

Supporting Statement Part A

OMB No. 0584-[NEW]

Best Practices in Disaster Supplemental Nutrition Assistance Program (D-SNAP) Operations and Planning

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Part A. Justification

A.1. Circumstances That Make Data Collection 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 Food and Nutrition Act of 2008, as amended in 2014,¹ 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 Food and Nutrition Act of 2008 provides FNS the authority to conduct research to help improve the administration and effectiveness of SNAP (see Attachment A: Legal Authority Statutes and Regulations).

The Disaster Supplemental Nutrition Assistance Program (D-SNAP) provides temporary food assistance for households affected by a disaster or emergency (e.g., hurricane, tornado, or wildfire). Eligible households not receiving SNAP at the time of the disaster can receive 1 month of benefits through a D-SNAP, and current SNAP households can be issued supplemental benefits. The Robert T. Stafford Disaster Relief and Emergency Assistance Act² allows FNS to authorize a D-SNAP in areas that have received a Presidential major disaster declaration authorizing Individual Assistance from the Federal Emergency Management Agency, and when commercial food distribution channels are available. The Food and Nutrition Act of 2008 provides FNS with the authority to establish temporary emergency standards of eligibility for households with survivors of a disaster. FNS approves State agencies' requests to implement a D-SNAP, and all D-SNAPs are operated at the State level with assistance from FNS reporting approved under existing OMB control number 0584-0594; Expiration Date: 07/31/2023, titled Food Reporting Program System and OMB control number 0584-0037; Expiration Date

¹ As amended through Pub. L. 113-128, 7 U.S.C. 2026

² Pub. L. 93-288, as amended, 42 U.S.C. 5121 et seq., and related authorities

05/30/2021 (currently going through OMB approval process) titled D-SNAP Benefit Issuance and Commodity Distribution for Disaster Relief Recordkeeping FNS 292A and 292B only. This request is not seeking to increase or decrease those already approved burden requirements.

State use of D-SNAP has increased in recent years.³ The program aided nearly 6 million households⁴ and responded to more than a dozen disasters during fiscal years 2017 and 2018. The frequency, variety, and geographic range of natural disasters have exceeded those in previous decades, leading to greater variety among D-SNAP programs. State agencies that had never operated D-SNAP are running programs for the first time, and experienced State agencies are gaining more experience operating D-SNAP. Therefore, the data obtained through this study on D-SNAP planning and implementation are critical for FNS to effectively assist State agencies in operating D-SNAP.

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.

Use of Information Collected

The primary purpose of this voluntary, one-time data collection is to identify best practices in D-SNAP planning and operations from across the country and for a variety of disaster types. Therefore, FNS is requesting Office of Management and Budget (OMB) approval to collect information from a sample of participating State agencies, local SNAP offices, and D-SNAP stakeholders. The study will profile up to eight recent D-SNAPs in 5 States⁵ selected to represent a diversity of disasters via site visits. Trained interviewers on the study team will interview staff at the State agencies, county SNAP office (if SNAP is county administered), one

³ 2018's billion dollar disasters in context. (2019, February 7). *National Oceanic and Atmospheric Administration*. <https://www.climate.gov/news-features/blogs/beyond-data/2018s-billion-dollar-disasters-context>

⁴ USDA FNS. (2019). *D-SNAP State workgroup recommendations* [Policy guidance memorandum]. <https://www.fns.usda.gov/snap/d-snap-state-workgroup-recommendations>

⁵ Louisiana was selected to because of an approved D-SNAP for a hurricane in 2020 and their use of a preregistration system. North Carolina was selected because of an approved D-SNAP due to a hurricane and a tornado, both in 2018. Tennessee was selected because an approved D-SNAP for a tornado. Oregon was selected because of a D-SNAP approved for wildfires in 2020. Arkansas was selected because of a D-SNAP approved for flooding in 2019.

local SNAP office near a D-SNAP site, and relevant stakeholders for each selected D-SNAP. The study team will also seek to interview any former State or local staff who were closely involved with D-SNAP operations for the relevant disasters. In conjunction with the site visits, the study will include collection and analysis of extant administrative data (from the FNS 292B approved under OMB Control Number: 0584-0594; Expiration Date: 07/31/2023; see Appendix J).

