

**Office of Management and Budget Information Collection
Review Package**

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

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SUPPORTING STATEMENT PART A: JUSTIFICATION

A.1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

Circumstances that make the collection necessary. This is a new data collection. The collection is necessary to provide up-to-date information on how Supplemental Nutrition Assistance Program (SNAP) State Agencies (SAs) protect personally identifiable information (PII) of SNAP participants and applicants. The U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) has not studied cybersecurity issues in SNAP to date. SNAP SAs are required to follow laws and regulations that protect SNAP applicants' and participants' PII. According to the Food and Nutrition Act of 2008, the statute governing operation of SNAP, such data can only be obtained and used when necessary to operate SNAP. However, little is known about how States safeguard such information.

This study will provide the following:

- Detailed descriptions of laws, regulations, and guidance materials related to safeguarding SNAP participants' PII.
- A national survey of SNAP SAs' policies and practices for protecting SNAP participants' PII. The survey will cover agencies' security plans, use of role-based access to PII, physical and mobile device security, systems security, security practices in sharing or matching SNAP data containing PII with data from other SAs or Federal agencies, and challenges and barriers to implementing safeguarding practices.
- Results of semi-structured telephone interviews with five industry experts. The contractor and FNS will work together to identify experts in State SNAP data systems (including companies that develop and maintain the eligibility and/or Electronic

Benefits Transfer [EBT] systems); leaders of professional organizations that have a broader picture of how States' operations vary; or academic experts in cybersecurity, who would know best practices used in private industry and might be helpful in assessing how to anticipate cybersecurity challenges in the future.

- Results of semi-structured interviews with five SNAP SAs identified as leaders in protecting PII. (These interviews will typically include the same respondents who completed the web-based survey but the respondents will be interviewed jointly, by telephone.) Choice of leading SAs will reflect the results of the web survey, views of industry experts, opinions of FNS headquarters SNAP staff, regional office staff, and Office of State Systems staff. These interviews will emphasize best practices.

Included with this package are the research questions (Appendix A) and paper and online versions of the State SNAP Director survey instrument (Appendix B). Appendix B also includes the various emails, telephone scripts, and other materials that will be used to obtain a high response rate. Appendix C presents the protocol that will guide the semi-structured telephone interviews with industry experts and associated written materials. Appendix D contains the protocol for interviews with staff from SAs that are leaders in protecting PII, as well as the scripts or letters to be used in communications with the SAs.

Legal or Administrative Requirements. There are no legal or administrative requirements that apply to this study. This is an exploratory, descriptive study.

A.2 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.

For what purpose is the information to be used? This is a new data collection, and it is expected to occur once. This study will provide an overview of how security policies are implemented nationwide in SNAP and collect data from experts and SA leaders on best practices for protecting PII in SNAP applications and case records. FNS will use these data to describe and

assess program operations, provide input for legislation and regulations on SNAP, and develop pertinent technical assistance and training for program staff at the State and local SNAP agency levels. Because most SNAP recordkeeping systems are Statewide, collecting data from SNAP SAs is likely to be the best way to assess current SA practices.

From whom will the information be collected? Data will be collected primarily from SNAP State Directors, State cybersecurity experts, and SA staff. In addition, five semi-structured interviews with industry experts will be conducted. Based on survey results and advice from industry experts and FNS, State SNAP Directors and staff in five States that are seen as leaders in safeguarding SNAP participants' PII will be interviewed, in depth, by telephone to help assess factors associated with their success and lessons learned that could be useful to other SAs.

How the information will be collected. Data for the survey of all SNAP SAs will be collected through an online survey. State SNAP Directors can also complete the survey using a paper version of the survey (returned by regular mail) or by telephone (with the survey assistant conducting the telephone interview using the respondent's unique web link to enter responses). In either case, the respondent will be advised of the advantages of the online survey and will be assisted in completion by mail or telephone, if needed.

