**Appendix D1**

**Staff interview guide**

Evaluation of Child Support Cooperation Requirements in SNAP

**STAFF interview GUIDE:
State and Local SNAP and child support staff**

Introduction

My name is \_\_\_\_\_\_\_\_ and I’m a researcher at a company called [Mathematica/MEF] Associates. Under Legal Authority Public Law, 115-334, we are conducting a congressionally mandated study of child support cooperation requirements for the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture. This study examines the implementation experience of States that currently or formerly require(d) cooperation with child support as a condition of SNAP eligibility, and the feasibility of implementing child support cooperation requirements among States considering adopting this option. I want to start by thanking you for taking time to speak with us today. Your perspective and insights will be very helpful to the study.

We are interested in understanding the processes and procedures for [considering] implementing cooperation requirements [and the motivation for considering adopting cooperation requirements]. We also want to explore what conditions [would] make cooperation requirements easier or more challenging to implement as well as how cooperation requirements [may have affected/could affect] your SNAP and child support caseloads.

My colleagues and I are currently visiting State and local SNAP offices and child support offices here and in 11 other States to collect information about child support cooperation requirements from a wide range of stakeholders.

This research will help the government better understand the effect of child support cooperation requirements on individuals and families. There are no known risks to your participation. I want to let you know that your participation in this study is voluntary, and your responses will be kept private, except as required by law. We will not share the information you provide with anyone outside the study team. You may refuse to answer any question, and you may stop the discussion at any time. There will no penalties if you refuse to participate in part or at all.

We will take notes over the course of the interview and would like to audio record the conversation so we can remember the information we collect. We will use this information in our report to FNS to describe States’ experiences with cooperation requirements. The reports might list the names of States that contributed information, but we will not quote you or anyone by name or title. However, because of the relatively small number of SNAP and child support offices participating in the study, there is a possibility a response could be attributed correctly to you.

**Public Burden Statement**

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0584-xxxx. The time required to complete this information collection is estimated up to 90 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reducing this burden, to the following address: U.S. Department of Agriculture, Food and Nutrition Services, Office of Policy Support, 1320 Braddock Place, Alexandria, VA 22314, ATTN: PRA (0584-xxxx). Do not return the completed form to this address.

I expect our discussion will take about [90 minutes for direct service staff; 60 minutes for all other respondents]. First, do you have any questions for me about the project in general or what we will be discussing today? And finally, do I have your permission to record our discussion? [Confirm permission before recording starts.]

1. **Respondent background**
2. What is your official job title or position?
3. How long have you held this position?
4. What are your primary responsibilities?
5. **Motivation and initial planning/implementation**
6. In your opinion, what was the primary motivation for requiring cooperation with child support as a condition of SNAP eligibility?  What were the primary reasons for supporting the adoption of a cooperation requirement?
7. To your knowledge, has legislation to require cooperation with child support been introduced in the past but failed to be adopted? What factors do you attribute to its [lack of] successful passage?
8. Who supported adopting the cooperation requirement? For example, the Governor, a state legislator or group of legislators, or constituency group, outside entities?
9. Before the State legislation to require child support cooperation in SNAP was enacted, was there much discussion or debate about adopting the cooperation requirement?

Probes:

* What were the major concerns about and/or arguments against adopting the requirement? Were there any people or groups who were opposed to the requirement?
* What were the primary reasons for opposing the cooperation requirement?
* To what extent did SNAP and child support agency staff provide input or were otherwise engaged? What role(s) did they play?
1. Once the cooperation requirement legislation was enacted, what key policy decisions still had to be made?

Probes:

* For example, who would be subject to the requirement (i.e., custodial parents, relative caretakers/non-relative caretakers, noncustodial parents), or documentation required to establish a good cause exemption?
* What factors led to the policy features that were ultimately adopted?
1. Please describe the planning process that was undertaken prior to implementing the cooperation requirement.
2. How many months before the “effective date” did your agency have to plan for the implementation of the cooperation requirement?
3. Who was involved in the planning process? What was their role? How was communication structured and what did it involve?
	1. What types of state and local child support and SNAP agency staff at the state level were involved? Any vendor representatives or other outside contractors? Other stakeholders?

