

**SUPPORTING STATEMENT - PART A Justification**  
**OMB Number 0584-NEW**  
**Paperwork Reduction Act of 1995**  
**Evaluation of Child Support Enforcement Cooperation Requirements**

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**A1. 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.**

This is a new information collection request. The Agriculture Improvement Act of 2018 (Public Law, 115-334) requires the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) to conduct an independent evaluation of the child support cooperation requirement in the Supplemental Nutrition Assistance Program (SNAP) (Appendix A1: Legal Authority Public Law, 115-334). The planned data collection fulfills this evaluation requirement. Section 17 [7 U.S.C. 2026] (m) (1, 2) of the Food and Nutrition Act of 2008 (Appendix A2: Legal Authority Section 17, 7 U.S.C. 2026), as amended by the Agriculture Improvement Act of 2018, authorizes the Secretary of Agriculture to enter into contracts with private institutions to assess the implementation, impacts, costs, and benefits of having a child support cooperation requirement (hereafter “requirement”) in SNAP. FNS has contracted with a vendor to conduct this evaluation (Appendix P: Confidentiality agreement). The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (Appendix A3: Legal Authority Public Law, 104-193) gave States the option to require custodial and noncustodial parents who apply for and participate in SNAP to cooperate with the child support program. The goals of this requirement are to increase child support participation, increase the income of families, and reduce their need for public assistance.

Currently, eight States implement the requirement in SNAP, and more are considering adopting one. Several States previously exercised this option but later rescinded it. In States with the requirement, custodial parents (or the child’s primary caretaker) must assist the child support agency in activities such as locating the noncustodial parent, establishing paternity and support orders. An exemption from the requirement for good cause may be granted if it is determined that compliance may harm the participant, or the child involved. States also may opt to require SNAP noncustodial parents to assist the child support agency in establishing and enforcing their financial

and medical support obligations. Those who fail to meet the requirement may be sanctioned, which results in removing the individual’s portion of the SNAP household benefit.

Little is known about the implementation of this requirement in SNAP or its impact on SNAP applicants and participants. A 2018 exploratory study (not subject to the Paperwork Reduction Act) on the use of the requirement in SNAP found that States collect minimal data on its use; there are no Federal reporting requirements associated with this policy focused solely on individuals/households (SNAP participants); and the impact of a requirement on program operations and staff workload, program participation, child support receipt, and families’ economic well-being remains largely unknown.<sup>1</sup> This Evaluation of Child Support Enforcement Cooperation Requirements in SNAP is needed to fill these critical information gaps while also fulfilling the congressional mandate for this independent evaluation.

**A2. Indicate how, by whom, 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 this information collection is to address the objectives presented in Table A.1 and research questions (Appendix B: Study objectives and research questions).

**Table A.1. Study objectives**

1. Assess the implementation of the child support cooperation requirement for each State in the study that currently implements the requirement.
2. Assess the feasibility of implementing the child support cooperation requirement in a sample of State agencies that formerly implemented the requirement or are considering implementing the requirement.
3. Assess the impact of the child support cooperation requirement in SNAP on both custodial and noncustodial parents in study States that have or formerly had a child support cooperation requirement.
4. Assess how State agencies align the procedures for the implementing child support cooperation requirement in SNAP to those in other Federal programs.
5. Determine the costs and benefits to State SNAP agencies, child support agencies, and households of requiring State agencies to implement the requirement.
6. Assess the impact of the requirement on SNAP eligibility, benefit levels, food security,

<sup>1</sup> Selekman, Rebekah, and Pamela Holcomb. “Child Support Cooperation Requirements in Child Care Subsidy Programs and SNAP: Key Policy Considerations.” Issue brief. Washington, DC: Mathematica, 2018.

income, and economic stability.

No other effort addresses these research study objectives. This study's findings can inform national policy discussions on whether to mandate a requirement and help State policymakers make informed decisions about the current option to implement the requirement. It will help FNS and child support programs identify issues for which additional policy analysis or technical assistance is needed. In addition, child support and SNAP staff can benefit from lessons learned through other States' implementation experiences.

Analyses resulting from this data collection will be published in a congressionally mandated report submitted to the U.S. House Committee on Agriculture and U.S. Senate Committee on Agriculture, Nutrition, and Forestry, and will be available to the general public on FNS' website.

