SUPPORTING STATEMENT - PART A

OMB Control Number 0584-[NEW]

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

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Project Officer: Kristen Corey
Office of Policy Support
Food and Nutrition Service
U.S. Department of Agriculture
1320 Braddock Place Alexandria, Virginia 22314

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A1. 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, one-time data collection. FNS is authorized to collect this data under Section 17 of the Food and Nutrition Act of 2008,[1] which authorizes the Secretary of Agriculture to enter into contracts with private institutions to undertake research that will help improve the administration and effectiveness of the Supplemental Nutrition Assistance Program (SNAP) in delivering nutrition-related benefits. Under SNAP, States are required to operate an Employment and Training (E&T) program to help participants acquire skills, training, and work experience that lead to employment and greater economic self-sufficiency. Section 4005 of the Agricultural Improvement Act of 2018 (2018 Farm Bill) requires States to provide case management in their SNAP E&T programs by October 1, 2019. Case management involves assessing participants' skills, interests, strengths, and challenges, and using this information to develop an individualized plan to connect E&T participants to programs and activities that best meet their employment needs. Case managers can also use assessments to identify resources participants need to be able to participate in E&T activities. State SNAP agencies are required to provide participants with reimbursements for necessary and reasonable expenses that directly relate to their participation in SNAP E&T such as childcare and transportation. Case managers help coordinate these reimbursements, as well as referrals to other services and supports, such as clothing for interviews and mental health services. Participants who receive support in their quest to obtain and maintain jobs that pay livable wages may be more likely to engage in program services and progress toward their goals than those who do not receive such support. Studies of case management in Temporary Assistance for Needy Families E&T programs have found that participants who worked with case managers who handled both program eligibility and E&T were more likely to participate in E&T activities,[2] and that team-based case management with

[1] The Food and Nutrition Act of 2008 as amended through the Agricultural Improvement Act of 2018 (2018), P.L. 115-334, 7 U.S.C. 2026 (a) (1). See Appendix A.

[2] Scrivener, S., J. Walter, T. Brock, and G. Hamilton. "Evaluating Two Approaches to Case Management: Implementation, Participation Patterns, Costs, and Three-Year Impacts of the Columbus Welfare-to-Work Program." Washington, DC: U.S. Department of Health and Human Services, Office of the Assistant Secretary for Planning and Evaluation, 2001.

integrated services showed promise in increasing participants' employment and earnings.[3] However, evidence on the effectiveness of case management in SNAP E&T is limited. This study will gather information on how SNAP E&T programs provide case management (including assessments, participant reimbursements, and other supports) that will help identify lessons learned and best practices that FNS can share with States to implement robust SNAP E&T programs and fulfill the new requirement.

This study includes a survey of all 53 SNAP E&T programs and case study site visits to four States that include semi-structured interviews and observations. This Information Collection Request (ICR) includes four data collection instruments: (1) Survey Instrument (Appendix B); (2) Master Site Visit Discussion Guide (Appendix C); (3) Case Management Observation Guide (Appendix D); and (4) Group Activity Observation Guide (Appendix E).

A2. Purpose and use of the information. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

Purpose and use of information. This study will provide FNS a comprehensive picture of case management in SNAP E&T through four broad objectives: (1) describe States' approaches to SNAP E&T case management; (2) describe States' approaches to SNAP E&T participant assessment; (3) document States' approaches to offering participant reimbursements and other supports; and (4) describe States' responses to the new case management requirement in the 2018 Farm Bill. The study includes a survey of all 53 State SNAP agencies and in-depth case studies of four States that include semi-structured interviews with State and local SNAP office staff and SNAP E&T service providers (in local government SNAP offices and business for- and not-for-profit organizations), and observations of SNAP E&T providers and participants in individual and group E&T program activities. If COVID-19 restrictions are in place after approval of this collection, interviews and observations will be conducted virtually.

Findings from the study will also inform the development of best practices and lessons learned that FNS can share with SNAP agencies and use internally to inform program guidance and future initiatives. This information will be particularly important as FNS continues to work with States and territories to help

[3] Martinson, K., C. Ratcliffe, K. Vinopal, and J. Parnes. "The Minnesota Integrated Services Project: Final Report on an Initiative to Improve Outcomes for Hard-to-Employ Welfare Recipients." Washington, DC: Urban Institute, 2009.

them offer robust SNAP E&T programs and fulfill the new case management requirement.