7. How was the cooperation requirement rolled out? For example, county by county or statewide? By type of case, such as new applicants versus ongoing cases or cases in which the applicant receives other assistance?

1. What were the key reasons behind rolling out the cooperation requirement in the way that you did? Were other strategies considered?

8. Please describe key activities that were carried out to support the implementation of the cooperation requirement.

a. Were additional staff hired?

1. [IF YES] Please describe how many staff were added and what tasks related to implementing the cooperation requirement they handle. What were the additional staffing costs?
2. [IF NO] How was additional work associated with having the cooperation requirement in place absorbed by existing staff? Did this constitute a significant increase in their workload?

b. What cooperation policies were especially complicated or challenging to develop and provide guidance on?

1. To what extent were the cooperation requirement policies intentionally designed to align with your State’s TANF program child support cooperation requirement policies? With Medicaid and subsidized child care cooperation requirement policies?
2. Were there any SNAP/child support policies or regulations (for example, case processing timeframes) that presented challenges for the other agency? How did you address these?

c. What types of staff training were provided? Was there any cross-training for child support and SNAP staff?

d. What types of outreach was conducted to inform SNAP recipients, advocacy groups, and the public at large?

9. What systems changes were required to enable data or information sharing?

1. What types of data systems are involved in the process?
2. Were any changes needed to the SNAP eligibility system/ child support system to: track SNAP participation or verify and track child support cooperation requirement status, sanctions, good cause exemptions, notifications, other notable changes (for example, increasing frequency of sharing information through automated interface, adding additional flags for workers)?
3. What agreements for data use were required to begin transferring and sharing information? What did these entail and about how long did it take to establish these agreements?

10. What were the key planning and implementation challenges? What issues required the most time and attention to work through and resolve?

1. Were the necessary partners involved in planning? In retrospect, were there partners or groups that you think should have been involved, or more involved, at different points in the planning process?
2. Did you have access to data that was needed to plan for implementation? What types of information did you lack that would have been useful?

Probe:

* Were you able to estimate the number of SNAP participants that might be affected by the cooperation requirement?
* Were you able to estimate the proportion of SNAP participants already engaged with child support?
1. How many months did you have to plan for implementation before the cooperation requirement went into effect? Did you feel this was enough time?
2. Were there any cross-agency communication challenges? What were they and how were they addressed?
	1. [IF STATE CHILD SUPPORT AND SNAP ARE HOUSED IN SAME AGENCY] In what ways did/does having the SNAP and child support agencies housed within the same administrative agency facilitate or impede implementation of the cooperation requirement in SNAP?
	2. [IF STATE CHILD SUPPORT AND SNAP ARE HOUSED IN DIFFERENT AGENCIES] In what ways did/does having the SNAP and child support programs housed in different administrative agencies facilitate or impede implementation of the cooperation requirement in SNAP?
3. What were the major data system-related challenges related to implementing the cooperation requirement process? Facilitators? What would have made it easier to set up?
	1. Were there any system compatibility problems? Have you overcome them or do some problems remain?
	2. Were there any challenges in establishing DUA agreements? How did you overcome them?

11.What factors helped make the initial planning and implementation of the cooperation requirement successful?

12. What additional costs and resources were associated with designing and implementing the cooperation requirement?

1. Costs associated with developing and making automated system modifications and upgrades?
2. Costs associated with developing new policies, outreach and notification of policy changes?
3. Costs associated with training staff on policy changes and new procedures? Hiring new staff?
4. Other costs (for example, printing costs)?

13. [For formerly implementing States onlY] Now, I’d like to hear more about the key factors that led to your State’s decision to drop the cooperation requirement. What was the primary reason for dropping the requirement?

* 1. Who supported dropping the requirement? Who opposed dropping it?
	2. What was the role of the child support agency and the SNAP agency in discussions or debate about dropping the requirement?

14. [For formerly implementing States onlY] What did the process of dropping the requirement involve?

1. Was legislative action required?
2. Was the policy ended at one point in time or phased out? [IF PHASED OUT] How long did this phase out take?
3. How was dropping the requirement coordinated between the child support and SNAP agencies? What did this involve?
4. How was the change in policy communicated to child support and SNAP staff?
5. How was the change in policy communicated to participants?
6. What data system changes had to be made?