Participating States were selected by FNS to represent a variety of disaster types (e.g., hurricanes, tornados, wildfires). Prior to and during the site visits, the study team will request documents (e.g., outreach materials, training materials, blueprints or schematics) pertaining to the selected D-SNAP(s) from the State agency for inclusion in the document review.⁶ All data collection materials have been pretested; see appendix D for a summary of pretest findings and subsequent revisions to data collection instruments.

FNS seeks to better understand best practices in D-SNAP planning and operations across disaster types, administrative contexts, and geographic locations. This study will culminate in a written report describing D-SNAP operations and planning, including best practices, lessons learned, and challenges, in the 5 study States for 10 recent D-SNAPs. FNS will use the findings from the study to inform and update guidance and technical assistance to State agencies. State agencies may also use the study findings to improve their D-SNAP planning and operations.

Study Objectives

The research objectives of this study as defined by FNS and a description of the data collection are provided in Attachment B: Research Objectives and Approach to Data Collection.

Information Sharing With Other Organizations

FNS plans to post the final report with detailed findings in aggregate form on the FNS website. FNS may share public use datafiles, which will not include any information that would compromise participant privacy, with other entities as requested.

⁶ Most documents will be provided by FNS. Others may be requested from States if documents are referenced by respondents during interviews.

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 will comply with the E-Government Act of 2002.⁷ This section 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.

Approximately 35 percent of this data collection will be collected electronically.

- ▶ **Administrative data.** The study will collect all submissions of SNAP administrative data electronically at <http://snap.insightpolicyresearch.com> using the study team's secure file transfer protocol (SFTP) that encrypts both commands and data, preventing passwords and sensitive information from being accessed during transmission (see Attachments K and L: SFTP Site Instructions for Submitting Administrative Data and Email to State agencies With SFTP Username and Password). Each data administrator will submit one complete caseload file for all SNAP and D-SNAP recipients from the 3 months immediately prior to the disaster, the duration of the disaster, and through 6 months after the disaster (see Attachment J: Final Administrative Data Request and Submission Instructions). Data will not be submitted on a monthly basis.
- ▶ **Document request.** Documentation pertaining to the selected D-SNAP(s) (e.g., outreach materials, training materials, site blueprints or schematics) will be requested from State agencies electronically via email prior to or during the site visits when documents are referenced by respondents during interviews and planning discussions. State agency staff will have the option of submitting documentation to the study team electronically via email or the SFTP site.

⁷ Pub. L. 107-347, 44 U.S.C. Ch 36

- ▶ **Site visits.** Data collected on the site visits will be collected in person by trained and experienced researchers conducting interviews and observations using semi-structured protocols⁸ (see Attachments E.2, F.2, G.2, H, and I.2: Final State Agency Interview Protocol, Final Local Office Director Interview Protocol, Final Local Office Staff Interview Protocol, Final D-SNAP Site Observational Tool, and Final Local Stakeholder Interview Protocol). Information technology will not be used for site visit data collection.
- ▶ **Telephone interviews.** Data collected during interviews will not employ information technology. Instead, some data may be collected over the telephone by trained and experienced researchers conducting interviews using semi-structured protocols (see Attachments E.2 and F.2: Final State Agency Interview Protocol and Final Local Office Director Interview Protocol).

All in-person and telephone interviews will be recorded with the permission of respondents, using digital voice recorders, to aid in note taking. All of this information will be destroyed at the conclusion of this study.