From whom and how the information will be collected. Table A-1 provides an overview of the data collection instruments, number of potential respondents, method of collection, and purpose. Participation is voluntary. Information on data collection processes can be found in Supporting Statement Part B. The survey will be a complete census of the 53 States and territories implementing SNAP E&T programs; there are no eligibility criteria for recruitment. The main point of contact for the survey will be the 53 SNAP directors, who may designate as many as three staff members to complete sections of the survey. FNS will select and recruit four States for the site visits that provide case management primarily through a network of SNAP E&T providers, and to represent States that recently implemented new case management practices in their SNAP E&T programs or recently implemented innovative approaches to case management, assessment, or participant reimbursements. The study team will work with the State SNAP director and E&T director to select SNAP E&T providers and local SNAP offices to visit based on the number of E&T participants served; the length of time the agency has implemented case management; whether the agency has implemented innovative case management strategies, assessment approaches, or participant reimbursements; the SNAP E&T components provided by the agency; and the location of the agencies to facilitate efficient travel. The study team will work with SNAP E&T providers (local SNAP office and business-for- and not-for profit) to select SNAP participants (individuals) to invite to participate in case management observations to represent a variety of types of activities (e.g., initial assessment, service planning, progress monitoring) and multiple case managers at each service provider. The study team pretested the survey instrument with three State SNAP directors. Survey pretest respondents were selected to represent a mix of administrative structures, program types, and case management practices. As a result of the pretest, we adjusted our burden estimates for the survey to reflect that respondents required more time than estimated (45 minutes vs. 40 minutes). The study team pretested the master discussion guide with three respondents from one State E&T program (one State SNAP director, one local SNAP office director, and one local SNAP office frontline staff). Discussion guide pretest respondents were selected to represent a range of roles in SNAP E&T programs. The pretest confirmed that initial burden estimate of 60 minutes for the site visit discussions was accurate. Appendix G has a list of the changes made as a result of pretesting.

Table A-1. Overview of Data Collection Activities

Instrument	Affected Public	Respondent Type	Method of Collection	Length	Purpose
Survey Instrument - Introduction (Appendix B)	State government	53 State SNAP directors	Web survey with option to complete by fillable PDF form or phone	6 minutes	To describe how SNAP E&T programs provide case management, including assessments, reimbursements, and other supports.
Survey Instrument – Main Sections (Appendix B)	State government	169 State SNAP E&T directors, SNAP policy staff, and SNAP financial staff	Web survey with option to complete by fillable PDF form or phone	13 minutes	To describe how SNAP E&T programs provide case management, including assessments, reimbursements, and other supports.
Survey Instrument Pretest (Appendix B)	State government	3 State SNAP directors	Paper survey and telephone debrief on pretest	45 minutes (survey pretest); 60 minutes (pretest debrief)	To assess question clarity, response burden, and the effectiveness of the delivery method, and to identify whether specific items, question structure, or question order can negatively affect data quality.
Site Visit Master Discussion Guide (Appendix C)	State/local government; Business-for- and not-for profit	120 State/local SNAP directors and staff and SNAP E&T providers	In person discussion	60 minutes	To obtain the perspectives of program directors and staff on the processes and challenges of providing case management in E&T programs.
Site Visit Master Discussion Guide Pretest (Appendix C)	State/local government	1 State SNAP director, 1 local SNAP office director, and 1 local SNAP office frontline staff	Telephone discussion	75 minutes (pretest and debrief)	To ensure respondents understood the phrasing and content of the questions and to determine the need to add or remove questions.
Site Visit Case Management Observation Guide (Appendix D)	Local government; Business-for- and not-for profit; Individuals	24 SNAP E&T providers and 48 SNAP E&T participants	In person observation	60 minutes	To understand how case managers and E&T participants interact and how States administer assessments and inform participants about available participant reimbursements. FNS will ask for a verbal consent from SNAP participants before reading the public burden statement and the observation takes place.