Table A.1. Overview of Data Collection Activities

Instrument	Respondents	Method of Collection	Estimated Length	Purpose	Frequency
Survey of SNAP SAs	53 States and Territories (up to 3 respondents per SA)	Web survey	90 minutes	To document the practices used by SNAP SAs in all 50 States, the District of Columbia, Guam, and the U.S. Virgin Islands to safeguard the PII of SNAP participants	Once
Industry Expert Interviews on Safeguarding SNAP PII	5 Industry experts	Semi-structured interview	1 hour	To collect information from technical experts who could provide deeper insight into the safeguards that SNAP SAs have implemented to safeguard PII	Once
Telephone Interviews with SNAP SA Leaders in Safeguarding PII	5 SNAP SA leaders and their staff (up to 3 respondents per interview)	Semi-structured interview	1 hour	To collect information from SNAP SAs that have been identified as leaders in safeguarding the PII of SNAP participants	Once

Frequency of information collected. Information shared with any other organizations inside or outside USDA or the government. This information will be collected once. Data files and documentation will be prepared for restricted use only (with masking of data that could identify States, if needed). All results will be presented in aggregated form in the final report, which will be made publicly available in the research section of the USDA FNS website at <http://www.fns.usda.gov/ops/research-and-analysis>. Based on the pretest and team experience, we believe the SA survey will typically require three respondents and will last about half an hour for each respondent, leading to a total burden of 90 minutes per SA. This burden reflects the time needed to identify the respondent(s) best equipped to answer each question. In addition, some staff meetings may be required to achieve a consensus on responses.

A.3 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, to promote the use of technology. As noted, the survey of all SNAP SAs will be provided online for the SNAP SAs to complete. Because there may be different respondents for different sections of the survey, each SA Director will be provided with a personalized link that will allow the respondent to access and respond to the survey. To re-enter the survey, the link from the email may be reused; to allow access to a different respondent, the initial respondent would only need to forward the link to the other respondent. Most survey reminders will be sent via email. The web survey will contain links to the Frequently Asked Questions and to a Table of Contents that the survey respondent can use to navigate between different sections of the survey. The survey will contain skip logic to reduce time and burden and will be set up for completion on a mobile phone. Responses can be submitted by clicking the “Submit” button at the end of the survey. If a survey is largely complete but the respondent did not hit “Submit”, the survey staff will contact the respondent, if possible, by email, or mark the survey as submitted, provided it meets criteria that will be set in advance of data collection. Electronic systems are used for all these steps. For the semi-structured telephone interviews, the main technology used will be recording of interviews, if the respondent agrees to do so. Such recordings will be transcribed, and then can be analyzed using NVivo. If the respondent prefers not to be recorded, a member of the study team will take detailed notes.

A.4 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.

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 and determined that no current data are similar to that proposed for collection in this study. Some related information is provided in Advance Planning Documents that States seeking funding for systems development must submit to FNS, but not in sufficient detail to answer this study's research questions.

A.5 If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

No small businesses or entities are included in this study.

A.6 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 data collection. Without this data collection, FNS will not have information on how States protect SNAP participants' and applicants' PII, how this varies from State to State, and how these protections are implemented on a day-to-day basis. FNS would also not obtain advice on best practices from industry experts and SNAP State agency staff who operate especially strong safeguarding programs.

A.7. 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 three 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; 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 in 5 CFR 1320.5.

A.8 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.

Notice of this study was published in the *Federal Register* (Volume 84, Number 53, Pages 10025-10030) on March 19, 2019, specifying a 60-day comment period ending May 19, 2019.

The Federal Register Notice is included as Appendix E.1. FNS did not receive any comments during the 60-day comment period.

