

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-[NEW]:

Assessing SNAP Participants' Fitness for Work

June 2022

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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 information request. [The Food and Nutrition Act of 2008 \(the Act\)](#) requires SNAP participants ages 16 to 59 to meet certain work requirements unless they are exempt or show good cause for being unable to work. In fiscal year 2019, over 37 million Americans participated in SNAP, and approximately 42 percent were between the ages of 18 and 59. Of those 18 to 59 years old, about 4 million, or 26 percent, were required to register for work and comply with work requirements as a condition of eligibility (commonly referred to as work registrants)<sup>1</sup>. In addition to work requirements, a subset of work registrants—adults ages 18 to 49 who are not disabled and live in households without dependents—called able-bodied adults without dependents (ABAWDs)—are subject to a time limit on receipt of SNAP benefits unless they work or participate in employment and training activities for an average of at least 20 hours per week for all but 3 months in a 36-month period.

Studies show that many SNAP participants face health conditions that limit an individual's ability to work that can warrant an exemption from these requirements. Recent analyses of the Census Survey of Income and Program Participation (SIPP) data found that almost half of SNAP participants report having a physical, mental, or other health condition that limits the kind or amount of work they can do, and many participants have a condition that prevents them from working at all (Mabli and Cheban 2017)<sup>2</sup>. Studies also suggest that some participants have health conditions not identified by States as part of the determination process. A nationally representative sample of work registrants and SNAP E&T participants found that 35 percent of work registrants and 30 percent of SNAP E&T participants cited health issues as a barrier to employment (Rowe et al. 2017).<sup>3</sup>

States have broad latitude in how to determine if a SNAP participant is considered physically or mentally

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<sup>1</sup> <https://fns-prod.azureedge.net/sites/default/files/resource-files/Characteristics2019.pdf> (Accessed 6/3/21)

<sup>2</sup> Mabli, James and Irina Cheban. 2017. *Supplemental Nutrition Assistance Program Participants' Employment Characteristics and Barriers to Work*. Mathematica Policy Research: Cambridge, MA.

<sup>3</sup> Rowe, Gretchen, Elizabeth Brown, and Brian Estes. 2017. *SNAP Employment & Training (E&T) Characteristics Study: Final Report*. Mathematica Policy Research: Washington, DC.

unfit for work and little is known about how States assess and verify health conditions that limit an individual's ability to work during the SNAP eligibility process. The U.S. Department of Agriculture's Food and Nutrition Service (FNS) has contracted with MEF Associates and its subcontractor, Mathematica, to conduct a study to better understand how States determine whether individuals are exempted from work requirements or have good cause for not meeting work requirements due to a physical or mental limitation. The purpose of this study is to collect data to understand how States determine which individuals are exempt from general work requirements, ABAWD work requirements, and, if applicable, mandatory E&T programs. The key project activities FNS is undertaking to answer these questions are: (1) a document review, (2) a survey of State SNAP agencies, and (3) case studies of four states that involve site visits and administrative data analysis.

#### **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.** The findings from this study will provide FNS with valuable insights into how States develop and implement policies and procedures for determining whether applicants or participants should be exempt from work requirements due to a physical or mental limitation. This one-time data collection will provide information that can help FNS assess States' needs for technical assistance around issues related to exemptions and good cause due to physical or mental limitations and identify lessons learned that can be shared with other State SNAP agencies.

**From whom and how the information will be collected.** The table below provides an overview of the data collection instruments for which the project team is seeking approval as well as additional project materials.