15. [For formerly implementing States onlY] Do you think that [STATE] will reinstate the cooperation requirement for SNAP participants in the future? Why or why not?

1. **Cooperation requirement: key policy features**

The primary respondents for this section are state and local SNAP and child support directors and their policy staff.

1. The study team has reviewed the documentation regarding the cooperation policy that [State] formerly had/currently has/is currently considering. I’d like to confirm that my understanding of the policy/proposed legislation accurate. (Interviewer: Summarize the policy relating to 1a-g and ask for any corrections or clarifications):

1. Who is required to cooperate
2. What a participant must do to comply with the requirements if they (1) need paternity established, (2) an order established, (3) child support collected
3. At what point a participant is supposed to take initial step/action to demonstrate they are cooperating with the child support agency
4. What constitutes noncooperation, the process for determining noncompliance, how a sanction can be removed (often referred to “lifted” or “cured”)
5. Good cause exemption criteria, information needed to provide a claim for good cause, good cause verification process
6. [IF APPLICABLE] Differences in policy for noncustodial parents versus custodial parents (including relative caretaker/non-relative caretaker)
7. [IF APPLICABLE] Use of comparable disqualification (CD) policy and differences/similarities between cooperation requirement and CD policies
8. How is child support income handled in calculating SNAP benefits? How are child support payments by the noncustodial parent handled in calculating SNAP benefits?
9. [IF APPLICABLE] Was child support paid by noncustodial parents or received by custodial parents treated differently when [STATE] had a cooperation requirement? How so? Why was this policy changed?

2. [Note to interviewer: For front-line staff, skip this question; the process will be covered in much more detail in Section D and the process mapping exercise.] So far, we have discussed the child support cooperation requirement policies. Now I’d like to ask you to provide a high-level overview of how these cooperation requirement policies are put into practice. Please walk me through key points in the general process, starting with how the State SNAP agency determines if an applicant is subject to the cooperation requirement.

 Probes:

1. Notify the child support agency that a SNAP applicant/participant is subject to the cooperation requirement
2. Inform the participant about what they need to do
3. Track the status of the participant’s cooperation status
4. Determine if the participant has failed to meet the cooperation requirement and impose a sanction
5. Communicate information about the case to the other agency
6. Communicate information about how to come into compliance if sanctioned and end disqualification
	* + 1. Are you familiar with child support cooperation requirements that are applied by programs, such as TANF?
				1. [IF YES] To your knowledge, how is the cooperation requirement for SNAP participants similar or different from cooperation requirements for TANF participants?
				2. [IF APPLICABLE] Please describe whether and how the cooperation requirement for SNAP participants is similar or different from cooperation requirements for Medicaid and/or child care participants.

Probes:

* Who is required to cooperate, what constitutes cooperation, what is the consequence for noncooperation,good cause exemption criteria and information needed to provide a claim for good cause?
1. In what ways has the degree to which cooperation requirements are aligned (or not aligned) across these programs facilitated implementation of the cooperation requirement in SNAP?
2. Have there been any significant changes to the State’s cooperation requirement policies? What changed and why? Approximately when did the change(s) go into effect?
3. How much variation is there at the local level in cooperation requirement policies? For which types of policies (for example, good cause)? How much variation is there at the local level in the procedures and processes used to implement cooperation requirement policies?
4. Please describe any effect of the cooperation requirement on the SNAP/child support caseload. For example, was there a drop in SNAP applications after the cooperation policy was implemented? Was there a significant number of disqualifications after the cooperation policy was implemented? Was there an increase in child support applications after the cooperation policy was implemented? Any other notable changes or trends?
5. **Ongoing implementation of the child support cooperation requirement**

INTERVIEWER: The primary respondents for this section are front-line child support and SNAP workers, including front-line supervisors. if cooperation requirment applies to noncustodial parents and custodial parents, focus first on custodial parents and then noncustodial parentS and Relative Caretakers/non-relative caretakers. [For state level child support and SNAP directors and policy staff, skip to D2.]

D1. Local level implementation of child support cooperation requirement

*Identification*

1. Can you first provide a general description of the SNAP application process? How do individuals typically complete applications (for example, in-person, on-line, phone)?