**Study design.** FNS will purposively select a total of 12 States (352 State, Local or Tribal Government employees and 12 Business-for-Profit or not-for-Profit stakeholders in 12 States; 750 Individuals/Households in 10 States) for this study. Seven States currently implementing the requirement, two States that formerly implemented it but no longer do, and three States considering implementing it.

A study team will collect qualitative data during in person site visits using three instruments: (1) semi-structured staff interview guide with State and local agency staff, (2) process mapping protocol for small group discussions with local agency staff, and (3) interview guide for in-depth interviews with individuals/households. The study team will also collect program administrative and cost data.

A trained two-person teams will conduct the staff interviews during site visits. In the seven States currently implementing the requirement, these interviews will be conducted over a three-day period; the interviews will include State and local child support and SNAP agency staff. In the three States considering implementing the requirement and the two States that formerly had one, the visits will last 1–1.5 days and will include interviews with State-level child support and SNAP agency staff.

The in-depth and semi-structured interview guides will not be administered in their entirety in each interview. Rather, for each interview, the project team will select and ask questions that are relevant to each respondent and program. Should in person interviews not be feasible due to the evolving nature of the current COVID-19 pandemic and associated restrictions, the study team will be prepared to conduct site visit staff interviews and in-depth interviews with participants telephonically or virtually if needed. The respondent burden associated with this information collection is described in A.12 of this document and in Appendix C: Burden table.

**State, Local, or Tribal Government Staff one-on-one in person interviews** (Appendix D1: Staff interview guide). Visits in all 12 States will include semi-structured in person interviews with State-level SNAP and child support staff, as well as legislative or judicial staff involved in child support policy or case processing. Staff in States currently implementing the requirement can explain its key policy features and considerations, how agencies coordinate and data systems interface, and factors affecting implementation. States that previously had the requirement can explain the prior policies and the reasons for discontinuing them. States considering having the requirement can explain the specific policy features and implementation issues related to the requirement and identify the types of information needed to better understand its feasibility and the effects of adopting it.

In the seven States currently implementing the requirement, site visits will also include staff interviews at two local SNAP and child support agency offices. The study team will interview the SNAP and child support agency office director and direct service staff. These interviews will provide information on local-level requirement policies, processes, and practices that affect implementation.

Process mapping exercise (Appendix D2: Process mapping protocol). At local offices visited in the seven States currently implementing the requirement, the study team will conduct a process mapping exercise with small groups of front-line child support and SNAP staff to obtain step-by-step

descriptions of how the requirement is implemented, how information is shared and processes are coordinated between the child support and SNAP agencies, and where bottlenecks and other challenges exist.

**Business-for-Profit or not-for-Profit interviews** (Appendix D3: Advocacy organization interview guide). The study team will interview one outside stakeholder from an advocacy organization in each of the 12 States. These interviews will provide different perspectives on the rationale, implementation, and effects of the requirement.

**In-depth in person interviews** (Appendix E: Individuals/Households in-depth interview guide). The study team will contact 750 individuals/households to conduct 25–30 in-depth interviews over a weeklong period in 10 States. The in-depth interviews with individuals/households will include a mix of diverse populations, including Hispanic and African-American participants, custodial and non-custodial parents, and relative caretakers. Because of the exploratory nature of this study, the limited number of people subjected to the cooperation requirement and the small number of in-depth interviews that will be conducted, the study does not include Spanish-speakers and all interviews will be conducted in English.

The in-depth interviews will provide invaluable information on participants' views about and experiences with being subject to the requirement. In the seven States implementing the requirement and three States considering it, a trained three-person teams will conduct 90-minute in-depth interviews with individuals/households subject to the requirement, including those who comply, have been sanctioned for noncompliance, or have received a good cause exemption. In the three States considering implementing the requirement, interviews will be conducted with individuals/households who would be subject to the requirement if the State chose to implement it. The interviews will provide information on how these individuals perceive such a requirement would affect them.

To obtain the target population recruitment pool, the study team will request that State SNAP



agencies provide names and household and contact information for current individuals/households who reside in the capital region (where State-level agency interviews will be conducted). In States with a requirement, the study team will also request data on the compliance status for these cases. Trained staff will contact interview individuals/households by telephone to explain the purpose of the interviews, topics to be discussed, logistics, incentives, and to address concerns (Appendix F1: Invitation call script). Staff will send a confirmation letter by mail or, if appropriate, email (Appendix F2: Confirmation letter) to those who agree to participate and call to remind them of the upcoming interview (Appendix F3: Reminder script).