**Table 1. List of Appendices.**

| Instrument or Attachment | Description   | Respondent Type  |
|--------------------------|---|--|
| <b>Instruments</b>       |   |  |
| <b>Appendix B</b>        | Final State SNAP Agency Survey                                    | State SNAP Director and State Policy Staff   |
| <b>Appendix C</b>        | Final State and local SNAP administrator interview guide          | State SNAP Directors, Local Office Administrators, and Local Office Supervisors  |
| <b>Appendix D</b>        | Final State SNAP eligibility workers interview guide              | Local Office Frontline Staff   |
| <b>Appendix E</b>        | Final SNAP E&T provider interview guide                           | SNAP E&T Provider Administrators, Supervisors, and Frontline Staff   |
| <b>Appendix F</b>        | Informed Consent Script for Interviews                            | State SNAP Directors, Local Office Administrators, Local Office Supervisors, Local Office Frontline Staff, SNAP E&T Provider Administrators, SNAP E&T Provider Supervisors, and SNAP E&T Frontline Staff |
| <b>Appendix G</b>        | Informed Consent Form   | State SNAP Directors, Local Office Administrators, Local Office Supervisors, Local Office Frontline Staff, SNAP E&T Provider Administrators, SNAP E&T Provider Supervisors, and SNAP E&T Frontline Staff |
| <b>Appendix H</b>        | Observation guide   | Local Office Frontline Staff/ Individuals  |
| <b>Attachments</b>       |   |  |
| <b>Appendix A</b>        | Legal Authority Statutes and Regulations                          | N/A  |
| <b>Appendix I</b>        | List of requested administrative data elements                    | State Data Staff   |
| <b>Appendix J</b>        | Document review guide   | N/A  |
| <b>Appendix K</b>        | Web Survey  | State SNAP Director and Policy Staff   |
| <b>Appendix L</b>        | Survey recruitment email  | State SNAP Director  |
| <b>Appendix M</b>        | Survey invitation email   | State SNAP Director  |
| <b>Appendix N</b>        | Project Description   | N/A  |
| <b>Appendix O</b>        | Survey thank you email  | State SNAP Director  |
| <b>Appendix P</b>        | Survey reminder email for partial completers                      | State SNAP Director  |
| <b>Appendix Q</b>        | Survey reminder email for non-completers                          | State SNAP Director  |
| <b>Appendix R</b>        | Survey reminder for uploading non-public documents                | State SNAP Director  |
| <b>Appendix S</b>        | Final Survey Reminder Email                                       | State SNAP Director  |
| <b>Appendix T</b>        | Case study recruitment email from FNS                             | State SNAP Director  |
| <b>Appendix U</b>        | Case study recruitment email from project team                    | State SNAP Director  |
| <b>Appendix V</b>        | Pre-test results memorandum                                       | N/A  |
| <b>Appendix W</b>        | Comment from Third Sector   | N/A  |
| <b>Appendix X</b>        | Response to comment from Third Sector                             | N/A  |
| <b>Appendix Y</b>        | Comment from CWFIA  | N/A  |
| <b>Appendix Z</b>        | Response to comment from CWFIA                                    | N/A  |
| <b>Appendix AA</b>       | Comment from Jane Publiee   | N/A  |
| <b>Appendix BB</b>       | Response to comment from Jane Publiee                             | N/A  |
| <b>Appendix CC</b>       | Comment from Nebraska Appleseed                                   | N/A  |
| <b>Appendix DD</b>       | Response to comment from Nebraska Appleseed                       | N/A  |
| <b>Appendix EE</b>       | Comment from Andrew Reamer  | N/A  |
| <b>Appendix FF</b>       | Response to Comment from Andrew Reamer                            | N/A  |
| <b>Appendix GG</b>       | Comment from National Agricultural Statistics Service             | N/A  |
| <b>Appendix HH</b>       | Response to comment from National Agricultural Statistics Service | N/A  |
| <b>Appendix II</b>       | Comment from Center for Budget Policy and Priorities              | N/A  |
| <b>Appendix JJ</b>       | Response to comment from Center for Budget                        | N/A  |



|                    | Policy and Priorities     |     |
|--------------------|---------------------------|-----|
| <b>Appendix KK</b> | Burden Table              | N/A |
| <b>Appendix LL</b> | Confidentiality Agreement | N/A |
| <b>Appendix MM</b> | IRB Approval Letter       | N/A |

**State SNAP Agency Survey.** The project team will conduct a one-time census of the 53 State SNAP agencies<sup>4</sup> through a web-based survey to document policies, guidelines, and procedures used for exempting individuals from work requirements due to physical or mental limitations. All State SNAP Directors will receive a link to the survey, and they can enlist up to three staff to assist them in completing it. As part of the survey, the project team will also collect nonpublic documents from States for those States that have not publicly published their policy manuals and guidance. The project team estimates that all 53 State SNAP directors along with 159 policy staff will contribute to the approximately 60-minute survey (Appendix B). Participation in the survey is voluntary.