Actions Taken by the Agency

- In addition to soliciting comments from the public and affected stakeholders, FNS had this information collection request reviewed by Beth Schlein from the National Agricultural Statistics Service (NASS) for an expert assessment of the study design and methodology. NASS comments and the FNS response to NASS comments are available in Appendices E.2 and E.3, respectively.
- Four SNAP experts were consulted about this study. They include a former State SNAP Director, Larry Goolsby, who participates in this study as a consultant to 2M Research (2M); Maurice (Bill) Walker, the SNAP Electronic Benefit Transfer Coordinator, and Michael Isaac, the Application Development Manager, both at the Oregon Department of Human Services and the Oregon Health Authority; and

Allison Davis, Chief Information Security Officer at the New Jersey Department of Human Services (at the time of an exploratory discussion).

- Other experts consulted include Ann Collins, consultant to 2M, and two senior 2M staff, Drs. Nicholas Beyler and Steven Garasky. Ann Collins has more than 25 years of experience working with State and local agencies, including those responsible for administering SNAP, in addition to other agencies and organizations involved with FNS programs that collect and manage participant data. Dr. Garasky has over 30 years of experience as a researcher and an evaluator of domestic social policies and programs, with extensive experience in developing study designs and designing survey questionnaires. Dr. Beyler has more than 15 years of experience in sample design, analysis of complex survey data, and measurement error adjustments. Either Dr. Beyler or Dr. Garasky has reviewed every 2M deliverable submitted to date. Joshua Townley, 2M’s IT director, also reviewed the survey and provided valuable comments.

Table A.2 Experts Consulted Regarding this Study

Beth Schlein, Mathematical Statistician NASS, USDA beth.schlein@nass.usda.gov	Larry Goolsby, Consultant to 2M goolsbycl@gmail.com 301-946-6479
Maurice (Bill) Walker, Electronic Benefits Transfer Coordinator Oregon Department of Human Services and Oregon Health Authority Maurice.walker@dshoha.state.or.us 503-945-6075	Michael Isaac, Application Development Manager Oregon Department of Human Services and Oregon Health Authority Michael.r.isaac@dshoha.state.or.us
Allison Davis New Jersey Department of Health, CISO (formerly NJ Department of Human Services, CISO) allison.davis@doh.nj.gov 609-292-1795	Ann Collins, Consultant to 2M Amcfromnyc@gmail.com 617-455-2104
Nicholas Beyler, PhD, Vice President for Social, Behavioral and Methodological Sciences, 2M Research nbeyler@2mresearch.com 703-214-0931	Steven Garasky, PhD Senior Study Director, 2M Research sgarasky@2mresearch.com 817-856-0876
Joshua Townley, 2M Research Special Projects Lead/IT Director jtownley@2mresearch.com 817-856-0862	

These expert consultations provided an array of feedback related to methodology, confidentiality, respondent types, and definitions and concepts included in the survey instrument and interview protocols. Methodological comments focused on providing a detailed plan for identifying a sample of interviewees via a purposive non-probability sample and providing additional details on the study's use of snowball sampling methods. Other comments pertained to providing additional information on the approach for conducting a nonresponse analysis to determine nonresponse bias if the survey response rate falls below 80 percent. The methodological comments were incorporated within Supporting Statement Part B. Comments provided by the experts also focused on the need to ensure confidentiality in the final report and the associated public-use data files. These comments were addressed within Section A-10, which details the associated steps that the study team will take to ensure that confidentiality is maintained throughout all phases of the study.

Experts also provided comments and guidance on the selection of respondent types for the survey instrument and interview protocols. The survey instrument was subsequently revised to include additional language on the suggested respondents for each section, such as SA Directors, Chief Information Security Officers, and data analysts. The interview protocols were subsequently revised to include additional information on the respondent types within SAs for the 'SNAP State Agency Leaders in Safeguarding PII' interview protocol and the types of industry experts who work closely with SNAP State Agencies regarding the protection of PII for the 'Industry Expert' interview protocol. A final set of expert comments pertained to the definitions and concepts included in the survey instrument and interview protocols. These comments suggested revising language within the instruments and protocols to more closely reflect the language used by SAs and industry leaders in their efforts to safeguard PII, such as revising "breach" to "security incident" or "incident response." The survey instrument and interview protocols were subsequently revised to address these comments.

