**Survey of SNAP and Work**

**OMB Supporting Statement 0584-NEW**

**Paperwork Reduction Act of 1995**

**Part A. Justification**

**September 28, 2020**

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# A.1 Circumstances That Make the Collection of Information 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 Supplemental Nutrition Assistance (SNAP) is the largest of the nutrition assistance programs administered by the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS). It is the cornerstone of nutrition assistance in the U.S. and the primary policy mechanism to provide a nutrition safety net. It reduces food insecurity among low-income Americans by increasing access to foods that are part of a healthy diet. The assistance comes in the form of electronic benefit transfer (EBT) cards, used to purchase food in authorized food retailers. In Fiscal Year (FY) 2018, SNAP served 39.6 million people with an average monthly benefit of $126.96 per person.[[1]](#footnote-2) The Food and Nutrition Act of 2008, as amended through P.L. 116-94, Enacted December 20, 2019, provides the legislative authority for the USDA’s FNS to administer 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 (Appendix A).

About one-third of SNAP households have earnings from employment.[[2]](#footnote-3) However, we know few details about current job characteristics and work histories of adults participating in SNAP. In order to gain a better understanding of current and past workforce participation characteristics among nondisabled adult SNAP participants, FNS will conduct the *Survey of SNAP and Work*. Through a national survey of nondisabled[[3]](#footnote-4) current SNAP participants aged 18 to 69, information on employment status, length of workforce detachment, types of job held, education and training, and social, physical, and environmental barriers to work will be collected. The survey will provide data for calculating both national and State-level estimates. FNS seeks OMB clearance for the survey data collection that will begin in January 2021. Appendix B provides detailed background information for this survey.

# 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 Survey of SNAP and Work is to provide FNS and State SNAP agencies with information about the employment patterns and characteristics of nondisabled adult SNAP participants, information not currently collected in the Annual Social and Economic Supplement (ASEC) to the Current Population Survey (CPS) or other available data sets. In addition, the Survey of SNAP and Work will identify health, social, and personal factors that promote or inhibit employment among SNAP participants. Specifically, the six study objectives are:

* **Objective 1:** Produce descriptive statistics on sociodemographic and economic characteristics.
* **Objective 2**: Produce descriptive statistics on employment status and employment characteristics.
* **Objective 3**: Produce descriptive statistics on length of detachment from the workforce.
* **Objective 4**: Produce descriptive statistics on education and training.
* **Objective 5**: Produce descriptive statistics on health, social, and personal factors related to employment.
* **Objective 6**: Examine the individual associations between key characteristics and employment status adjusted for other relevant characteristics.

In the current policy environment, national- and State-level estimates are particularly important. On a local level, the ability to transition nondisabled adult SNAP recipients into work depends, in part, on local policy choices and budget resources, the nature of accessible E&T services, local barriers, and—perhaps most important—the local work environment. While national estimates can yield valuable policy insights, State-level estimates are likely to provide both policy and operational insight to the challenges and opportunities for transitioning recipients into employment.

This survey occurs in the context of expiring waivers on ABAWD (able-bodied adult without dependents) time limits in many States. The survey will provide information on the extent to which SNAP participants face challenges that interfere with compliance with work requirements or participation in training programs, and ultimately, obtaining and retaining jobs. By seeking to understand the employability of SNAP participants, this study will provide information about individuals vulnerable to losing SNAP benefits due to weak connection to the labor market. The results of this study can be used by SNAP E&T administrators to design programs that are tailored to the specific work histories and barriers faced by SNAP participants in their local environments.

There are two categories of individuals from whom we will collect data: State SNAP agency staff and SNAP participants.