1. Do SNAP workers also determine eligibility for any other assistance programs (for example, TANF)? Does the State use a combined application?

2. When during the application process do staff determine that an applicant is subject to the cooperation requirement?

a. What criteria do SNAP workers use to determine that an applicant is subject to the cooperation requirement? Is there a standard set of questions?

b. Does the SNAP automated system automatically identify individuals that need to cooperate?

3. When must applicants verify cooperation with child support?

a. What is the process for verifying cooperation at application?

b. Does SNAP track the cases subject to the cooperation requirement that are referred to child support? Does the child support agency track referrals received from SNAP?

4. How are disputes resolved if a client disputes a system match?

5. How are disputes resolved if the child support program assesses that the referral is unnecessary or inappropriate?

6. What is the process for checking cooperation status at recertification?

a. Are there other points in time other than application and recertification in which child support cooperation status is checked?

b. How does the process vary by whether the application was made in-person, phone or on-line?

7. What happens if a SNAP participant already has an open child support case?

1. How would the SNAP worker identify or verify that an applicant has an open child support case? Is that information provided electronically or manually?
2. How does this process vary for participants receiving this information during a recertification interview?
3. How does this process vary for participants who are also participating in TANF?

*NOTIFICATION*

1. Can you describe how the child support program is notified that a SNAP participant is subject to the cooperation requirement?

1. Does the SNAP system send an automated notice to the child support system?
2. Does a SNAP worker send an email or other type of electronic notification to the child support office?
3. Are notifications sent in batches or individually as referrals occur?
4. What is the typical amount of time between when a participant is identified as being subject to the cooperation requirement and when the child support agency is notified?

2. How and when are participants informed that they are subject to the cooperation requirement by the SNAP agency?

3. What information do SNAP participants receive about the cooperation requirement?[Interviewer: obtain copies of all written materials provided to applicants if not already collected during pre-visit planning]

a. What are participants told they must do? For example, what steps they need to take, whether they need to initiate contact with the child support agency or if they wait for someone from the child support office to contact them?

b. What aspects of the cooperation requirement do SNAP participants have difficulty understanding or executing?

*COOPERATION ESTABLISHMENT*

1. Once the child support agency has been notified, how are these cases initially processed?

1. How are staff assigned to work these cases?
2. What aspects of the process are automated and what are handled manually?

2. What steps does the child support program take to engage with the SNAP applicant/participant and open a child support case?

1. What aspects of the process are automated and what are handled manually?

3. To what extent are cases referred from SNAP handled or worked differently than other child support cases?

4. What do the child support staff tell SNAP participants about the criteria for being considered “in cooperation” with child support or for good cause exemptions?

*5.* How does the process vary for SNAP cases that already have an open child support case versus those that do not?

6. What information about a participants’ [SNAP/child support] case or changes in the case status that could affect cooperation status is communicated to [SNAP/child support]? Please describe when this communication occurs and how quickly communication is made.

*NONCOOPERATION*

Next, let’s talk about the process for determining noncooperation, imposing sanctions for noncooperation, and how information about noncooperation and sanctions is communicated between SNAP and child support and to participants.

[In States with a cooperation requirement for noncustodial parents] We’ll focus first custodial parents and then discuss noncustodial parents.

1. What are the most common reasons that participants don’t meet the cooperation requirement?
2. To what extent does [CHILD SUPPORT AGENCY] work with participants before making a determination regarding their cooperation status. For example, if a participant misses a meeting or doesn’t respond to a request for information, are they offered additional opportunities to reschedule or turn paperwork in?
3. What happens when it is determined that a SNAP participant is not meeting the child support cooperation requirement?
	1. How is the SNAP program informed of noncooperation? Are notices of noncooperation automated through an electronic interface? Manual?
	2. What is the timeframe in which the SNAP program must be informed of noncooperation?
4. How are participants informed that they are not cooperating?
5. Does the SNAP program send notices to the applicant/participant?
6. Are notifications sent manually or through an automated process?
7. What information do the notices contain? Do they specify what the participant must do to avoid being sanctioned?
8. What happens if the participant does not respond to the notice? How many notices would be sent before applying the sanction?

5. What is your process for assessing or confirming that noncooperation is not the result of a situation that might qualify for a good cause exemption?