Instrument	Affected Public	Respondent Type	Method of Collection	Length	Purpose
Site Visit Group Activity Observation Guide (Appendix E)	Local government; Business-for- and not-for profit; Individuals	20 SNAP E&T providers and 200 SNAP E&T participants	In person observation	60 minutes	To understand how case managers and E&T participants interact and how States administer assessments and inform participants about available participant reimbursements. FNS will ask for a verbal consent from SNAP participants before reading the public burden statement and the observation takes place.

Frequency of information collected: The survey, interviews, and observations will be completed once in 2021. Data collection will span approximately 3 months.

A3. 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.

In compliance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce respondent burden. The survey of SNAP agencies will be fielded over the web (see Appendix F), but the team will offer alternative options to complete the survey by phone or as a fillable PDF form. If a respondent chooses to complete the survey by phone, the trained interviewer will enter the responses through the web survey platform to reduce data entry burden. Burden will be reduced by programming skips for nonapplicable questions in all modes. For web and phone, pre-filling information from prior questions will eliminate the need for duplicative questions. Edit checks will improve data quality for web and phone completions, as well as streamline the process of data retrieval, cleaning, and coding. The study team estimates that approximately 80 percent of the total responses for the survey will be collected by web at https:\\www.notyetcreated@mathematica-mpr.com. The collection of information for the site visits will mainly be conducted through in person discussions and observations. To reduce the burden of these discussions, States will be asked to submit program documents in advance by email; the study team will use the information in program documents to tailor the discussion guides and reduce the number of questions asked, as possible.

A4. Efforts to identify duplication. 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 information already available. 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. Although States provide some information on case management in their SNAP E&T State Plans, the information is general, not collected systematically, and describes only what the States plan to do. It was concluded that no existing data sources can provide data needed to answer the study's research questions.

A5. Impacts on small businesses or other small entities. 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.

This information collection has been held to the minimum required for the intended use. FNS estimates that 3.5 percent (approximately 13 out of 368) of the respondents involved in the site visits, such as SNAP E&T providers (local SNAP agency and business-for and not-for-profit entities), are small entities as defined by OMB Form 83-I. However, the study team expects the burden on these programs to be minimal. The one-time site visit and interviews will be scheduled in collaboration with the program staff to minimize disruption of daily activities. The site visit team will conduct group discussions to the extent feasible, and no more than 60 minutes will be required of any one individual.

A6. 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. This effort will provide needed information on how States approach case management. Without this effort, FNS will not be able to provide informed guidance to States about implementing the new case management requirement.

A7. Special circumstances relating to the Guidelines of 5 CFR 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 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.

A8. Comments to the Federal Register notice and efforts for consultation. If applicable, provide a copy and identify the date and page number of publication 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.

1. A notice was published in the Federal Register on July 6, 2020 (volume 85, pages 40187-40195). FNS received two comments on this proposed information collection. FNS determined that one of the comments (Appendix H.1) was not relevant to the information collection because it was not related to the necessity or practical utility of the information collection, nor did it address burden elements such as the cost, respondent time burden, the frequency of the collection, or the method of the collection. The second comment (Appendix H.2) supported FNS’ estimates of respondent time burden and offered suggestions about how to minimize the burden on respondents and ensure a quality data collection. FNS’ response to this comment is provided in Appendix H.3.
2. The methodology was reviewed by a representative of the National Agricultural Statistics Service (NASS) Methods Division: Fatou Thiam, Mathematical Statistician, USDA National Agricultural

Statistics Service, 202-692-0106 (see Appendix Y for comments from NASS).

FNS also consulted the below individuals in 2020 about the burden and other aspects of the collection as part of a pretest of the survey and discussion guide. As a result of the survey pretest, we adjusted our burden estimates for the survey to reflect that respondents required more time than estimated (45 minutes vs. 40 minutes). The pretest of the discussion guide confirmed that initial burden estimate of 60 minutes for the site visit discussions was accurate. Other changes made based on their feedback include changes to instruction and question wording and adding or removing questions and survey response choices. Appendix G has a list of the changes made as a result of pretesting.