A.9 Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents.

A.10 Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Participants will be subject to assurances as provided by the Privacy Act of 1974 (5 USC §552a), which requires the safeguarding of individuals against invasion of privacy. FNS (and its contractor, 2M) 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. No confidential information will be requested, reported, or maintained as a result of the data collection activities. The State SNAP Directors and other SA staff participating in the web survey will be informed that their personal information (name, telephone number, and so forth) will be kept private but that their responses about SA operations may in rare cases allow for readers to deduce the State being discussed (see Appendix B.4). The SNAP State Directors, other SA staff, and industry experts participating in the semi-structured interviews will be informed that their personal information will be kept private and that their answers will only be reported in aggregated form or via anonymous quotations (Appendix C.2 and D.2).

A collection of steps will be taken to ensure confidentiality is maintained in the final report and the associated public-use data files. To the extent feasible, any data that could be identified inferentially will be masked, and the study team will combine categories if there are fewer than five responses. For numeric responses, outliers may be top- or bottom-coded to prevent identification of the respondent. For interview data, quotations will be used in the report only with permission of the respondent and/or the State Director. As noted above, the data will be available to researchers only as restricted-use files, for which users are required to sign an agreement to protect PII.

To ensure that personal information remains private, the study team is required to create and keep data on secure networks and to use data collectors who sign confidentiality agreements that bind the collectors to protect private information (Appendix F). Survey and interview respondents will be assigned a unique ID number, and analyses will be conducted on datasets that include only respondent ID numbers. While FNS will maintain a separate file that links the unique ID numbers with respondent contact information, that file will be kept private and will not be made available for public use. All restricted-use data will be deidentified or masked, as needed, to protect respondent privacy. All data will be transmitted to the study team via secure networks, mail, or telephone and will be stored in locked file cabinets, or on password-protected computers, only accessible to study team staff. Once the contract has ended, members of the study team will destroy all files containing private information.

FNS published a system of record notice titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19,078–19,080, that discusses the terms of protections that will be provided to respondents.

A.11 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.

A.12 Provide estimates of the hour burden of the collection of information. The statement should:

- **A. 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.**

Table A.3 shows the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials, affected stakeholders,

and prior experience in collecting similar data, as well as findings from a pretest of all instruments, discussed in Part B.

Different response rates are anticipated for the respondents participating in the study's three modes of data collection. The SA Survey is a census of all SNAP SAs, and a 100 percent response rate is anticipated on the basis of FNS's prior experience with conducting SA surveys for other studies, as well as the study's strategy for recruitment and survey completion (as detailed primarily in Section B.3 in addition to Sections A.11, A.12, B.1, and Appendix B). In contrast, it is anticipated that SAs may be less inclined to participate in the subsequent State Agency Leaders Interviews due to the additional time requirements while industry experts are anticipated to have less of an incentive to participate in the Industry Expert Interviews.

Accordingly, 10 industry experts and 7 SAs will be recruited to participate in the respective interviews to ensure that a minimum of 5 industry experts and SAs participate.

Under the procedures discussed in this submission, there are a total of 186 respondents with whom contact will be attempted (179 respondents and 7 non-respondents), 776 responses, and 132 burden hours (120 for respondents and 12 for non-respondents). The average number of responses per respondent is $433/179 = 2.42$, and the average number of responses per non-respondent is $343/7 = 49.0$.