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 prior or ongoing information collection that duplicates the efforts of the proposed data collection. Every effort has been made to avoid duplication, including identifying caseload variables State agencies are already collecting to minimize State agencies' time burden of preparing and submitting datafiles to the study team. To make use of data already provided by State agencies, on behalf of FNS, the contractor who is part of the study team will obtain and review documents, such as D-SNAP plans and post-disaster reports, provided by each State

⁸ This ICR includes, as attachments, both the draft and final versions of the State Agency Interview Protocol, Local Office Director Interview Protocol, Local Office Staff Group Interview Protocol, and Local Stakeholder Interview Protocol. For example, E.1 is the draft version and E.2 is the final version of the State Agency Interview Protocol. We reference the final protocol in the text of the ICR as this is the version that will be used during the data collection. Only final versions of the D-SNAP Site Observational Tool (attachment H) and Administrative Data Request and Submission Instructions (attachment J) are included, because the pretest did not identify any needed changes to the draft versions.

agency. However, a large part of the study depends on obtaining information through interviews and observations in the 5 State agencies for 10 recent D-SNAPs to develop a detailed understanding of how State agencies can best plan for and operate a D-SNAP. Although State agencies submit D-SNAP plans, daily reports during a D-SNAP, and a post disaster report after a D-SNAP, these documents alone are not sufficient to meet the needs of this study. This new data collection will provide the data needed to conduct a complete assessment of D-SNAP best practices.

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.

Some of the local stakeholders interviewed during site visits, such as grocery stores or community-based organizations, could be small businesses. FNS has estimated up to 10 percent of the D-SNAP stakeholder respondents are small entities. Because these businesses partner with the State SNAP agency to implement or operate D-SNAP, they must be included in the study. The local stakeholder interview protocol (see Attachment I.2: Final Local Stakeholder Interview Protocol) has been designed to impose minimal burden on participating local businesses. The information to be requested during the interviews will be the minimum required for the intended use. Each interview will be scheduled at a time convenient to the respondent and last an average of 1 hour. The study team will work with State agencies and local SNAP offices during the planning phase to identify local stakeholders to participate in the interviews.

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 voluntary, one-time data collection request. If this information collection is not conducted, FNS will have a limited understanding of D-SNAP best practices across disaster

types, administrative contexts, and geographic locations. Without this information, FNS will not be able to inform the development of future D-SNAP guidance based on the identified best practices. With an increase in the number of natural disasters in the United States in recent years,⁹ it is critical for FNS to have an up-to-date understanding of best practices in D-SNAP operations and planning from across the country. There are no anticipated obstacles to reducing burden.

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 FNS to conduct this information collection in a manner inconsistent with 5 C.F.R. 1320.5.

⁹ National Oceanic and Atmospheric Administration. (2019, February 7). *2018's billion dollar disasters in context* [Blog post]. <https://www.climate.gov/news-features/blogs/beyond-data/2018s-billion-dollar-disasters-context>

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 Wednesday, July 15, 2020, at 85 FR 42821, volume 85, number 136, pages 42821–42825. The period for comments closed September 14, 2020. FNS received 8 comment(s) for this proposed information collection. The comments appear in Attachments S.1, S.3, S.5, S.7, S.9, S.11, S.13, and S.15: Federal Register Notice Comment from Shely Salemnia, Federal Register Notice Comment from A Andrew, Federal Register Notice Comment Myra Simon, Federal Register Notice Comment from the Florida Policy Institute, Federal Register Notice Comment from the Food Research and Action Center, Federal Register Notice Comment from the California Welfare Fraud Investigators Association, Federal Register Notice Comment from the Academy of Nutrition and Dietetics, and Federal Register Notice Comment from the Western Center on Law and Poverty. FNS's responses to the comments appear in Attachments S.2, S.4, S.6, S.8, S.10, S.12, S.14, S.16: FNS Response to Federal Register Notice Comment from Shely Salemnia, FNS Response to Federal Register Notice Comment from A Andrew, FNS Response to Federal Register Notice Comment Myra Simon, FNS Response to Federal Register Notice Comment from the Florida Policy Institute, FNS Response to Federal Register Notice Comment from the Food Research and Action Center, FNS Response to Federal Register Notice Comment from the California Welfare Fraud Investigators Association, FNS Response to Federal Register Notice Comment from the Academy of Nutrition and Dietetics,

and FNS Response to Federal Register Notice Comment from the Western Center on Law and Poverty. In considering the design of the study, FNS reviewed all comments; no changes were made to the proposed data collection.