**Case studies.** To provide context for the survey findings, the project team will conduct case studies of four States. The case studies will consist of site visits and analysis of the States’ administrative data. The combination of qualitative and quantitative data analysis will allow the project team to examine how the processes are implemented, how much discretion the eligibility staff have, and how much variation there is in how the program operates across the State. The project team will recruit the four States that FNS has identified as priority States representing both State- and county-administered structures. Participation in the case studies is voluntary. Should any of the four States decline to participate, the project team will recruit a replacement from the two alternative States identified by FNS.

*Case Studies: Site Visits.* The project team will conduct in-person site visits to each State, meeting with staff from the State SNAP agency, two local SNAP offices (one rural and one urban), and E&T providers. The project team plans to interview a total of 28 State staff and 16 local staff for the State and Local Administrator Interviews (Appendix C), 64 local frontline staff for the State Eligibility Workers Interviews (Appendix D), and 80 SNAP E&T staff for the SNAP E&T Provider Interviews (Appendix E). The project team also plans to observe eligibility interviews using an observation guide (Appendix H).

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<sup>4</sup> Includes all 50 States, the District of Columbia, the United States Virgin Islands, and Guam

Topics from the interview guides include:

- The State and Local Administrator Interview Guide (85 minutes): policies regarding screening for exemptions from work requirements due to physical or mental limitations and good cause determinations, the processes the State and counties have implemented, the variation in policies and processes across the State, how these policies and processes were developed, the flexibility workers have in making the determinations
- The SNAP Eligibility Workers Interview Guide (85 minutes): procedures for determining ability to work, how they follow guidance from the State or county, and challenges they experience making these determinations.
- The E&T Provider Staff Interview Guide (55 minutes): assessments they conduct and the extent to which they identify health limitations to work, how they relay this information to State eligibility staff, their interactions with eligibility staff, and the outcomes of these interactions.
- The observation guide for eligibility interviews (60 minutes): how the eligibility staff member communicates the policies to the participant, what information the staff person is asked to provide, conversation topics between the staff person and participant, and how staff verify or document potential reasons for determining the participant is not required to work. Participating in the observation is voluntary. SNAP applicants can decline to be observed. No PII will be collected on the applicant participating in the observation.

*Case Studies: Administrative data analysis.* The project team will request administrative data from the four States to explore characteristics of participants that have been exempted from work requirements due to physical or mental limitations (Appendix I). The team will analyze the data for trends by locality and any other factors. The project team will also combine SNAP administrative data from the four case study States with extant data on community characteristics to assess patterns in exemptions from work requirements due to physical or mental limitations and good cause determinations. Specifically, the team will assess patterns and variation in determinations by participant or SNAP unit characteristics and by

locality and the characteristics of communities in which SNAP offices are located.

### **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. Descriptions of how this study will use automated, electronic, mechanical, or other technological collection techniques for each study component are below:

**State SNAP Agency Survey.** The project team will use Qualtrics, a web-based survey platform, to collect survey responses (Appendix K). This will reduce burden for respondents by programming skips for nonapplicable questions, enabling them to submit responses efficiently and on their own time, save their work if they are not able to complete their response at once, and share with colleagues if needed.

The project team anticipates 100% of survey response will be completed via the web link. The web link will also include an opportunity for States to upload their non-public documents within the survey itself.

**Case Studies: Site Visits.** The site visit information collection will be conducted through in-person discussions and observations, and does not provide for the use of information technology to reduce burden. Burden will be reduced by scheduling interviews at convenient times and locations for respondents, as well as in small groups that fit with the schedule and workload of the office being visited. The project team will tailor the interview protocols to select only those questions relevant to each respondent.

**Case Studies: Administrative Data.** To facilitate communication between the project team and the State, the project team will ask each State SNAP administrator to identify a data liaison to work with the project team. The project team will present three options for secure data transmission from which the State can choose: (1) Using a secure file exchange (FX) site; (2) sharing data with FNS which the project team can then access with proper permissions and passwords through FNS' MoveIt; or (3) providing the project team with access to the State's own secure FX site. The project team will inform States that they will

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accept data in a variety of formats and will accept both data extracts (that is, inclusive of only the variables and sample requested in the template) and complete data files (that is, inclusive of all variables in the system, including those not specified in the template).