* **State SNAP Agency Staff.** We will request SNAP administrative caseload files from State agencies to use in the building of a sampling frame of SNAP participants. The SNAP administrative data will include names, contact information and available household and demographic characteristics for individuals receiving SNAP benefits in the reference month FNS will send an email to the State agencies (Appendix C) along with a fact sheet (Appendix D) to introduce the survey and request their cooperation in providing State administrative data for sampling purposes. SNAP administrative data file for your State can be uploaded to a secure server at [<https://securetransfer2.westat.com>](mailto:secureserver@westat.com). The contractor will follow up with an email to request a telephone call to discuss the data request with the State agencies (Appendix E and F). One week after OMB approval, we will send SNAP State agencies an email requesting the delivery of the SNAP administrative data (Appendix G).
* **SNAP Participants.** We will select a stratified random sample of SNAP participants from every State and the District of Columbia for the Survey of SNAP and Work. Within three weeks of receiving OMB clearance, we will send an invitation letter (Appendix H-1 and H-2) and a brochure about the study (Appendix I-1 and I-2) to each sampled participant with a $2 cash pre-incentive. The letter will invite the participant to complete the survey online (in English or Spanish) using the URL at https://www.website forthcoming.com[[4]](#footnote-5) and a unique PIN number to access the survey via the web. We will provide a $20 cash incentive as a token of appreciation for completing the survey and an additional $20 if completed within the first four weeks of the sample release (i.e., an early-bird incentive). One week and two weeks after sample release, all non-responding SNAP participants will receive a reminder postcard (Appendix J-1 and JI-2). After four weeks, Computer-Assisted Telephone Interviewing (CATI) will be used to follow-up on remaining nonrespondents. By the eighth week after sample release, we will draw a 25% subsample of nonrespondents for field location and send a letter to the nonrespondents stating that a field data collector will come to their residence to discuss participation in the survey (Appendix K-1 and K-2). The field data collector will leave a Sorry I Missed You card if unable to reach the SNAP participant (Appendix L-1 and L-2). The field effort will end approximately 14 weeks after the sample release. We will mail a thank you letter with the cash incentive to participants completing the survey (Appendices M-1 through M-4). Appendix N provides a data collection flow diagram to illustrate the data collection process.

# 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.**

FNS is committed to complying with the E-Government Act of 2002 and will use information technology for data collection to reduce respondent burden. The Survey of SNAP and Work will begin with web-based administration (Appendix O-1—O-4). Computer-assisted telephone interviewing (CATI) will follow among the web non-respondents (Appendix O-5 and O-6). Field follow-up of a subsample of non-respondents will direct them to complete the survey via CATI or the web. Attachments O-1 through O-6 provide the web and CATI instruments, including screen shots of the web versions. These instruments were pretested with 30 participants under generic clearance number 0584-0606.

We will conduct the survey using a sequential multi-mode approach that begins with the most cost effective mode. Initially, we will invite participants to complete the web survey. Web surveys are low cost and less burdensome, as they offer easy access and submission, while also allowing participants to complete the survey at a time convenient to them and at their own pace. A web survey has the additional advantages of reducing the potential for errors by checking for logical consistency across answers, accepting only valid responses and enforcing automated skip patterns. We will provide the URL at <https://www.websiteforthcoming.com>[[5]](#footnote-6) and a unique PIN to access the survey in the invitation letter (Appendix H-1 and H-2). To increase the response rates, we will send reminder post cards to all non-respondents after 2 weeks and after 3 weeks from the release of the sample for survey administration (Appendix J-1 and J-2). After sending the two reminder post cards, CATI interviewers will attempt to contact all non-respondents and invite them to complete the survey by telephone (Appendix P-1 and P-2). If interviewers cannot reach participants by telephone, they will search for respondents using batch and individualized tracing. Starting around the eighth week, field recruitment staff will attempt to locate non-respondents to encourage them to complete the survey via CATI or the web (Appendix Q-1 and Q-2). Therefore, FNS estimates approximately 22.9 percent of the responses will be electronically submitted via a web-based or CATI system (and 100 percent of State agency responses will be electronically uploaded via secure data transfer).

# A.4 Efforts to Identify of 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 duplication with other data collection efforts. The survey asks questions about the employment situation and characteristics of SNAP participants that is not available in administrative data or in the Annual Social and Economic Supplement (ASEC) to the Current Population Survey (CPS).

# 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.**

The data collection—survey of SNAP recipients—does not involve small businesses or small entities. It will have no an adverse impact on small businesses or other small entities.

FNS will ask State SNAP agencies to provide one month of data about their SNAP caseloads to use in developing the sampling frame for the survey.