**Administrative data** (Appendix G: SNAP agency administrative data collection instrument; Appendix H: Child support agency administrative data collection instrument). The study team will collect administrative data from State agencies for point-in-time analyses and assessments of the effects of the requirement. The analyses will use data from the three States considering the requirement and the two that previously had one. The study will collect household-level SNAP data on household composition, case status, and reported child support payment or receipt. Estimates will be developed for the number and share of individuals/households who would be subject to the requirement if implemented and the extent of child support provided or received. The study will also collect child support administrative data on paternity, child support orders and payment status and link them to the SNAP administrative data to identify the full set of individuals/households who would be subject to the requirement and their characteristics. The study team will request data needed to link SNAP and child support records, such as the parent's name, date of birth, and Social Security number (OMB control number 0584-0064; Expiration Date 06/30/2021 currently at OMB under review).

To assess the requirement's effects on SNAP applicants and participants, the study team will collect monthly SNAP and child support administrative records from nine States. For the seven

States currently implementing the requirement, the study team will collect administrative data from two years before implementation to the present. For the two States that previously had the requirement, the study team will collect administrative data from two years before and two years following its being rescinded.

The study team will collect child support administrative data on paternity establishment, child support orders, and child support order payment status; as well as SNAP data on the date and disposition of SNAP applications, household composition, and benefit and sanction history. This data will be used to estimate the requirements' effects on child support outcomes, such as paternity establishment, child support orders, and payments made and received; as well as SNAP outcomes, such as application approvals, benefit levels, and sanctions.

Among the nine States that have or previously had the requirement, the study team will explore the feasibility of collecting Temporary Assistance for Needy Families (TANF) data and Medicaid data from States that maintain these data in the same system as their SNAP data. Both programs have their own child support cooperation requirements. Where feasible, SNAP and child support administrative data will be linked to those collected on the date and disposition of TANF and Medicaid applications, TANF benefit and sanction history, and Medicaid coverage and sanction history. This information will be used to assess the overlap of those subject to such a requirement across public assistance programs.

**Cost data** (Appendix I: Cost data collection instrument). The study team will collect cost data through Excel workbooks provided to SNAP and child support agency managers in three States that implemented the requirement in the past five years. The workbooks will cover costs for data matching, planning and training, data cleaning, systems upgrades, coordinating across agencies, and other costs. Workbooks will cover (1) initial implementation costs and (2) ongoing implementation costs. Initial implementation costs will include retrospective information on labor and non-labor and system costs

incurred by the agency in implementing the requirement. Ongoing implementation costs will include labor and non-labor costs associated with administering the requirement after its initial implementation.

**A3. 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.**

Due to the nature of the site visits, which collect data through interviews and process mapping discussions, it is not appropriate to use information technology such as computerized interviewing. A secure File Transfer Protocol (FTP) site will be used to collect child support and SNAP administrative data, thus providing a convenient means for respondents to upload the data securely. The burden associated with the cost data collection will be minimized by providing structured Excel workbooks to collect cost data and providing clear guidance on how costs should be recorded in response to any questions from staff responsible for filling out the workbooks. FNS anticipates all administrative and cost data collection will be submitted electronically through the FTP site. As noted in the 83-I, this accounts for 30.9 percent of the total annual responses. The FTP site URL is <https://www.websiteforthcoming.com>.<sup>2</sup>

**A4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2**

The information collection will not duplicate existing information. There is no other data source providing information that could be used to assess the impact of the requirement on individuals/households, the costs and benefits associated with implementing the requirement, or detailed information at the State agency and local office level on its implementation. This study builds on an exploratory study of cooperation requirements in SNAP and subsidized child care programs, the Exploring Measurement of Performance Outcomes and Work Requirements in Programs Promoting

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<sup>2</sup> Website does not yet exist.

Economic Independence project.<sup>3</sup> It includes a more comprehensive range of research questions and data sources and is designed to address critical existing information gaps about cooperation requirements and their impact that were identified in that study.