- Yolanda Dockery, Chief of Staff, Family Investment Administration, Maryland Department of Human Services, 410-767-7670
- Marianne Kerzman, SNAP Program Manager, Wyoming Department of Family Services, 307-777-6313
- Alex Mayer, Program Administrator, SNAP, Division of Economic Assistance, South Dakota Department of Social Services, 605-773-4678
- Kristina Meza, Acting Bureau Chief, CalFresh Policy & Employment, California Department of Social Services, 916-654-1493

A9. Explain any decisions to provide any payment or gift to respondents. 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.

A10. Assurances 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.

The study team is cognizant of Federal, State, and USDA data security requirements. FNS Privacy Officer, Miguel Marling, reviewed (March 2, 2021) this information collection request and determined that the collection is not subject to the requirements of the Privacy Act (see Appendix Z for Privacy Officer's comments). All research staff will comply with relevant policies related to secure data collection, data storage and access, and data dissemination and analysis.[4] All respondents' information

[4] A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991 , Volume 56, Number 80, and located on pages 19078-19080 discusses the terms of protections that will be provided to respondents. Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the protection of records maintained by a Federal agency according to either the individual's name or some other identifier.

will be kept private and not disclosed to anyone but the study team, except as otherwise required by law. Respondents to the survey, interviews, and observations will be informed of all planned uses of data, and that their information will be kept private to the extent permitted by law. States will be assured that any administrative data[5] they provide will be kept private. During the life of the project, all papers and audio recordings that contain participant names or other identifying information will be stored in secured file cabinets and rooms, and electronic data will be maintained on secured, password-protected computer servers. Trained interviewers will keep notes and documents secure at all times while in the field. Both sources of data will be accessible only by approved vendor staff. All vendor staff are required to sign a confidentiality pledge (Appendix I) in which staff pledge to maintain the privacy of all information collected from respondents and not to disclose it to anyone other than authorized representatives of the study. Issues of privacy will be discussed with staff during training. The vendor will destroy all copies of data after transfer to FNS at the end of the contract.

A11. Justification for any questions of a sensitive nature. 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 information collection includes no questions of a sensitive nature.

A12. Estimates of the hour burden of the collection of information. 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.

1. 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.

Members of the public affected by the data collection include individuals; State and local governments; and business for- and not-for-profit agencies administering SNAP E&T programs. The burden estimates for this information collection, including the number of respondents, frequency of response, average time

[5] Data collected under FNS' SNAP Employment and Training Performance Measurement, Monitoring and Reporting Requirements (OMB Control No: 0584-0614, expiration date 12/31/2022) and Supplemental Nutrition Assistance Program Employment and Training Program Activity Report Recordkeeping (OMB Control No: 0584-0339, expiration date 3/31/2021).

to respond and annual hour burden, are shown in detail in Burden Table (Appendix J). The time estimate in the burden table includes time for reading data collection materials, such as emails, as well as responding to the data collection. There is oversampling conducted for individuals (SNAP E&T participants) during recruitment. 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 or third party disclosure reporting. A summary of Appendix J burden appears below:

Table A-2. Reporting

Affected Public	Est. No. of Respondents	No. of Responses per Respondent[6]	Total Annual Responses	Est. Total Hours per Response[7]	Est. Total Burden (Hrs)
State and Local Governments	272	4.7721	1298	0.1621	210.42
Business or Other for Profit	25	2.04	51	1	51
Not for Profit	25	2.04	51	1	51
Individual/Household	248	1	248	0.9742	241.60
Total Burden Estimate	570	2.8912280702	1648	0.3361771845	554.02

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

The base annual respondent cost is estimated at $14,049.41. An additional 33% of the estimated base annual respondent cost must be added to represent fully loaded wages, equaling $4,636.31. Thus, the total annual respondent cost is $18,685.72. 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 nonresponse burden) and an average hourly wage rate for a corresponding occupation. The hourly mean wage rate for SNAP E&T participants is $7.25, the Federal minimum wage (U.S. Department of Labor 2020). The wage rates for other affected members of the public were determined using the most recent available data from the Bureau of Labor Statistics: May May 2019 National Occupational Employment and Wage Estimates data (http://www.bls.gov/oes/current/oes_nat.htm) and are shown below.

[6] Number of Responses per Respondent = Total Annual Responses/Total Number of Respondents.
[7] Total Hours per Response = Total Burden/Total Annual Responses.