# A.6 Consequence 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 voluntary one-time data collection activity. Without this collection, FNS will not obtain information about the employment patterns and characteristics of nondisabled adult SNAP participants and about the health, social, and personal factors that promote or inhibit employment among these SNAP participants. We need the survey data to develop national and State-level estimates that will provide both policy and operational insight to the challenges and opportunities for transitioning SNAP recipients into employment.

# A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320

**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 surveys, 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.**

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

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

**If applicable, 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.**

##### **A.8.1 Federal Register Notice and Comments**

In accordance with 5 CFR 1320.8(d), FNS published a notice on Monday, September 30th, 2019, in the *Federal Register*, Volume 84, Number 189, pages 51508-51509, and provided a 60-day period for public comments, closing on November 29th, 2019. FNS received 10 public comments and all 10 were publicly posted on <https://www.regulations.gov>. We provide these comments (Appendices R1 through R10) and FNS’s responses to three of the comments deemed relevant to need, time, cost, and practical utility (Appendices R-6-C, R-9-B, and R-10-C).

##### **A.8.2 Consultations Outside the Agency**

In addition to the public input on the Notice, we consulted with a peer advisory panel (see Table A-1) during the study’s planning and design phase about the research design, sample design, data sources and needs, and study reports. Appendix X presents the panel’s comments and FNS responses. Lindsay Drunasky, Mathematical Statistician at the National Agricultural Statistics Service of USDA, also provided a review of the proposed data collection. Our response is provided in Appendix S.

Table A-1 . Peer Advisory Panel members from outside the agency

|  |  |  |
| --- | --- | --- |
| Name | Affiliation | Email Address |
| Benjamin Reist | Assistant Center Chief for Research, Center for Adaptive Design in Research and Methodology Directorate at U.S. Census Bureau | [Benjamin.M.Reist@census.gov](mailto:Benjamin.M.Reist@census.gov) |
| Dottie Rosenbaum | Senior Fellow, Center on Budget and Policy Priorities | [rosenbaum@cbpp.org](mailto:rosenbaum@cbpp.org) |
| Yvette Chocolaad | Policy Director, National Association of State Workforce Agencies | [ychocolaad@naswa.org](mailto:ychocolaad@naswa.org) |
| Diane Whitmore Schanzenbach | Director, Institute for Policy Research at Northwestern University;0 research associate at the National Bureau of Economic Research | [dws@northwestern.edu](mailto:dws@northwestern.edu) |
| Laura Tiehen | Economist, Food Assistance Branch of the Economic Research Service's Food Economics Division | [LTIEHEN@ers.usda.gov](mailto:LTIEHEN@ers.usda.gov) |

# 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.**

The Food and Nutrition Service (FNS) is requesting the use of pre-paid (pre-survey) and post-participation (survey completion) incentives to increase survey response rates, gain efficiency in data collection, and most importantly to reduce non-response bias. Providing survey participants with a monetary incentive reduces non-response bias and improves survey representativeness, especially in populations defined as being in poverty.[[6]](#footnote-7),[[7]](#footnote-8),[[8]](#footnote-9),[[9]](#footnote-10) [[10]](#footnote-11) Additionally, incentives improve survey response rates and therefore the numbers of surveys completed. Having an adequate number of completed surveys is essential to obtaining reliable estimates, especially at the state-level. Incentives are an essential component of the multi-pronged approaches used to minimize non-response bias, especially in studies with hard-to-reach, low-income households such as those with children, elderly, and those residing in rural areas; receiving federal nutrition assistance benefits; [[11]](#footnote-12) reduce efforts to locate hard-to-reach study participants; and lower overall survey costs and time to achieve completion rates without affecting data quality.[[12]](#footnote-13),[[13]](#footnote-14)

Based on the empirical evidence summarized in Appendix T, Incentives and Response Rates, survey respondents will receive a pre-survey incentive of $2 with the invitation letter and post-participation/survey completion incentives of $40 for completing the survey in the first four weeks and $20 for completing the survey after that time. The monetary incentive serves as a token of our appreciation that can be used to offset any expenses such as cellular smartphone air time or any internet connectivity charges participants may incur.