Table A.3 Estimated Annual Burden and Cost for Respondents**Column Key:**

- (1) Estimated Number of Respondents
- (2) Frequency of Response
- (3) Estimated Total Annual Responses
- (4) Average Hours Per Response
- (5) Estimated Annual Burden (Hours)
- (6) Estimated Number of Non-Respondents

- (7) Frequency of Non-Response
- (8) Estimated Total Annual Non-Responses
- (9) Average Hours Per Non-Response
- (10) Estimated Annual Burden (Hours)
- (11) Estimated Total Annual Hour Burden
- (12) Hourly Wage Rate*
- (13) Total Burden (in \$)

Light Green - Recruiting and Reminders

Light Blue - Participating in Data Collection

Light Orange - Post Follow-up and Thank-You

Affected Public	Respondent Type	Data Collection Activity	Original Sample Size	Responsive					Non-responsive					All		
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)
Private/ Commercial Industry	Industry Experts*	Industry Experts Interview Recruitment Email 1	10	1	1	1	0.05	0.05	9	1	9	0.03	0.27	0.32	\$102.58	\$32.83
		Frequently Asked Questions (FAQs) - Industry Experts	10	10	1	10	0.15	1.50	0	1	0	0.15	0.00	1.50	\$102.58	\$153.87
		Industry Experts Interview Recruitment Email 2	9	1	1	1	0.05	0.05	8	1	8	0.03	0.24	0.29	\$102.58	\$29.75
		Industry Experts Interview Recruitment Phone Call Script 1	8	2	1	2	0.08	0.17	6	1	6	0.05	0.18	0.43	\$102.58	\$44.11
		Industry Experts Interview Recruitment Email 3	6	1	1	1	0.05	0.05	5	1	5	0.03	0.15	0.23	\$102.58	\$23.59
		Industry Experts Interview Recruitment Phone Call Script 2	6	1	1	1	0.08	0.08	4	1	4	0.05	0.32	0.33	\$102.58	\$33.85
		Conducting How States Safeguard SNAP Participant PII Semi-Structured Interview - Industry Experts (Data Collection)	5	5	1	5	1.00	5.00	0	1	0	0.00	0.00	5.00	\$102.58	\$512.90
		Thank-You Email to Study Participants	5	5	1	5	0.05	0.25	0	1	0	0.03	0.00	0.25	\$102.58	\$25.65
Private/Commercial Industry Subtotal			10	5	5	25	0.28	7.06	5	7	35	0.04	1.29	8.35	\$102.58	\$856.55
State Government	SA Directors**	Survey Notification Email (Web Survey with Link)	53	53	1	53	0.05	2.65	0	1	0	0.03	0.00	2.65	\$67.76	\$179.56
		Frequently Asked Questions (FAQs) - Web Survey	53	53	1	53	0.15	7.95	0	1	0	0.15	0.00	7.95	\$67.76	\$583.69
		Survey Reminder Email 1	53	5	1	5	0.05	0.25	48	1	48	0.03	1.44	1.69	\$67.76	\$114.51
		Survey Reminder Email 2	48	5	1	5	0.05	0.25	43	1	43	0.03	1.29	1.54	\$67.76	\$104.35