**A5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

It is possible that some organizations involved in the staff interviews will be small entities, such as nonprofit community advocacy organizations and some SNAP and child support local offices. The interviews with local SNAP and child support staff and with nonprofit community advocacy staff will be scheduled to minimize any disruption of daily activities. Interviews with community advocacy entities will each involve only one representative. The 12 business-for-profit and not-for-profits identified are all small entities. We anticipate all 12 of these small entities are.

**A6. 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.**

The study team will collect all data at a single point in time except for the cost workbooks, which will be collected in two phases: initial implementation cost and ongoing implementation cost. The data collected will provide unique information in response to the congressional request to answer questions of interest to FNS. FNS would not be able to conduct to an independent evaluation of the child support cooperation requirement in the Supplemental Nutrition Assistance Program (SNAP) in conjunction with the Congressional mandate and the agency would not be able to learn about the implementation of this requirement in SNAP or its impact on SNAP applicants and participants.

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<sup>3</sup> Selekman, Rebekah, and Pamela Holcomb. "Child Support Cooperation Requirements in Child Care Subsidy Programs and SNAP: Key Policy Considerations." Issue brief. Washington, DC: Mathematica, 2018.

**A7. 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 related to these guidelines. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

**A8. If applicable, provide a copy and identify the date and page number of publications in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden. 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 format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

***Federal Register Notice and comments.*** A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, August 14, 2020, volume 85, number 158, pages 49622-49624. FNS received four comments via the *Federal Register* and email for this proposed information collection and they are available at <https://www.regulations.gov>.

These comments and FNS's responses to them are provided in Appendices J1–J4: Public comments

and FNS responses. The comments generally emphasized 1) the importance of SNAP; 2) how child support cooperation requirements could have negative impacts on SNAP participation; 3) the complexity of child support cooperation requirements; and 4) difficulties of data collection, especially during the COVID-19 pandemic and the scope of data collection.

**Consultations outside the agency.** The following individuals/organizations have been consulted about burden estimates and/or other characteristics associated with this data collection: Tanisha Tate Woodson, woodson@npcresearch.com, (503) 243-2436; Michael C. Adrian, AdrianM@michigan.gov, (517) 241-5749; Jane Venohr, jvenohr@centerforpolicyresearch.org, (303) 837-1555; and Doug Kilburg, Douglas.Kilburg@nass.usda.gov, (202) 720-9189 (Appendix K1: NASS comments and Appendix K2: FNS response to NASS comments). All reviewers' comments and suggested edits were considered; however, they were not ultimately incorporated into the interviewer guides. Edits were largely stylistic and did not require the development of new questions or deletion of existing questions included in the interview guide. The comments were generally helpful to the study team in that they provided assurance that the interview guides covered the topics needed to address the study research questions.

**A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

The target population is low-income individuals/households who are or would be subject to the requirement. Interview data will not be representative in a statistical sense, in that they will not be used to make statements about the prevalence of experiences for the entire target populations. However, it is important to secure respondents with a range of background characteristics in order to capture a variety of possible perceptions and experiences with the requirement. Without offsetting the direct costs incurred by respondents for participating in the interviews, such as child care arrangements transportation, or the telephone airtime used to schedule interviews, the study increases the risk that only those individuals able to overcome the financial barriers to participate

will agree to an interview, which would adversely affect the quality of the data.

Previous studies have demonstrated that providing incentives help increase response rates in full-scale data collection effort, reduce non-response bias, and improve population representativeness.<sup>4,5</sup> Singer et al. demonstrated in a meta-analysis that incentives increase participation in face-to-face surveys and more substantial incentives correspond with higher response rates in telephone and in person surveys.<sup>6</sup>

Therefore, in-depth interview respondents will receive a \$50 gift card at the end of each 90-minute interview, intended to offset costs of participation in the study.

Providing payments of \$50 has resulted in adequate response rates for in-depth interviews with similar populations. In the Evaluation of Demonstrations to End Childhood Hunger study (OMB Control Number 0584-0603, Expiration Date 08/31/2018), 61.2 percent of individuals scheduled for in-depth interviews completed their interviews. In contrast, the study to assess the effect of the SNAP on Food Security (OMB Control Number 0584-0563, Discontinued September 19, 2011) offered a \$30 payment to a similar target population for in-depth interviews and achieved a response rate of only 35.9 percent.