**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.**

This information will not duplicate information already available. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. The project team will use existing information from the document review to understand what information States already provide related to their policies. The survey and interviews will focus on information that is not available, such as how and why the policies were developed and how they are implemented in practice.

**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.**

The primary organizations involved in this study will be State, county, and local SNAP offices as well as SNAP employment and training providers. It is possible some may be small entities as defined by OMB Form 83-I. This information collection has been held to the minimum required for the intended use. FNS estimates that up to 5 percent of the respondents will be from small entities. For all respondents, but particularly for those that are small entities, the project team will minimize the burden by providing clear guidance on procedures and by requesting only the information required to achieve the study's objective as part of this one-time data collection. Interviews with staff will be scheduled according to their availability, and no more than 90 minutes will be required of any one individual. There should be no adverse impact for any organizations participating in this study.

**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, onetime data collection. If the information collection is not conducted, FNS will not have insight into how States determine whether individuals should be exempt from work requirements due to a physical or mental limitation and will therefore have reduced ability to provide support to States.

#### **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.**

A notice was published in the Federal Register on July 28<sup>th</sup>, 2021 (volume 86, pages 40454-40460). FNS

received 8 comments on this proposed information collection. Responses to these comments are included in Appendix W-JJ.

FNS consulted state staff from Washington, Colorado, and Utah about the burden and other aspects of the collection as part of a pretest of the survey and interview guides. Staff consulted about the survey completed the survey within the burden estimated. Staff reported that some aspects of the survey, such as the order of survey questions, caused confusion. The survey instrument (Appendix B/K) was updated to address their feedback. Staff consulted about the interview guides completed the information collection within the time estimated, except for the State and Local SNAP Administrator Interview Guide (Appendix C) where more time was needed to complete the information collection than estimated. The burden estimate for Appendix C was increased accordingly. Overall, staff consulted about the interview guides thought the interview questions were useful and covered the key topics related to the study. The interview guides were updated to address staff’s feedback on areas where the interview guide could be clearer and where questions could be consolidated to reduce repetition for respondents.

Appendix V describes in more detail the changes made as a result of pretesting. The individuals/organizations consulted about the information collection are listed below.

| Name          | Title                               | Agency  | Phone Number |
|---------------|-------------------------------------|---|--------------|
| Andrea Poole  | SNAP Program Initiatives Supervisor | Colorado Department of Human Services                     | 303-829-7245 |
| Ashley Davis  | SNAP Program Specialist             | Utah Department of Workforce Services                     | 801-830-7879 |
| Corinna Adams | BFET Program Manager                | Washington State Department of Social and Health Services | 360-789-9583 |

**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.**

**Personally Identifiable Information.** In accordance with the Privacy Act of 1974, the project team will protect the privacy of all information collected for the study and will use it for research purposes only, except otherwise required by law. FNS Privacy Officer, Michael Bjorkman, reviewed (March 18, 2022) this information collection request and determined that the collection is not subject to the requirements of the Privacy Act. There were no comments or concerns for this information collection. No information that identifies any study participant will be released. When reporting the results, data will be presented only in aggregate form, so that individuals and institutions will not be identified. Furthermore, the project team will not maintain any personally identifiable information (PII). All members of the project team having access to the data will be trained on the importance of privacy and data security and sign a confidentiality agreement (Appendix LL). All data will be kept in secured locations. Identifiers will be destroyed as soon as they are no longer required.

**Assurances of Privacy.** Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data and that their information will be kept private to the extent permitted by law through the informed consent process (Appendices B, F, and G). The project team will comply with all Federal and Departmental regulations for private information. The project team secured IRB approval through Health Media Labs on August 20<sup>th</sup>, 2021 (Appendix MM).