Consultations Outside the Agency

FNS consulted with a mathematical statistician from USDA’s National Agricultural Statistics Service (NASS), who reviewed the study methodology and statistical procedures. The review from NASS and the study team’s response to NASS’s comments appear in Attachments T.1: NASS Comments and T.2: Response to NASS Comments, respectively.

The study team consulted with State SNAP personnel from Texas to conduct a pretest of the interview protocols. See table A.8.1 for a list of these individuals consulted outside the agency. Based on the results of the pretest, items were reworded to improve clarity, redundant items were removed, and sections were reorganized to improve the flow of the interview.

Table A.8.1. Individuals Consulted Outside the Agency

Name	Title	Organizational Affiliation	Telephone Number
Elizabeth Garcia	Program Specialist VII	Texas Health and Human Services Commission	512.206.5501
Maria Elena Gomez	Operations Lead	Texas Health and Human Services Commission	512.206.4748
Christopher Adkins	Operations Officer	Texas Health and Human Services Commission	512.206.5636
Hector Garza Jr.	Regional Director	Texas Health and Human Services Commission	956.971.1234
Monica Shepherd	Information Technology (IT) Strategy and Prioritization Manager	Texas Health and Human Services Commission	512.206.4842
Mary Catherine Baily	IT Director	Texas Health and Human Services Commission	512.691.2117
Saravana Jagadeesan	IT Contractor	Deloitte	512.691.2075
Cathy Moore	Executive Director	Epiphany Community Health Outreach Services	703.270.0369
Alison Black	Mathematical Statistician	National Agricultural Statistics Service	202-720-2518

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.

Former State, county, or local staff who participate in an in-person or telephone interview will receive a generic \$30 gift card¹⁰ as a token of appreciation to offset any cellular airtime expenses if the interview takes place over the telephone, or any travel- or childcare-related expenses if the interview takes place in person. The cards will be provided to respondents immediately after the interview if held in person, or by mail if the interview is held over the phone. Attachment Q: Use of Tokens of Appreciation for Former Staff provides a detailed explanation of the factors supporting the use of tokens of appreciation for this study.

No payment or gift will be provided to any current State SNAP agency, county SNAP office, local SNAP office, or D-SNAP stakeholder staff who participate in the interviews.

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, the study team will protect the privacy of all information collected for the study and will use it for research purposes only. All members of the study team with access to the data will be trained on the importance of privacy and data security.

Extant administrative datafiles. State SNAP agencies will submit datafiles using a SFTP site, which prevents any unauthorized access to the information contained in the data submissions. Prior to data analysis, the datafiles received from each State agency (i.e., parent files) will be de-identified so that personally identifiable information (PII) will not be included on the analysis data file provided to USDA. Data records in the analysis files will contain a newly generated,

¹⁰ The study team has not predetermined what type of gift card will be used. As has been approved for previous FNS studies, the team typically asks a local respondent (e.g., the State point of contact during the planning phase) what the most useful type of gift card would be for respondents in that particular community. For example, in some communities it might be a local grocery store, whereas in another community it might be a national chain store. Generic credit card gift cards, such as from Visa and MasterCard, include an activation fee above and beyond the value of the card, which means participants would not receive the full benefit of the token of appreciation.

random numeric identifier that is distinct from the identifier in the parent files. The terms and protections provided to respondents are discussed in Attachment V: FNS-8 USDA FNS Studies and Reports, published in the Federal Register April 25, 1991, volume 56, page 19078.

Site visit and in-depth interview data. The identities of State SNAP agency staff, county SNAP office staff, local SNAP office staff, and local stakeholders will not be disclosed in the data files provided to USDA and 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. For reporting of results, data will be presented only in aggregate form, so individuals and institutions will not be identified. A statement to this effect will be included with all requests for data.