The proposed \$50 incentives for the interviews is consistent with other OMB-approved FNS information collections. For example, incentives of the same amount are currently being offered to community members, including parents, participating in one-hour telephone interviews for the Evaluation of the Pilot Project for Canned, Frozen, or Dried Fruits and Vegetables in the Fresh Fruit

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<sup>4</sup> Singer, E., and R.A. Kulka. "Paying Respondents for Survey Participation." In *Studies of Welfare Populations: Data Collection and Research Issues*. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press, 2002, pp. 105–128.

<sup>5</sup> Singer, E., and C. Ye. "The Use and Effects of Incentives in Surveys." *The Annals of the American Academy of Political and Social Science*, 2013, vol. 645, no. 112.

<sup>6</sup> Singer, Eleanor, John van Hoewyk, Nancy Gebler, Trivellore Raghunathan, and Katherine McGonagle. "The Effect of Incentives on Response Rates in Interviewer-Mediated Surveys." *Journal of Official Statistics*, vol. 15, no. 2, 1999 pp. 217-230.

and Vegetable Program for USDA/FNS (OMB Control Number 0584-0598, Expiration Date September 30, 2017). Incentives of the same amount were also offered to individuals/households, including parents, participating in 90-minute focus groups and one-hour in person interviews for the Evaluation of the SNAP Employment and Training Pilots for USDA/FNS (OMB Control Number 0584-0604, Expiration Date January 31, 2019) and, as noted above, the Evaluation of Demonstrations to End Childhood Hunger study (OMB Control Number 0584-0603, Expiration Date 08/31/2018).

**A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The study team is fully cognizant of Federal, State, and USDA data security requirements and will comply with relevant policies related to secure data collection, storage and access, and dissemination and analysis. The study team will adhere to the requirements in the system of record notice, FNS-8 USDA/FNS Studies and Reports, published in the *Federal Register* on April 25, 1991, volume 56, pages 19078–19080 (Appendix L1: FNS-8 USDA/FNS Studies and Reports), as well as FNS-10 USDA/FNS Persons Doing Business with the Food Nutrition Service, published in the *Federal Register* on March 31, 2000, volume 65, pages 17251–17252 (Appendix L2: FNS-10 USDA/FNS Persons Doing Business with the Food Nutrition Service). These notices discuss the terms of privacy and personally identifiable information protections that must be provided to participants in FNS evaluations. Miguel Marling reviewed the data security requirements on April 23rd, 2021. Upon review, he recommended including that the data collection is voluntary and adding a Systems of Records Notice.

The study will maintain the privacy of respondents to the extent permitted by law. It will use information that respondents provide only for the purpose of this research, and only members of the study team will see this information. The research will not cite individuals by name (or other identifying information) in prepared reports. All papers containing identifying information will be



kept in locked areas. Any computer documents containing identifying information will be password protected. Any data collected containing identifying information will be housed on secure servers. Participation in the interviews and responding to questions are voluntary. The trained interviewers will read the Public Burden Statement and explain these privacy provisions, and read the Privacy Act Statement to respondents before the interviews. They will obtain the participants consent by distributing a consent form, explaining its content, and asking those who agree to participate to sign the form indicating their consent. (Appendix M: Consent form for individuals/households in-depth interviews). They will also obtain and record their verbal consent for the interview to be recorded.

The contractor uses extensive corporate administrative and security systems to prevent the unauthorized release of personal records, including state-of-the-art hardware and software for encryption that meets Federal standards and other methods of data protection (for example, requirements for regular password updating), as well as physical security that includes limited key card access and locked data storage areas. All Mathematica staff sign a corporate non-disclosure agreement (Appendix P: Confidentiality agreement). At the end of the project, all interview recordings will be destroyed by the contractor.

**A11. 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 study will collect Social Security numbers in the SNAP and child support administrative data. These are necessary to link SNAP and child support records. Relying on name and address alone would inhibit matching for a high proportion of participants, which would impair the study's ability to estimate impacts and draw conclusions for findings that rely on administrative data.