* 1. How long do participants have to respond to the notice?
	2. How does this differ for current SNAP participants versus new SNAP applicants?

6. What steps must participants take to come into compliance and be determined as meeting the cooperation requirement?

1. How do participants initiate this process? What must they do before the sanction can be lifted (sometimes referred to as “cured” or “lifted”)?
2. How long does it typically take for a sanction to get lifted (for example, can benefits be reinstated within the same month in which the person comes into compliance)? Does it vary by the number of times they have been determined to be in noncompliance?
3. Who makes this determination? How is this information communicated between the SNAP agency and the child support agency? How are front-line works notified or able to access this information?
4. How are participants notified that the sanction has been lifted?
5. Are there specified timeframes within which participants must take required steps to demonstrate cooperation? Please describe.

7. How do the noncooperation policies and processes just described differ for noncustodial parents? For relative caretakers/non-relative caretakers?

a. To meet the requirement, do noncustodial parents have to pay the full amount of their child support obligation? Does the regularity of their payments factor into determining whether they are meeting the requirement?

b. Does the noncustodial parent’s employment status (for example, if they are unemployed or underemployed) factor into determining whether they are meeting the requirement?

*GOOD CAUSE*

Next, I’d like to turn to the policies and practices for good cause exemptions.

1. What are SNAP applicants informed about good cause exemptions and what they would need to do to make a good cause claim?
2. Good cause exemptions are fairly uncommon. Why do you think this is?
3. Can good cause be claimed at any point during the application process and ongoing benefit receipt?
4. How long does the participant have to prove good cause?
5. What happens to the status of their SNAP benefit while the participant is compiling evidence for good cause? Are there any challenges with verifying and establishing good cause within application processing timeframes? Please describe.
6. What are the responsibilities of the child support program and the SNAP program for informing participants about good cause, handling good cause claims, making good cause determinations?

4. How do child support and SNAP agencies share information with each other on the status of cases that are seeking to establish good cause? If good cause is established, how is this communicated between the SNAP and child support program?

*5.*  In your opinion, do participants find the good cause exemption criteria and process easy or difficult? What factors account for that? What questions do participants have about good cause? Are there any common misconceptions about good cause? Please describe.

6. What are the most common reasons for good cause exemptions that are requested? Are there certain good cause reasons that are more difficult to receive exemptions for? Are there certain requests that are more likely to be denied?

7. Do request for good cause exemptions typically get approved or denied? What are the most common reasons for denying good cause claims?

8. Does good cause need to be re-established at different points? How frequently and under what circumstances?

D2. Alignment of cooperation requirement policies across assistance programs

1. To what extent do the child support cooperation requirement policies and procedures in SNAP align with cooperation requirement policies and procedures in TANF? [IF APPLICABLE] Medicaid and/or subsidized child care? Where do the policies differ?

Probes:

* Who is required to cooperate, what constitutes cooperation, what is the consequence for noncooperation,good cause exemption criteria and information needed to provide a claim for good cause?

2. In what ways has the degree to which cooperation requirements are aligned (or not aligned) across these programs facilitated/created challenges for applying the requirement in SNAP? Please describe.

D3. Implementation supports and challenges

1. Thinking about all that is involved in administering the cooperation requirement, can you describe how smoothly you think the implementation process works in practice?
	1. What policies and practices facilitate and/or impede smooth implementation?
	2. What supports would enhance implementation? (For example, automated data system upgrades to facilitate shared interfaces between child support and SNAP or additional staff.)
	3. What additional costs would these supports require?
	4. What are the barriers to obtaining these supports? (For example, lack of staff resources and/or data system capacity, policy misalignment.)
	5. How does local area variation in practice and procedures improve the implementation of the cooperation requirement or make it more challenging?
2. What aspects of implementing cooperation requirements in your State work well? Please describe what works well and why.

Probes:

* Identification and notification process for participants subject to requirement
* Communication between SNAP and child support (specify at which points in process)
* Automated interface and exchange of data
* Applicants are well informed about what they are required to do
* Staff have a good understanding of the cooperation requirement policy and processes/procedures
1. What parts of implementing the cooperation requirement in your State is challenging? What contributes to these challenges?