Affected Public	Respondent Type	Data Collection Activity	Original Sample Size	Responsive					Non-responsive					All		
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)
		Survey Reminder Email 3	43	4	1	4	0.05	0.20	39	1	39	0.03	1.178	1.37	\$67.76	\$92.83
		Survey - State SNAP Agency (SA) Director Telephone Reminder Script 1	39	5	1	5	0.08	0.40	34	1	34	0.05	1.70	2.10	\$67.76	\$142.30
		Survey Reminder Email 4	34	4	1	4	0.05	0.20	30	1	30	0.03	0.90	1.10	\$67.76	\$74.54
		Survey - SA Director Telephone Reminder Script 2	30	5	1	5	0.08	0.40	25	1	25	0.05	1.25	1.65	\$67.76	\$111.80
		Survey Reminder Email 5 (Web Survey with Link)	25	5	1	5	0.05	0.25	20	1	20	0.03	0.60	0.85	\$67.76	\$57.60
		Survey - SA Director Telephone Reminder Script 3 (Web Survey)	20	4	1	4	0.08	0.32	16	1	16	0.05	0.80	1.12	\$67.76	\$75.89
		Survey Reminder Email 6 (Web Survey with Link)	16	4	1	4	0.05	0.20	12	1	12	0.03	0.36	0.56	\$67.76	\$37.95
		Survey - SA Director Telephone Reminder Script 4 (Web Survey)	12	3	1	3	0.08	0.24	9	1	9	0.05	0.45	0.69	\$67.76	\$46.75
		Survey - Survey Reminder Email 7 (Web Survey with Link)	9	3	1	3	0.05	0.15	6	1	6	0.03	0.18	0.33	\$67.76	\$22.36
		Survey - SA Director Telephone Reminder Script 5 (Web Survey)	6	3	1	3	0.08	0.24	3	1	3	0.05	0.56	0.39	\$67.76	\$26.43
		Survey Reminder Email 8 (Web Survey with Link)	3	3	1	3	0.05	0.15	0	1	0	0.03	0.00	0.15	\$67.76	\$10.16
		Conducting How States Safeguard SNAP Participant PII Web Survey (Data Collection)	53	53	1	53	0.50	26.50	0	0	0	0.00	0.00	26.50	\$67.76	\$1,795.64
		Post-Survey Response Clarification Email (Web Survey)	5	2	1	2	0.05	0.10	3	1	3	0.03	0.09	0.19	\$67.76	\$12.87
		Post-Survey Response Clarification Phone Call Script (Web Survey)	3	3	1	3	0.08	0.24	0	1	0	0.05	0.00	0.24	\$67.76	\$16.26
		Post-Survey Thank-You Email (Web Survey)	53	53	1	53	0.05	2.65	0	1	0	0.03	0.00	2.65	\$67.76	\$179.56
		Pre-Interview Notification Letter (Semi-Structured Interview - SA)	7	1	1	1	0.05	0.05	6	1	6	0.03	0.18	0.23	\$67.76	\$15.58
		FAQs - State Leaders	7	7	1	7	0.15	1.05	0	1	0	0.15	0.00	1.05	\$67.76	\$71.15
		Semi-Structured Interview - SA Recruitment Email 1	6	1	1	1	0.05	0.05	5	1	5	0.03	0.15	0.20	\$67.76	\$13.55
		Semi-Structured Interview - SA Recruitment Phone Calls 1	5	1	1	1	0.08	0.08	4	1	4	0.05	0.20	0.28	\$67.76	\$18.97
		Semi-Structured Interview - SA Recruitment Email 2	4	1	1	1	0.05	0.05	3	1	3	0.03	0.09	0.14	\$67.76	\$9.49
		Semi-Structured Interview - SA Recruitment Phone Calls 2	3	1	1	1	0.08	0.08	2	1	2	0.05	0.10	0.18	\$67.76	\$12.20
		Conducting How States Safeguard SNAP Participant PII Semi-Structured	5	5	1	5	1.00	5.00	0	0	0	0.00	0.00	5.00	\$67.76	\$338.80

Affected Public	Respondent Type	Data Collection Activity	Original Sample Size	Responsive					Non-responsive					All		
				(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)*	(13)
		Interview - State Leaders (Data Collection)														
		Thank-You Email for Participation in Study	5	5	1	5	0.05	0.25	0	1	0	0.03	0.00	0.25	\$67.76	\$16.94
	Information Technology Systems Staff***	Conducting How States Safeguard SNAP Participant PII Web Survey (Data Collection)	53	53	1	53	0.50	26.50	0	0	0	0.00	0.00	26.50	\$54.76	\$1,451.14
		Conducting How States Safeguard SNAP Participant PII Semi-Structured Interview - State Leaders (Data Collection)	5	5	1	5	1.00	5.00	0	0	0	0.00	0.00	5.00	\$54.76	\$273.80
	Program/ Data Analysts ****	Conducting How States Safeguard SNAP Participant PII Web Survey (Data Collection)	53	53	1	53	0.50	26.50	0	0	0	0.00	0.00	26.50	\$40.27	\$1,067.16
		Conducting How States Safeguard SNAP Participant PII Semi-Structured Interview - State Leaders (Data Collection)	5	5	1	5	1.00	5.00	0	0	0	0.00	0.00	5.00	\$40.27	\$201.35
	State Government Subtotal		176	174	2.34	408	0.28	112.95	2	154	308	0.04	11.10	124.05	\$57.84	\$7,175.18
	Total Burden (Private/Commercial Industry and State Government)		186	179	2.42	433	0.28	120.01	7	49.00	343	0.04	12.39	132.40	\$60.66†	\$8,031.73