For individuals/households who voluntarily agreed to participate in an in-depth interview, the study team will ask some questions that respondents may consider sensitive. Potentially sensitive

topics may include (1) family structure, especially relating to the custody of their biological child(ren) or being the primary caregiver for relative and nonrelative children; (2) child support arrangements, employment and general financial circumstances; (3) reasons for noncompliance or good cause exemption; (4) relationship between the noncustodial parent and the custodial parent/primary caretaker; and (5) relationship between the noncustodial parent and the child(ren). For example, asking respondents that made a claim for a good cause exemption from the requirement about the process for obtaining the exemption may prompt the respondent to discuss their fears about and experiences with intimate partner violence by the noncustodial father.

Questions that generate information about these topics is necessary to gain a better understanding of the context in which individuals/households experience and view the requirement, and the effect they perceive it has on them and their family. The study team will inform interview participants that their identities will be kept private to the extent permitted by law, their responses will not affect services or benefits they or their family members receive, and they can choose not to answer any questions that make them uncomfortable. The study team sought and received Institutional Review Board (IRB) expedited approval for this information collection from the Health Media Lab IRB on June 23, 2021 (Appendix O: Institutional Review Board (IRB) approval).

**A12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

**12A) 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.**

The total number of estimated respondents is 1,114 (664 will go on to participate and 450 will not participate) and the total number of annual responses is 1,580 (1,130 from responses and 450 non-responses). Members of the public affected by the data collection include 750 individuals/

households; 352 State and local governments; and the 12 Business-for-Profit or

not-for-Profit/private sector. The affected public and respondent groups identified are as follows:

- Individuals/Households: Parents and caretakers: 300 respondents will participate in 90-minute in-depth interviews and receive a confirmation letter (Appendix F2: Confirmation letter) and reminder call (Appendix F3: Reminder script). There are non-respondents in this group which are discussed below.
- State, Local, or Tribal Government: State or local agency directors and managers: 100 respondents will participate in 60-minute semi-structured interviews. FNS anticipate 100 percent participation from this group.
- State, Local, or Tribal Government: State or local agency direct service staff: 98 respondents will participate in 90-minute semi-structured interviews; 112 will participate in 120-minute process mapping exercises for an average duration of 1.77 hours for these 210 respondents. FNS anticipate 100 percent participation from this group.
- State, Local, or Tribal Government: Staff from State legislature or judicial system: 12 respondents will participate in 60-minute semi-structured interviews. FNS anticipate 100 percent participation from this group.
- State, Local, or Tribal Government: State or local agency directors and managers: 12 respondents will provide SNAP agency administrative data, 12 respondents will provide Child Support agency data, and 6 respondents will provide cost data. FNS anticipates 100 percent participation from this group.
- Business-for-Profit or not-for-Profit: Private sector advocates or other stakeholders: 12 respondents will participate in 60-minute semi-structured interviews. FNS anticipate 100 percent participation from this group.

Additionally, individuals will be asked to read and/or respond to one of the following requests:

- Individuals/Households participant invitation call (Appendix F1: Invitation call script) (750 responses: up to 300 respondents and 450 non-respondents)
- Invitation email and project fact sheet review (Appendix N1–N6: Templates for emails to study states) (124 responses)
- Written data collection request; any needed clarifying discussions (36 responses)
- Request to provide administrative data (24 responses)
- Request to provide cost data (12 responses)

The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond and annual hour burden is shown in Appendix C: Burden table.

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

The annualized cost of respondent burden is the product of each type of respondent’s annual

burden and average hourly wage rate. The total cost of respondent burden is \$64,698.32. An additional 33 percent of the annual respondent cost is added calculate to fully loaded wages. Thus, the fully loaded total annual cost of respondent burden is \$86,048.76.

The total cost of this information collection is calculated as the sum of the annualized costs by respondent category. For each respondent category, the annualized cost is the product of burden hours (including nonresponsive burden) and an assumed wage rate for a corresponding occupation. The estimated costs for the parent/caretaker participants is an hourly wage of \$7.25. This hourly wage represents the Federal minimum wage (U.S. Department of Labor 2020). The wage rates for the other affected members of the public were determined using the most recent available data: the May 2020 National Occupational Employment and Wage Estimates data from the Bureau of Labor Statistics ([http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)).