**Data Security and Monitoring.** The project team shall protect respondent privacy to the extent permitted by law and will comply with all Federal and Departmental regulations for private information. Survey and site visit data will be stored on cloud-based tools purchased through Microsoft Office 365 Business for storage of digital project materials. Office 365 Business meets FISMA requirements and has the FedRAMP Agency Authority to Operate (ATO) at the moderate level. Any paper information will be stored in locked cabinets and will be shredded once scanned. In addition, the project team will adhere to all requirements identified by FNS for staff training on data security. To share data between project staff,

the team will use Box.com. MEF's and Mathematica's data security guidelines include using encrypted laptops for writing up any notes; using secure storage locations; using secure transfer mechanisms; limiting access to only those who need to know; and destroying data once analysis is complete. Additionally, Mathematica will use access control lists to restrict access to encrypted project folders—located on the Mathematica network—where State administrative data will be stored. All administrative data collected for the project will be encrypted at rest and in transmission using Federal Information Processing Standard (FIPS) 140-2 compliant cryptographic modules. The administrative data will be securely destroyed at the end of the contract according to National Institute of Standards and Technology (NIST) and National Archives and Records Administration standards.

**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.**

FNS Privacy Officer, Michael Bjorkman, reviewed and approved (March 18, 2022) this information collection request. The Privacy Officer determined that there are no questions of a sensitive nature included in this information collection. There were no comments or concerns for this information collection.

**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.**

- A. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

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



to respond and annual hour burden, are shown in detail in the Burden Table (Appendix KK). 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. 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 KK appears below:

**Table 2. Summary of Burden.**

| Affected Public              | Est. No. of Respondents | No. of Responses per Respondent | Responsive             |                               |                         | Nonresponsive           |                                 |                        |                               |                         |
|------------------------------|-------------------------|---------------------------------|------------------------|-------------------------------|-------------------------|-------------------------|---------------------------------|------------------------|-------------------------------|-------------------------|
|                              |                         |                                 | Total Annual Responses | Est. Total Hours per Response | Est. Total Burden (Hrs) | Est. No. of Respondents | No. of Responses per Respondent | Total Annual Responses | Est. Total Hours per Response | Est. Total Burden (Hrs) |
| State and local government   | 296                     | 3.16                            | 935                    | 0.3316                        | 310.05                  | 2                       | 2.0                             | 4.0                    | 0.5179                        | 2.07                    |
| Business or other for-profit | 40                      | 3.0                             | 120                    | 0.3611                        | 43.33                   | 0                       | 0                               | 0                      | 0                             | 0                       |
| Not for profit               | 40                      | 3.0                             | 120                    | 0.3611                        | 43.33                   | 0                       | 0                               | 0                      | 0                             | 0                       |
| Individual/Household         | 24                      | 1                               | 24                     | 0.5                           | 12                      | 6                       | 1                               | 6                      | 0.2                           | 1.2                     |
| <b>Total Burden Estimate</b> | <b>400</b>              | <b>2.9975</b>                   | <b>1199</b>            | <b>0.3409</b>                 | <b>408.71</b>           | <b>8</b>                | <b>1.25</b>                     | <b>10</b>              | <b>0.3271</b>                 | <b>3.27</b>             |

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

The total annual respondent cost is \$19,753.98. 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 (not including nonresponse burden) and an average hourly wage rate (fully loaded at 33%) for a corresponding occupation determined using the most recent available data from the [Bureau of Labor Statistics: May 2021 National Occupational Employment and Wage Estimates](#) data and are shown below. For individuals, the federal minimum wage is used as the average hourly rate. Individual wages are not fully loaded.

**Table 3. Description of Respondents and Hourly Earnings.**

| Type of Respondent | Occupational Category | Average Hourly Earnings |
|--------------------|-----------------------|-------------------------|
|--------------------|-----------------------|-------------------------|

|   |   | (loaded at 33%) |
|---|---|-----------------|
| State director/administrator  | Management occupations (11-0000)                    | \$78.88         |
| State policy and data staff   | Other Management Occupations (11-9000)              | \$58.01         |
| Local agency office directors/administrators                                  | Management occupations (11-0000)                    | \$78.88         |
| Local agency office supervisors   | Other Management Occupations (11-9000)              | \$58.01         |
| Local agency frontline staff  | Community and social services occupations (21-000)  | \$34.50         |
| Private sector for-profit business director/administrator                     | Management occupations (11-0000)                    | \$78.88         |
| Private sector for-profit business supervisor                                 | Other Management Occupations (11-9000)              | \$58.01         |
| Private sector for-profit agency frontline staff                              | Community and social services occupations (21-0000) | \$34.50         |
| Private sector not-for-profit agency directors/administrators and supervisors | Social and community services managers (11-9151)    | \$49.10         |
| Private sector not-for-profit agency frontline staff                          | Community and social service specialists (21-1099)  | \$32.29         |
| Individuals   | Federal Minimum Wage                                | \$7.25          |

