
APPENDIX E.2 COMMENTS FROM THE NATIONAL AGRICULTURAL STATISTICS SERVICE

Review of Study of How States Safeguard SNAP Participants' Personally Identifiable Information (PII)

Reviewer:

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Summary of Study:

The proposed exploratory/descriptive study aims to determine the current practices, legislation and regulations used by State/Territory Agencies (SAs) to protect Supplemental Nutrition Assistance Program (SNAP) participants' Personally Identifiable Information (PII) and then establish best practices for safe guarding PII. The study will first use a web-based questionnaire to survey the current methods/practices used by the 53 U.S. SAs to safeguard/protect PII of SNAP participants as well as conduct semi-structured phone interviews with 5 outside industry experts to gain insight into the requirements and challenges when protecting PII. Based on the findings from these 2 activities, semi-structured phone interviews will be conducted with 5 SAs that are determined to be leaders in safeguarding PII to establish best practices and lessons learned.

The goals of the study are worthy of investigation. Items required in an OMB docket are touched upon in the various *Appendices* and to some degree in *Supporting Statements Parts A and B*, but the *Supporting Statements Part A and B* need more detail for readers to understand the survey methodology. Areas where background and/or elaboration would improve understanding are described below.

In *Supporting Statement Part A*, *Table A.3* shows that 10 Industry Experts and 7 SA leaders will be initially contacted to participate in the study and after a number of follow-ups, there is an expectation that there will be 5 Industry Experts and 5 SA respondents. Yet for the 53 SAs, it is anticipated that nearly 100 percent of the SAs will participate. Since pretest findings described in *Appendix G.1* did not show close to a 100 percent response, perhaps, a more detailed explanation of why there is a difference in expectations for the different groups, especially since the study is not mandatory for any of the respondents.

Supporting Statement Part B briefly mentions the use of a non-response adjustment factor if the response rate falls below 80 percent, but no details regarding the methodology are provided. States with fewer resources may be less likely to respond, so how will data/information regarding these states/territories be covered and included.

A more detailed plan of how experts will be selected for the survey, including how to ensure good coverage would also be helpful. The technique of “snowball sampling,” mentioned in *Supporting Statement Part B*, to select industry experts may lead to like-minded experts, rather than good coverage. In turn, the selection of industry experts will influence the selection of SA leaders and the establishment of best practices. It may be hard to establish the same best practices for all SAs due to differences in available resources, caseloads and methods of reporting (state/county/territory). Perhaps the SAs can be stratified and stratum specific guidelines/best practices established rather than a single set of guidelines/best practices.

Confidentiality may be an issue when numerical data (for example, *Appendix B.2 question 5.17*) is summarized (aggregated). Will the summarized data be reviewed for potential disclosure and appropriate disclosure avoidance techniques be employed as necessary?

General comment: spelling, accuracy and consistency of table rows and section headings should be reviewed.

- All acronyms should be defined when first referenced, so that the general public can easily follow what is written (for example, in *Supporting Statement Part A*, FNS and EBT).
- For clarity and ease of understanding, tables should include brief headings rather than reference to columns keys (for example, *Supporting Statement Part A Table A.3* is difficult to understand while the table in *Appendix E-1* is easier to follow).
- Tables should be reviewed for correctness and consistency of rows/ headings (for example, *Supporting Statement Part A Table A.3* row *Industry Experts Interview Recruitment Phone Call Script 2* should be removed. It is inconsistent with table in *Appendix E-1*).
- Spelling should be reviewed and corrected (for example, *Appendix G-12* should be Experts rather than “Exerts”).
- Headings should match to sections (for example, *Appendix G* has Appendix headings referencing section A).

The above examples are *not* an exhaustive listing of issues that should be reviewed and corrected, but for the purpose of example.