# 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.**

We will provide assurances to study participants as provided by the Privacy Act of 1974 (5 USC Section 552a), which requires the safeguarding of individuals against invasion of privacy. We will assure the individuals participating in this study that we will not publish the information they provide in a form that identifies them and that there is no penalty if they decide not to respond to the data collection as a whole, or to any particular questions. We will not attach any identifying information to any reports. Identifying information will not be included in the public use dataset. In addition, all members of the study team will sign a confidentiality and nondisclosure agreement (Appendix U). We will ensure the privacy and security of electronic data during the data collection and processing period following the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports.[[14]](#footnote-15),[[15]](#footnote-16) We will not link names and phone numbers to participants’ responses. Survey respondents will have a unique ID number, and we will conduct the analysis on datasets that include only respondent ID numbers. We will use secure data transmission for all data to the study team via secure fax, File Transfer Protocol (FTP) site, tracked mail, or telephone. We will store data in locked file cabinets or password-protected computers, and accessible only to study team staff. We will destroy names and phone numbers within 12 months after the end of the data collection period. Westat’s Institutional Review Board (IRB) serves as the organization’s administrative body, and all research involving interactions or interventions with human subjects is within its purview (Appendix V).

# 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.**

The Survey of SNAP and Work includes questions that some participants may consider to be of a sensitive nature, such as those about receipt of Federal program benefits, race/ethnicity, earnings and income, and specific barriers to employment (e.g., past criminal record and health conditions). These questions of a sensitive nature are included in the surveys to obtain important information about the health, social, and personal factors related to SNAP participants’ employment experiences, key research objectives of the study. We will inform all respondents that they can choose not to answer any question they do not wish to answer and that there are no penalties for not participating, including loss of benefits. All respondents will be assured privacy, informed that the data will be securely stored, their responses will not be shared with others not involved in the study, except as otherwise required by law and all data will be aggregated in reports.

# A.12 Estimate of Annualized Burden Hours and 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.**

**A12.1. Estimated Total Burden**

With this submission, there is a total of 88,434 respondents and non-respondents. The affected public includes 51 State agencies and 88,383 individuals. FNS anticipates 100 percent participation of State agencies. There will be an estimated 502,460 responses (among 70,707 survey respondents, 17,676 survey non-respondents, and 51 State agencies). These responses include those who choose not to participate (known as non-participants). The total burden hours for the survey portion of this data collection is 38,350. The estimated number of responses per SNAP participant respondent is 5.68. The estimated number of responses per state SNAP agency is six. The estimated survey response time is 0.0768 hours per response. Taken together, the total annual burden hours is 38,569. The Burden Table (Appendix W) presents the number of respondents, frequency of response, and annual hour burden for SNAP recipients and for State SNAP agencies. The values in the “sample size” column reflect the number of sampled SNAP participants targeted to receive the particular instrument or activity. As participants respond, fewer need targeting for reminders and for field location. The increase in the sample size for the invitation letter and brochure reflects the expectation of locating individuals with bad initial contact information. The values in the “number of respondents” column are less than the sample size due to anticipated non-response, including some participants that will not be locatable. The table reflects about a 25-percent subsampling of non-respondents to the web and telephone in each State for field location. There is no recordkeeping or third party disclosure in this information collection request.

**A12.2. Estimated Cost of Burden**

The total and annual cost burden of collecting this information is $291,459. This cost represents the sum across the survey when we multiply the average hourly rate for each respondent category by the corresponding number of hours. The hourly wage rate of $7.25 for SNAP recipients is the Federal minimum wage rate according to the Department of Labor Wage and Hour Division.[[16]](#footnote-17) The hourly mean wage for functions performed by State agencies directors/managers is estimated at $58.88 per hour (occupation code 11-0000) and the hourly mean wage for State agency database administrators is estimated at $46.21 per hour (occupation code 15-1245). [[17]](#footnote-18) With a burden of 218 hours combined, the base annual state agency response cost is estimated at $10,089. An additional 33% of the estimated base annual state agency respondent cost is added to represent fully loaded wages, equaling $3,329. Thus, the total annual state agency respondent cost is $13,418.

