cost to the Federal Government is **\$216,772.18** (include **\$135,579.67** annual contract cost plus **\$81,192.51** annual Federal Staff cost including fringe benefits).

The annual cost for a three-year contract is **\$135,579.67** with fully loaded wages. The contract cost to the Federal Government is a fixed price award is valued at \$406,739. This total is based on the contractor's fully-loaded labor rates including salaries and fringe benefits. It 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 contract cost (\$406,739), approximately \$224,311 will be used for data collection and analysis. This includes \$30,751 for the development of data collection instruments; \$110,794 for collection, cleaning and analysis of case study data; \$16,184 for training data collectors; and \$66,582 for conducting focus groups with study participants. Travel costs will not exceed \$11,840.

The estimated annual cost for Federal Government Staff with fully-loaded wages is **\$81,192.51**. This information collection assumes the estimated annual base cost of FNS employees which is

estimated to be **\$61,047 + \$20,145.51** fringe benefits, we used 33 percent of base cost to determine fully loaded wages. This cost was calculated as follows:

- ▶ The FNS employee, Social Science Policy Analyst, involved in project oversight which is estimated at GS-13, step 2 at \$49.10 per hour based on 2,080 hours per year. The FNS research team anticipates this person will work 260 hours per year for 3 years for a combined total of 780 hours. The total cost for the FNS Social Science Analyst is \$38,298.
- ▶ The FNS employee, Program Analyst, involved in providing expert subject matter guidance to the project which is estimated at GS-13, step 2 at \$49.10 per hour based on 2,080 hours per year. The FNS research team anticipates 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 \$8,838.
- ▶ The FNS employee, Branch Chief, involved in project oversight with the study is estimated at GS-14, Step 6 at \$65.51 per hour based on 2,080 hours per year. The FNS research team anticipates this person will work 52 hours per year for 3 years for a combined total of 156 hours. The total cost for the FNS Branch Chief is \$10,219.
- ▶ The FNS employees, Regional Office SNAP Directors (7), involved in recruiting States for the study is estimated at GS - 13, Step 8 at \$58.61 per hour based on 2080 hours per year. The FNS research team anticipate these persons will work 3 hours per year for 3 years for a combined total of 63 hours. The total cost for the Regional Office SNAP Directors is \$3,692.

Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2019 for the Washington, DC, locality.

### **A.15. Plans for Tabulation and Publication and Project Time Schedule**

**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 333.70 total burden hours to the OMB information collection inventory.

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

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

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

*Table A.16.1. Project Time Schedule*

<b>Activity</b>	<b>Activity Period</b>	<b>Weeks After OMB Clearance</b>
Distribution of recruitment materials	1 week after OMB's approval	1-3
Data collection activities and analysis	September 2020–March 2021	0–24
Delivery of draft reports to FNS	March 2021–August 2021	24–29
Approval of final reports to FNS	September 2021	30

### **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 83-1.