There is no PII collection under the Food Program Reporting System, OMB control number: 0584-0594; Expiration: 7/31/2023 and Report Of Commodity Distribution For Disaster Relief (FNS-292A) And Report Of Disaster Supplemental Nutrition Assistance Program Benefit Issuance (FNS-292B) Recordkeeping Burden Only, OMB control number 0584-0037; Expiration Date: 05/31/2024 – therefore, the agency will comply with the Privacy Act of 1974 for this extant data used. All data (i.e., extant administrative, site visit, and in-depth interview data) will be kept in secure locations. All datafiles provided to FNS will be de-identified, so FNS staff will never handle or see any of the PII. The contractors’ systems do not link to any of FNS’s data management and analysis systems. The contractor’s data processing system was not created for this contract agreement.

FNS’s contractors 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 study 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.

The Confidentiality Pledge, in which employees of the contractor provide assurances to the safeguards described in this section, is provided in Attachment R: Insight Policy Research Information Security and 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.

This data collection plans to collect PII from extant data using FNS (insert the approved FNS form used or the OMB control number that has PII is maintained) which is commonly considered private and sensitive in nature. The PII data (address information) is collected to understand the distance from D-SNAP households' residences to D-SNAP sites and to examine whether and how far households relocate following a disaster. There are no other 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.**
- ▶ **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

This new information collection will have a total of 241 respondents (232 respondents and 9 nonrespondents). The affected public in this study will be 129 State agency and local government staff, 56 business staff, and 56 individuals. FNS anticipates 100 percent participation from our State, Local and Tribal government agencies.

The annual total estimated burden (hours) across all data collection components will be 486.95 hours (486.5 hours for respondents and 0.45 hours for nonrespondents). Time per response will range from 0.5 hours for reading the advance letter and responding to other forms of recruitment to 4 hours for submitting the administrative datafiles. The average frequency of response is 1.06 based on 255 total annual responses (246 responsive and 9 nonresponsive) made by the 241 respondents (232 responsive and 9 nonresponsive). 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. Table A.12.1 and Attachment C: Total Public Burden Hours and Respondent Costs provide more detailed information about the burden and annualized costs to respondents for this collection.

The annualized cost of respondent burden is the product of each type of respondent's annual burden (including pretest and nonresponse burden) and average hourly wage rate. The total annualized cost to respondents is \$18,509.93 (\$15,053.37 for State and local government staff, \$2,672.56 for business staff, and \$784.00 for individuals). An additional 33 percent of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling \$6,108.28. Therefore, the total annual respondent cost is \$24,618.21.

Wage rates are based on the 2019 national occupational employment and wage data from the U.S. Department of Labor's Bureau of Labor Statistics (DOL BLS, n.d.). According to these data, the wage rates of State and county SNAP staff (\$58.88) are the average hourly earnings of workers in management occupations (occupation code 11-0000). The wage rates of State database administrators and architects (\$46.21) are the average hourly earnings of workers in database administration occupations (occupation code 15-1245). The wage rates of State database junior staff (\$44.53) are the average hourly earnings of computer programmers (occupation code 15-1251). The wage rates of D-SNAP stakeholders and local SNAP office directors (\$35.05) are the average hourly earnings of workers in social and community service management occupations (occupation code 11-9151). The wage rates of local SNAP office

frontline staff (\$22.55) are the average hourly earnings of workers in community and social service specialist occupations (occupation code 21-1099). The wage rate of individuals/former State, county, and local staff is \$20.00 (DOL Wage and Hour Division [WHD], n.d.).