# A.13 Estimates of Other Total Annual Cost Burden to Respondents and Record Keeper

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

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

# A.14 Annualized Cost to the Federal Government

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

The total cost to the Federal government is $8,519,792 over a 56-month period, or $1,805,664 on an annualized basis. The largest cost to the Federal government is to pay a contractor $8,386,100 to conduct the study and deliver data files. The information collection also assumes that a total of 400 hours of Federal employee time per year: for a Social Science Research Analyst/Project Officer, GS-13, Step 5 in the Washington-DC locality, at $53.85 per hour for a total of $21,540, per year. An additional 33% of the estimated base annual cost to the Federal government is added to represent fully loaded wages, equaling $7108.20. Thus, the total annual cost is $26,648.20. We base the Federal employee pay rates on the Office of Personnel Management (OPM) salary table for 2019 for the Washington, DC, metro area locality (for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA).[[18]](#footnote-19)

# 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 collection of information estimated to add 38,569 total annual burden hours and 88,434 total annual responses as program changes to OMB’s burden 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.**

We plan to analyze the data using descriptive, bi-variate, and multivariate analysis. We will synthesize and publish the findings in a technical final report form and post both the findings and a summary for the public on the FNS website. The final report will address all research objectives. We will conduct the following data analyses:

**Prepare analytic data files.** We will clean and edit the survey data and construct any needed analysis variables. First, we will consolidate the survey data, then edit, clean, and create the final analysis files using stringent quality control procedures, including range checks, duplicate file submission checks, and data consistency checks. We will record and document all corrections, updates, or additions to the data. We will apply coding schemes, as needed, to organize and categorize the original data, and will examine frequencies as a preliminary step in the analysis. We will create and construct the variables required for analysis.

**Prepare sampling weights**. We will prepare sample weights to support data analysis and to provide with the public use and restricted use data files. We will weight outcome measures derived from the surveys to adjust for differential probabilities of selection, in-person field data collection subsampling, and nonresponse. In addition to the full-sample analytic weights, we will create a corresponding series of jackknife replicate weights and attach them to each data record for variance estimation purposes. Replication methods provide a relatively simple and robust approach to estimating sampling variances for complex survey data when using variance estimation software to calculate standard errors of the survey-based estimates and to perform statistical tests that take account of the complex sample design.

**Tabulate data**. We will weight data tabulations to present nationally represented estimates and State specific estimates. We will develop data tables for all research questions under the six research objectives, using univariate analyses techniques to describe characteristics of recipients and bivariate analyses to compare characteristics.

**Multivariate statistics and cross tabulations**

We will conduct analyses for each State and for the nation. Additionally, for objective 6 we will use regression analysis to explore the factors that are associated with employment. All statistics will be reported using survey weights and provide the weighted and unweighted sample sizes. The final report will include two volumes: the first volume will provide the National analysis and narrative interpretation, with a summary of State variation for key statistics, and the second volume will provide detailed tables for each State. All tables will include the point estimate and standard errors.

**Project Time Schedule**

Table A-2 shows the planned schedule for the Survey of SNAP and Work.

**Table A-2. Project schedule**

|  |  |
| --- | --- |
| Activity | Schedule |
| Conduct pretest | February 2018 – August 2019 |
| Prepare OMB PRA package | July 2019 – September 2019 |
| Recruitment and disseminate advance materials | 3 weeks following OMB clearance |
| Data collection | 3 weeks following OMB clearance (6 months) |
| Analysis | 2 weeks after close of data collection (4 months) |
| Reporting | 3 months before end of contract |
| Data files and documentation | May 2023 |

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

**If seeking approval to not 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 the Certification for Paperwork Reduction Act Submissions

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

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

1. <https://fns-prod.azureedge.net/sites/default/files/resource-files/SNAPsummary-5.pdf> [↑](#footnote-ref-2)
2. U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2015,* by Kelsey Farson Gray, Sarah Fisher, and Sarah Lauffer. Project Officer, Jenny Genser. Alexandria, VA, 2016. [↑](#footnote-ref-3)
3. FNS refers to nondisabled individuals as those who are able-bodied, that is, fit for employment. In contrast, the disabled are individuals who are medically-certified as physically or mentally unfit for employment, including those who are pregnant. [↑](#footnote-ref-4)
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