

Appendix Z. Privacy Act Officer review

OMB No. 0584-[NEW]

*Survey of Supplemental Nutrition Assistance Program (SNAP)
Employment and Training (E&T) Case Management*

April 9, 2021

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Food and Nutrition Service
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From: Marling, Miguel - FNS

Sent: Tuesday, March 2, 2021 2:41 PM

To: Corey, Kristen - FNS

Subject: RE: ICR review of Case Management Survey study

Importance: High

Good afternoon,

I just wanted to summarize our conversation from yesterday afternoon and express my recommendations –

- (1) We discussed the Privacy Act “Statement.” If you are to remove the language of the applicability of USDA/FNS-8 from the footnote where it was present in the Narrative, I don’t think there was another mention – that works, as we re-identified that the collection does not meet the requirement for PII that indicate SORN applicability. Records will not be retrieved routinely by the minimal PII collected.
- (2) If the SORN is no longer associated but you choose to keep the language in the Privacy Act --- “Notice” that’s fine too. But, change the “Statement” to “Notice” and be sure not to reference the SORN USDA/FNS-8.
- (3) In the narrative – A10, we discussed that you could make mention of the Privacy Act “Notice,” to add more specificity.
- (4) We discussed the adjustment to some spacing/formatting of the Privacy Act “Notice” on the website where participants would go. The “Routine Use:” section had been merged with the previous section. It could be moved down, justified left, and the section heading made bold.
- (5) We discussed that you might consider the reference in the OMB Burden Statement to the form not being returned to the address. Thought not a Privacy concern, it might not seem to be applicable from a member of the public’s perspective.
- (6) We spoke broadly about the logical consistency of including the Privacy Act “Notice” on any given instrument, since on some it might not be applicable.

I hope I am not leaving anything out that we discussed; I feel like some of these are very nuanced, not-concrete pieces. On the whole the documentation was in great shape! Feel free to reach back if needed.

Please take this email and recommendations as an expression of clearance respective to Privacy concerns.

Respectfully yours,

Miguel Marling

Privacy Officer

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