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

Respondent Category	Type of Respondent	Instruments and Activities	Appendix	Sample Size	Responsive					Nonresponsive					Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent 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)			
State, Local, and Tribal Government																	
State/local/tribal government	State SNAP Directors* (1 per State)	Pretest	D	2	2	1	2	2.5	5	0	0	0	0	0	5	\$58.8	\$294.40
	State SNAP Directors* (1 per State)	Advance materials and preparation, including all conference and scheduling calls, and submission of documents	O	5	5	1	5	4	20	0	0	0	0	0	20	\$58.8	\$1,177.60
	State SNAP Directors* (1 per State); D-SNAP Policy Lead (1 per State), and Emergency Response Manager (1 per State)	In-person semi-structured interviews in 5 States	E	15	15	1	15	3	45	0	0	0	0	0	45	\$58.8	\$2,649.60
	State information technology staff (1 per State), civil rights staff (1 per State), and communications staff (1 per State)	In-person semi-structured interviews in 5 States	E	15	15	1	15	1	15	0	0	0	0	0	15	\$58.8	\$883.20
	Subtotal for State SNAP staff				32	32	1.156	37	2.3	85	0	0	0	0	85	-	\$5,004.80
	County SNAP Directors*** (2 per State, in 2 States)	Advance materials and preparation, including all conference and scheduling calls, and submission of documents	O	4	4	1	4	4	16	0	0	0	0	0	16	\$58.8	\$942.08
	County SNAP Directors (2 per State, in 2 States), D-SNAP policy lead (2 per State, in 2 States), and emergency response managers (2 per State, in 2 States)	In-person semi-structured interviews in 4 counties	E	12	12	1	12	3	36	0	0	0	0	0	36	\$58.8	\$2,119.68
	Subtotal for county SNAP staff				12	12	1.33	16	3.25	52	0	0	0	0	52	-	\$3,061.76
	State SNAP Database administrator (1 per State)	Pretest	D	2	2	1	2	1.5	3	0	0	0	0	0	3	\$46.2	\$138.63
	State SNAP Database administrator (1 per State)	Advance materials and preparation, including consultative data call	J;O	5	5	1	5	3	15	0	0	0	0	0	15	\$46.2	\$693.15
State SNAP Database junior staffer (1 per State)	Submit test file and submit final file	J	5	5	2	10	4	40	0	0	0	0	0	40	\$44.5	\$1,781.20	

Respondent Category	Type of Respondent	Instruments and Activities	Appendix	Sample Size	Responsive					Nonresponsive					Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent 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)				
	Subtotal for State database administrator			12	12	1.42	17	3.41	58	0	0	0	0	0	58	-	\$2,612.98	
State/local/tribal government (continued)	Local SNAP Office Director	Pretest	D	1	1	1	1	1.5	1.5	0	0	0	0	0	1.5	\$35.05	\$52.58	
	Local SNAP Office Director** (2 per State in 5 States)	Advance materials and preparation, including submission of documents	O	10	10	1	10	2	20	0	0	0	0	0	20	\$35.05	\$701.00	
	Local SNAP Office Director** (the same 2 per State in 5 States that received and reviewed the advance materials)	In-person semi-structured interviews with 1 SNAP director/manager at 10 sites	F	10	10	1	10	1	10	0	0	0	0	0	10	\$35.05	\$350.50	
	Local SNAP Office Staff	Pretest	D	2	2	1	2	2.5	5	0	0	0	0	0	5	\$22.55	\$112.75	
	Local SNAP Office staff (on average, 10 per State in 2 States)	Group discussion with 5 local staff at 10 sites	G	50	50	1	50	2	100	0	0	0	0	0	100	\$22.55	\$2,255.00	
	Local SNAP Office staff (2 per State in 5 States)	Observations of D-SNAP and disaster site with SNAP director/manager at 10 sites	H	10	10	1	10	4	40	0	0	0	0	0	40	\$22.55	\$902.00	
	Subtotal for local SNAP office				73	73	1	73	2.42	176.5	0	0	0	0	0	176.5	-	\$4,373.83
	State/local/tribal government subtotal				129	129	1.11	143	2.6	371.5	0	0	0	0	0	371.5	-	\$15,053.37
Business																		
Business (for profit and not for profit)	D-SNAP stakeholder	Pretest	D	1	1	1	1	1	1	0	0	0	0	0	1	\$35.05	\$35.05	
	D-SNAP stakeholder (3 per disaster)	Advance materials and preparation, including submission of documents	M;O	30	25	1	25	2	50	5	1	5	0.05	0.25	50.25	\$35.05	\$1,761.26	
	D-SNAP stakeholder (3 per disaster)	In-person semi-structured interviews with 1 staff member at 25 stakeholder offices	I	25	25	1	25	1	25	0	0	0	0	0	25	\$35.05	\$876.25	
Business subtotal				56	51	1	51	1.49	76	5	1	5	0.05	0.25	76.25	-	\$2,672.56	
Individuals																		
Individuals	Former State office D-SNAP staff (1 per disaster)	Advance letter and other recruitment	N;O;P	10	8	1	8	0.5	4	2	1	2	0.05	0.1	4.1	\$20.00	\$82.00	
	Former State office D-SNAP staff (8 from among those receiving the advance letter)	In-person semi-structured interview	E	8	8	1	8	1	8	0	0	0	0	0	8	\$20.00	\$160.00	