Table A-3. Average Hourly Earnings by Type of Respondent

Type of Respondent	Occupational Category	Average Hourly Earnings
State or local agency director/manager	Management occupations (11-0000)	$58.88
State or local agency frontline staff and policy staff	Other Management Occupations (11-9000)	$49.31
State or local agency office directors	Management occupations (11-0000)	$58.88
State or local agency office supervisors	Other Management Occupations (11-9000)	$49.31
State or local agency financial staff	Financial Specialists (13-2000)	$40.03
Private sector for-profit business director	Management occupations (11-0000)	$58.88
Private sector not-for-profit agency directors and supervisor	Social and community services managers (11-9151)	$35.05
Private sector for-profit business supervisor	Other Management Occupations (11-9000)	$49.31
Private sector for-profit agency frontline staff	Community and social services occupations (21-0000)	$24.27
Private sector not-for-profit agency frontline staff	Community and social service specialists (21-1099)	$22.55

A13. Estimates of other total annual cost burden. 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.

No capital and start-up or ongoing operational and maintenance costs are associated with this information collection.

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 annual cost to the Federal government is $194,002.41 which includes fringe benefits. The data collection will cost $501,172.88 over a 31-month period. This total includes the cost of instrument development, data collection and analysis, a report, a briefing, and data documentation. The largest cost to the Federal government is to pay a vendor $473,858[8] to conduct the project. The total cost also includes a total of 150 hours per year of Federal employee time to draft, edit, and manage this collection per year for a total of 387.5 hours over the 31-month (2.583-year) period: for a GS-13, Step 3 in the Washington-DC Locality, at $53.00 per hour, for a total of $20,537.50 (or $27,314.88, FNS used 33% to obtain fully loaded wages). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2021.

A15. Explanation of program changes or adjustments. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

[8] The contractor costs include fully loaded wages because the contract is firm fixed price.

This is a new information collection which will add 554.02 (per ROCIS rounded up to 555) total annual burden hours and 1,648 total annual response to the burden inventory.

A16. 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.

Data collection will begin following OMB approval and run for about 3 months. The study team will use standard quantitative methods to analyze survey data. Analyses will be conducted using a statistical software package, such as Stata. Principal analysis methods will be descriptive, including simple tabulations, as well as cross-tabulations by subgroup as appropriate. The study team will summarize and present the survey data in tabular or graphical form. They will use distributions to summarize the frequency of responses for a particular question, or to cross-tabulate two or more questions.

Qualitative data from the site visits will be analyzed using analysis tables organized by topic. The study team will synthesize data across sources to address the key research questions, including interviews, observations, aggregate administrative data,[9] and program documents, to ensure that findings depend on mutually confirming lines of evidence. To code and analyze the audio-recorded observations, the study team will develop a framework to describe and assess the case management sessions and interactions in the case study States. This framework will enable the study team to systematically identify and categorize common elements of case management interactions for its analysis, such as types of case management techniques, tools, and assessments used.

Results will be presented in the final study report, which will be made public on the USDA-FNS website: http://www.fns.usda.gov/ops/research-and-analysis. The report will include a synthesis of the survey findings, four individual case studies, and 53 State-specific profiles. Table A-4 shows the data collection, analysis, and reporting schedule:

Table A-4. Data collection, analysis, and reporting schedule

Project Activity	Months After OMB Approval
Contact States about survey	1 month after OMB approval
Field survey	1 – 4 months after OMB approval
Conduct site visits	1 – 3 months after OMB approval

[9] Data collected under FNS' SNAP Employment and Training Performance Measurement, Monitoring and Reporting Requirements (OMB Control No: 0584-0614, expiration date 12/31/2022) and Supplemental Nutrition Assistance Program Employment and Training Program Activity Report Recordkeeping (OMB Control No: 0584-0339, expiration date 3/31/2021).

Project Activity	Months After OMB Approval
Code and process data	2 - 9 months after OMB approval
Analyze data and prepare reports	2 – 14 months after OMB approval
Prepare data files and documentation	2 – 14 months after OMB approval

A17. Displaying the OMB Approval Expiration Date. 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 of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19. 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 statement.