*Fully-loaded wages were calculated by combining Bureau of Labor Statistics (BLS) median hourly wage data for Computer and Information Systems Managers (11-3021), May 2019 with fringe benefit cost data from BLS Employer Costs for Employee Compensation, June 2019.

** Fully-loaded wages were calculated by combining BLS median hourly wage for General and Operations Managers (11-1021; State government, excluding schools and hospitals), May 2018 with a rate of 33.0 percent of hourly wages to account for fringe benefit costs.

*** Fully-loaded wages were calculated by combining BLS median hourly wage for Information Security Analysts (15-1212; State government, excluding schools and hospitals), May 2019 with a rate of 33.0 percent of hourly wages to account for fringe benefit costs.

**** Fully-loaded wages were calculated by combining BLS median hourly wage for First-Line Supervisors of Office and Administrative Support Workers (43-1011; State government, excluding schools and hospitals), May 2019 with a rate of 33.0 percent of hourly wages to account for fringe benefit costs.

†Average hourly wage of respondent types

Totals:

Estimated Time Per Response	0.17
Number of Respondents	186
Estimated Total Annual Responses	776
Estimated Number of Responses Per Respondent	4.17
Estimated Total Annual Hours	132.40

Estimated Total Burden in Dollars \$8,031.73

A.12.B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Table A.3 also shows the estimated annualized cost to respondents. The estimates of annualized costs to State Government and private industry are based on the burden estimates and fully-loaded hourly wages for each job category that were calculated by combining median hourly wages from the U.S. Department of Labor, Bureau of Labor Statistics (BLS), and average hourly benefit cost data from the 2019 BLS Employer Costs for Employee Compensation (for industry experts) or a rate of 33.0 percent of hourly wages to account for the fringe benefit costs of state government employees (per agency guidance). The estimated annualized cost for State Government, which includes the time of State SNAP Directors ([General and Operations Managers, Occupation Code 11-1021, May 2018](#)¹), is \$4,136.75 (\$67.76/hr. x 61.05 hours). The estimated cost of this data collection for other SA staff, which includes time spent by information security analysts ([Occupation Code 15-1212, May 2019](#)), is \$1,724.94 (\$54.76/hr. x 31.50 hours) and by program/data analysts ([First-Line Supervisors of Office and Administrative Support Workers, Occupation Code 43-1011, May 2019](#)) is \$1,268.51 (\$40.27/hr. x 31.50 hours).² The estimated annualized cost for private industry, industry experts ([Computer and Information Systems Managers, Occupation Code 11-3021, May 2019](#)), is \$856.54 (\$102.58/hr. x 8.35 hours). The estimated annualized total cost to respondents is \$7,986.74.

A.13 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 costs to respondents beyond those presented in Section A.12.

¹ May 2018 data was used as data for General and Operations Managers, Occupation Code 11-1021 was not provided in the May 2019 dataset.

² Due to rounding, the estimates listed here differ slightly from those included in the burden table.

A.14 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 estimated to be \$555,535. The largest cost to the federal government is to pay a contractor \$437,509 over a 30-month period to conduct the study and deliver data files and reports. This contract cost includes overhead costs, as well as the direct costs for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items.