**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 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 annual cost to the Federal government is \$146,319.68 which includes fringe benefits. The data collection will cost \$585,278.73 over a 48-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 \$454,576.96 to conduct the project. The total cost also includes a total of 520 hours per year of Federal employee time to draft, edit, and manage this collection

per year for a total of 1600 hours over the 40-month (3.33-year) period. Federal employee time was estimated using GS-13 Step 7 in the Washington-Baltimore-Arlington, DC-MD-VA-WV-PA locality for 2022, at \$128,187 for an hourly rate of \$61.42 (assuming 2,080 hours worked per year). A loaded fringe rate of 0.33 was also incorporated, for a loaded hourly rate of \$81.69. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2022.<sup>5</sup>

The table below shows this broken out by task. To estimate the costs, the project team included the labor costs for their staff and other direct costs, such as travel to conduct the site visits.

**Table 4. Summary of Costs to Federal Government.**

| Task                                | Cost                 |
|-------------------------------------|----------------------|
| Develop Data Collection Instruments | \$ 53,318.10         |
| Recruit Case Study States           | \$ 35,830.20         |
| OMB Package                         | \$ 21,275.55         |
| Data Collection Training            | \$ 29,822.32         |
| Collect Admin Data                  | \$ 43,315.03         |
| Site Visits                         | \$ 122,524.18        |
| Analysis and Report Outline         | \$ 73,218.44         |
| Reporting                           | \$ 75,273.15         |
| Federal Employee Time Across Tasks  | \$ 130,701.76        |
| <b>Total Cost</b>                   | <b>\$ 585,278.73</b> |
| <b>Annual Cost</b>                  | <b>\$ 146,319.68</b> |

**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.**

This is a new information collection that will add 412 burden hours (409 response hours plus 3 nonresponse hours) and 1209 annual responses (1199 responses plus 10 nonresponses) to the OMB information collection 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.**

Analysis methods are described below for each data collection activity in this submission:

**State SNAP Agency Survey.** For closed-ended survey questions, the project team will conduct

<sup>5</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB.pdf>

descriptive analysis in Stata, calculating frequencies and means. State’s individual responses to the survey will be cross-checked against other available documents for that State. If necessary, the project team will follow-up with States by phone if there are any outstanding questions.

**Case Studies: Site Visits.** The project team will conduct qualitative analyses of case study data using NVivo or another qualitative software program. They will build a structure for organizing and coding the data to facilitate efficient analysis. Before the start of data collection, the project team will apply an initial set of codes to each data collection tool identifying the topic covered. The codes will also align with the notes template to streamline the initial coding and organization of all site visit interview notes. The coding scheme will become more detailed over the course of data analysis to identify subtopics and emerging themes, but the core set of codes will remain consistent. The project team will identify themes to discuss how each State is granting exemptions from work requirements and good cause determinations and the level of consistency within and across States.

**Case Studies: Administrative Data Analysis.** The project team will prepare the data to create analytic constructs from raw variables, aggregating individual-level data to create household-level analysis, geocoding observations, and linking administrative data with extant data sources. All analyses will be State-specific and will include unweighted descriptive statistics on variables of interest and cross-tabulations to illustrate variability in exemptions from work requirements and good cause determinations. The table below shows the schedule for data collection, analysis, and reporting.

| 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                  | 6-9 months after OMB approval   |
| Collect Administrative Data          | 1 month after OMB approval      |
| Code and process data                | 1-5 months after OMB approval   |
| Analyze data and prepare reports     | 6-14 months after OMB approval  |
| Prepare data files and documentation | 14-19 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.**

All data collection instruments will display the OMB approval number and expiration date.

**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.