Respondent Category	Type of Respondent	Instruments and Activities	Appendix	Sample Size	Responsive					Nonresponsive					Grand Total Annual Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent 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)			
Individuals (continued)	Former local office D-SNAP staff (2 per disaster)	Advance letter and other recruitment	N;O;P	20	18	1	18	0.5	9	2	1	2	0.05	0.1	9.1	\$20.00	\$182.00
	Former local office D-SNAP staff (8 from among those receiving the advance letters)	In-person semi-structured interview	E	18	18	1	18	1	18	0	0	0	0	0	18	\$20.00	\$360.00
Individuals subtotal				56	52	1	52	0.75	39	4	1	4	0.05	0.2	39.2	-	\$784.00
TOTAL				241	232	1.06	246	1.98	486.5	9	1	9	0.05	0.45	486.95	-	\$18,509.93

Notes:

* The unique 5 State SNAP Directors respondents are counted once although they participated in multiple activities.

** The unique 10 Local SNAP Office Directors are counted once although they participated in multiple activities.

***The unique 4 Count SNAP Directors are counted once although they participate in multiple activities.

State and County-level SNAP staff: average hourly earnings of workers in Management Occupations (11-0000): \$58.88

State database administrators: Average hourly earnings of Database Administrators and Architects (15-1245): \$46.21

State database junior staff: Average hourly earnings of Computer Programmers (15-1251): \$44.53

Local SNAP office directors and DSNAP Stakeholders: Average hourly earnings of Social and Community Service Managers (11-9151): \$35.05

Local SNAP office staff: Average hourly earnings of Community and Social Service Specialists (21-10099): \$22.55

Individuals/Former State, county, and local Office D-SNAP Staff: Average hourly earnings \$20.00

Sources: DOL BLS, n.d.; DOL WHD, n.d.

A.13. Estimates of Other Total Annual Cost Burden to Respondents or Recordkeepers

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

A.14. Annualized Cost to 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 \$1,004,606 over a 48-month period, or \$251,151.50 on an annualized basis. The largest cost to the Federal Government is to pay a contractor \$877,594¹¹ to conduct the study and deliver datafiles. The information collection also assumes that a total of 416 hours of Federal employee time per year: for a GS-13, step 6 in the locality of Washington, D.C., at \$57.39 per hour for a total of \$23,874.24 (or \$31,752.74 for fully loaded wages). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management effective January 2020.

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 information collection that will add 486.95 burden hours (486.5 response hours plus 0.45 nonresponse hours) rounded up to 487 and 255 annual responses (246 responses for responsive participants plus 9 responses for nonresponsive participants) to the OMB information collection inventory.

¹¹ The contractor costs include fully loaded wages.

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 appears in table A.16.1.

Table A.16.1. Project Time Schedule

Activity	Activity Period Weeks after OMB Clearance
Develop and pretest data collection instruments	November 2019–June 2020
Conduct data collection	4–39 weeks after OMB approval
Conduct data analysis and tabulations	4–43 weeks after OMB approval
Prepare draft and final reports for FNS	35–79 weeks after OMB approval
Conduct briefing at FNS	70 weeks after OMB approval
Prepare datafiles and documentation	48–79 weeks after OMB approval

Note: N/A = not applicable

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-I.

References

DOL BLS (U.S. Department of Labor, Bureau of Labor Statistics). (n.d.). *Occupational employment statistics: May 2018 national occupational employment and wage estimates United States* [Datasets]. https://www.bls.gov/oes/current/oes_nat.htm

[DOL WHD \(Wage and Hour Division\). \(n.d.\). Minimum wage. https://www.dol.gov/WHD/minimumwage.htm](https://www.dol.gov/WHD/minimumwage.htm)