Probes:

* Identification and notification process for participants subject to requirement?
* Inappropriate referrals or case closures?
* Communication between SNAP and child support; where in the process are there glitches or breakdowns in communication?
* Automated interface and exchange of data (or lack of automated interface); what continues to present challenges for the systems to interface smoothly and effectively?
* Applicants are not well informed about what they are required to do; which aspects typically applicants appear to find confusing?
* Staff do not have a good understanding of the cooperation requirement policy and processes/procedures?
* Ability to share and receive information regarding referrals and cooperation status to meet specified application and case processing timeframes.
1. What are the critical systems a State should have in place to effectively and efficiently implement cooperation requirements?
2. What aspects of the cooperation requirement are the most confusing or challenging for participants?
* Probe for differences by whether the participant is a custodial parent versus noncustodial parent; custodial parent versus custodial caretaker, relative caretakers versus nonrelative caretakers
1. How do you think informing applicants and participants about the cooperation requirement could be improved?
2. What, if any, aspects of the cooperation requirement cause confusion for staff?
3. What additional supports would make implementation of the cooperation requirement easier?

Probes: For example, more staff, enhanced data system capabilities, additional training for staff, stronger partnerships between child support/SNAP

1. What are the costs associated with these additional resources?
2. Have there been any significant changes your cooperation requirement policy?
3. What changed and why?
4. Approximately when did the change(s) go into effect?
5. What was the effect or impact of the change(s)?

[For States considering implementing A child support cooperation requirement] Now I’d like to talk about what resources, data, or other supports you think will be necessary to implement cooperation requirement smoothly and effectively.

1. What additional resources and supports do you think you would need in place to be able to implement cooperation requirements?
2. Have you considered whether you would need more staff?
	1. [IF YES] How many additional staff? What type of work would they be responsible for? What type of training would they need to receive? What do you estimate would be the additional staff/labor and training costs?
	2. [IF NO] How would work associated with implementing cooperation requirements be absorbed by current staff?
3. What types of changes do you think would need to be made to your data system?
	1. Do you have any estimates for how much it would cost to make these system modifications?

c. Has your agency ever worked and coordinated with the [SNAP AGENCY/CHILD SUPPORT AGENCY] before?

i. What do you think would facilitate or impede forming or strengthening your and capacity to partner together to implement the requirement?

1. **Conclusion**
2. [FOR STATES THAT CURRENTLY OR USED TO HAVE COOPERATION REQUIREMENT] Based on your experience with implementing the cooperation requirement in the SNAP program, do you have any advice or lessons learned for states that are considering implementing this requirement in SNAP?
3. [FOR STATES THAT ARE CONSIDERING COOPERATION REQUIREMENTS] What types of information about child support cooperation requirements would you find useful if [STATE] continues to consider implementing this requirement?
4. What do you think [are/would be] the most important benefits of having a child support cooperation requirement in SNAP? What do you think are the most significant drawbacks?
5. Is there anything else you want to tell me about your thoughts and experiences with the cooperation requirements for SNAP participants before we finish?

Thank you for your time. Here is my contact information should you have any additional questions or concerns about the study.

[INTERVIEWER: PROVIDE RESPONDENT WRITTEN COPY OF YOUR CONTACT INFORMATION, INCLUDING NAME, TITLE, ORGANIZATION, PHONE, EMAIL ADDRESS]

**Privacy Act Statement**

**Authority:** This information is being collected under the authority of Section 9 of the Food and Nutrition Act of 2008, as amended, (7 U.S.C. 2018). Disclosure of the information is voluntary.

**Purpose:** The information is being collected to evaluate Child Support Cooperation Requirements in United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP).

**Routine Use:** The information may be shared with SNAP contract researchers and USDA SNAP research and administrative staff.

**Disclosure:** Disclosure of the information is voluntary. If all or any part of the information is not provided, interviews may not be admissible in data sets.

The Systems of Records Notices relevant to this collection are FNS-8 FNS Studies and Reports located at https://www.govinfo.gov/content/pkg/FR-1991-04-25/pdf/FR-1991-04-25.pdf and FNS-10 Persons Doing Business with the Food and Nutrition Service (FNS) located at https://www.federalregister.gov/documents/2000/03/31/00-8005/privacy-act-proposed-new-system-of-records.