Using the information from this website, mean hourly wages of State or local agency director/manager respondents (\$60.81) are the average hourly earnings of government personnel in management occupations (11-0000). The mean hourly wages of State or local agency direct service staff respondents (\$51.40) are the average hourly earnings of Other Management Occupations (11-9000). The mean hourly wages of the representatives or staff from State legislatures or judicial system respondents (\$30.70) are the average hourly earnings of Judicial Law Clerks (23-1012). The mean hourly wages of the State or local director/manager respondents (\$36.13) are the average hourly earnings of Social and Community Service Managers (11-9151). For the private sector, the mean hourly wages for advocate or stakeholder respondents (\$23.85) are the average hourly earnings of Community and Social Service Specialists, All Other (21-1099).

**A13. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information, (do not include the cost of any hour burden shown in questions 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 or start-up costs, nor any ongoing operation and maintenance or purchase of services costs associated with this information collection. Although the study is collecting information on the initial implementation and ongoing costs associated with enforcing a child support requirement in SNAP, this data collection is not imposing those costs.

**A14. Provide estimates of annualized cost to the Federal government. 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 for these data collection activities will be \$879,630.08 over a twelve-month period. The largest cost to the Federal government is paying a vendor \$878,278 to help conduct the study; the contract amount is a fixed rate which includes fringe benefits. The information collection also assumes (1) 40 hours of Federal employee time for the twelve-month period for a GS-13, Step 2 in the Washington DC Locality, at \$51.34 per hour, and (2) [4 hours] of Federal employee time for [twelve month period] for a GS-14, Step 1 at \$58.71 per hour in the Washington DC Locality. The total would be [\$2,288.44 (or, including fringe benefits, equaling \$3,043.63 fully loaded)]. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2021.

**A15. 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 which will add 2,766 estimated total annual response and 1,513.72 rounded up to 1,514 estimated total burden hours to the OMB burden inventory.

**A16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The study’s planned schedule for tabulation and publication is presented in Table A.2.

**Table A.2. Project schedule**

<b>Project Activity</b>	<b>Start Activity (Months after OMB approval)</b>
Recruitment and advance materials	3weeks after OMB approval

<b>Project Activity</b>	<b>Start Activity (Months after OMB approval)</b>
Semi-structured program staff and stakeholder interviews	1 month after OMB approval
Process mapping exercise with program staff	1 month after OMB approval
In-depth participant interviews	1 month after OMB approval
Cost data collection	2 months after OMB approval
Administrative data collection	1-2 months after OMB approval
Analysis of information collected	6 months after OMB approval
Submit Report to Congress	12 months after OMB approval

**Data analysis.** The qualitative data collected through interviews with staff and participants will be organized and analyzed to construct State-specific profiles and cross-site themes. All interviews will be coded according to a scheme that aligns with the study’s objectives and key research questions (Appendix B: Study objectives and research questions). Based on the analysis of the coded data, the study team will develop site visit summaries, process map diagrams, and thematic tables and illustrative quotes to organize the findings.

The impact analyses will produce descriptive statistics to examine the effects of requirements in the seven study States that currently have the requirement and the two that previously implemented it. The study team will use a quasi-experimental quantitative methodology to estimate the requirement’s effects on child support outcomes, such as paternity establishment, child support orders, and payments. The impact analyses will also assess the effects on SNAP outcomes, such as application approvals, benefit levels, and sanctions for noncompliance. To the extent feasible, SNAP and child support administrative data will be linked to assess the share of the SNAP population subject to the requirement, compliance with it, and the effects of noncooperation. SNAP and child support data will be linked to Medicaid and TANF data to assess the overlap of those subject to the requirement across public assistance programs.

The collected cost data will be analyzed to estimate (1) total initial implementation costs,

separately by SNAP and child support agencies, and overall; and (2) total ongoing implementation costs, separately by SNAP and child support agencies, and overall. The cost and benefit analysis will synthesize the impact and cost findings to yield net benefit estimates and show how they are distributed across stakeholders.

**Final report.** The final report be published on the FNS and contractor websites. It will provide the study findings on the implementation, impacts, costs and benefits of a cooperation requirement in SNAP, thereby fulfilling the [Agriculture Improvement Act of 2018 \(Appendix A1 Legal Authority Public Law, 115-334\)](#) requirement for FNS to conduct an independent evaluation of the requirement. The report will describe administrative processes and participant experiences in States with the requirement; considerations for policy and implementation in other States; impacts on individuals/households; and costs and benefits associated with the requirement.

**A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The agency will display the expiration date for OMB approval on all instruments.

**A18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I “Certification for Paperwork Reduction Act.”**

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 132).