This information collection also assumes the cost of FNS employees, which is estimated to be \$118,026. This cost was calculated as follows. The FNS employee, Program Analyst, involved in project oversight, is estimated at GS-13, Step 10, with a fully-loaded wage rate of \$92.51 per hour³. FNS anticipates this person will work 400 hours per year for 2.5 years, for a combined total of 1,000 hours. The total cost for the FNS Program Analyst is \$92,510. The cost of the FNS employee, Branch Chief, involved in project oversight with the study is estimated at GS-14, Step 6, with a fully-loaded wage rate of \$98.11 per hour⁴. We estimate that this person will work 100 hours for a cost of \$9,811. The cost of one FNS employee providing expert subject matter guidance on State computer systems and PII is estimated at GS-13, Step 5, with a fully-loaded wage rate of \$78.77 per hour⁵. We anticipate that this employee will work 100 hours for a cost of \$7,877. The cost of one FNS employee providing expert subject matter guidance on FNS policy regarding PII is estimated at GS-13, Step 4, with a fully-loaded wage rate of \$78.28 per hour⁶.

³ Fully-loaded wages were calculated by dividing the annual salary rate by 2,080 hours per year and combining a rate of 33.0 percent of hourly wages to account for the fringe benefit costs of federal government employees (per agency guidance).

⁴ Fully-loaded wages were calculated by dividing the annual salary rate by 2,080 hours per year and combining a rate of 33.0 percent of hourly wages to account for the fringe benefit costs of federal government employees (per agency guidance).

⁵ Fully-loaded wages were calculated by dividing the annual salary rate by 2,080 hours per year and combining a rate of 33.0 percent of hourly wages to account for the fringe benefit costs of federal government employees (per agency guidance).

⁶ Fully-loaded wages were calculated by dividing the annual salary rate by 2,080 hours per year and combining a rate of 33.0 percent of hourly wages to account for the fringe benefit costs of federal government employees (per

We anticipate that this individual will work 100 hours, for a cost of \$7,828. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2019 for the Washington, DC locality, and, for one employee, for the Denver, Colorado locality.

A.15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This submission is a new information collection request as a result of program changes and will add 132 hours of burden to OMB’s inventory.

A.16 For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Table A.4. Data Collection Schedule, Post OMB Approval

Project Activity	Months after OMB Approval
Conduct interviews with Industry Experts	1-3 months after OMB approval
Conduct survey of SNAP State Agencies	1-4 months after OMB
Conduct interviews with State Agency Leaders	7-8 months after OMB
Prepare Final Report	8-12 months after OMB

Plans for Tabulation of the Survey Data. The analysis of the national survey data will document the practices used by SNAP SAs to safeguard the PII of SNAP participants. Because the survey is a census of SNAP SAs, there is no sampling error. The study team will prepare descriptive statistics, including frequency distributions, means, standard deviations, and minimum and maximum values for all survey items. Bivariate analyses will be used to estimate associations between the adoption of specific practices and features of the SA, with analyses built around the study research questions. Cross-tabulations will be generated to address each research question. As appropriate for the research questions, analyses will be presented by State SNAP caseload size, poverty level, FNS Region, and other characteristics.

Plans for Presentation of the Interview Data. The analyses of the interview data will document best practices in safeguarding PII implemented by industry experts and exemplary SAs, along

agency guidance).

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with challenges they faced. We will use qualitative methods to analyze data, in which we will use a multistep procedure to code interviews. Two study team members will develop a coding scheme based on a sample of interview transcripts; code the interviews in accordance with the coding scheme; adjudicate coding disagreements through negotiated agreement and revise the coding scheme; independently code all interviews with the revised coding scheme; and calculate the overall level of intercoder agreement and the percentage of the initial coding disagreements that were subsequently reconciled. The findings from the qualitative analysis will be presented via a narrative discussion in which quotations and tables will be used to highlight key findings. Graphical elements will be used to make the findings more readable.

Plans for Publication. Study findings will be synthesized and published in a final report, which will be posted on the FNS website.

A.17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

FNS will display the OMB approval number and expiration date on all instruments.

A.18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

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