

SUPPORTING STATEMENT - PART B for

OMB Control Number 0584-[NEW]:

Assessing SNAP Participants' Fitness for Work

June 2022

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B.1 Respondent Universe and Sampling Methods

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

This is a new information collection request and includes a web survey of all 53 State SNAP agencies¹ (Appendix B) as well as case studies of four States. The case studies involve in-person site visits to all four states (Appendices C-H) and administrative data analysis (Appendix I).

Survey of State SNAP Agencies. Since there is no existing detailed information on how States and territories decide to exempt participants from work requirements due to physical or mental limitations, the project team is proposing a complete census of all State SNAP agencies and will not conduct any sampling. For each agency's response, the project team has estimated that the State SNAP Director and up to three additional staff will contribute to the response, for a total of 212 respondents. The response rate for this data collection activity is expected to be 100%, with efforts to maximize response rates discussed in B.3.

Case Studies: Site Visits. Site visits to four States will allow the project team to explore 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. The respondent universe consists of 53 State or territory SNAP agencies. FNS will select four States purposively for site visits and include as many as two backup States. If a State SNAP Director does not agree to participate, no other staff in the State will be approached or interviewed. FNS will select and recruit States for the study that have diversity in terms of geography, county or State administration, mandatory or voluntary E&T participation, and labor market characteristics. The site visits include semi-structured interviews with State and local SNAP administrators, eligibility staff, and SNAP E&T provider staff, as well as

¹ Includes all 50 States, the District of Columbia, the United States Virgin Islands, and Guam

observations. The project team will work with a State contact to schedule interviews with local administrators and eligibility workers in each office, as well as with staff at E&T providers at a time that is convenient for them. The project team expects that all staff will agree to participate in the interviews. The site visits will also include observations of staff-participant interactions during eligibility interviews. The project team will work with the State contact and local office staff to identify opportunities for observations of eligibility interviews. FNS expects that approximately 20 percent of individuals/households applying for or participating in SNAP who are invited to participate in the observation will choose not to participate, for a response rate of 80 percent.

Case Studies: Administrative Data Analysis. The project team expects that all four States that agree to participate in the case studies will provide the administrative data to conduct analyses to explore patterns in exemptions from work requirements due to physical or mental limitations. The project team will request data from administrative SNAP case records on the demographic characteristics and select income sources of all individuals in all active SNAP cases and, for individuals ages 16 or older, their work registration history, indicators for whether they are a mandatory or voluntary E&T participant (if there is an indicator in the State system), and exemptions from work requirements and good cause determinations.

Respondents. The total number of unique respondents is 400. Members of the public affected by the data collection include State and local governments, business and not-for-profit agencies administering the SNAP E&T programs, and individuals. The table below shows the respondent universe, sample size, and expected response rate for each respondent type.

Respondent Type/Data Collection		Total To Be Contacted	Expected Number of Respondents	Expected Number of Nonrespondents	Expected Response Rate
Survey of State SNAP Agencies					
State and Local Government	State/territory SNAP director/administrator	53	53	0	100%
	State/territory SNAP policy staff	159	159	0	100%
Case Studies: Site Visit					
State and local government	State/territory SNAP director/administrator	6	4	2	67%
	State/territory SNAP policy staff	24	24	0	100%

Business or other for-profit	Local office SNAP director/administrator	8	8	0	100%
	Local office SNAP supervisor	8	8	0	100%
	Local office SNAP frontline staff	64	64	0	100%
	SNAP E&T provider director	4	4	0	100%
	SNAP E&T provider supervisors	4	4	0	100%
	SNAP E&T provider frontline staff	32	32	0	100%
Nonprofit	SNAP E&T provider director	4	4	0	100%
	SNAP E&T provider supervisors	4	4	0	100%
	SNAP E&T provider frontline staff	32	32	0	100%
Individuals	SNAP applicants	30	24	6	80%
Case Studies: Administrative Data Analysis					
State and local government	State/territory SNAP data staff	4	4	0	100%
Total		408	400	8	98%

*The State/territory site visit respondents are a subset of the people who will respond to the survey. The same State and local government frontline staff will participate in both the interviews and observations.

B.2 Procedures for the Collection of Information

Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

Survey of State SNAP Agencies. The project team will not conduct sampling, as the survey will be a census of all 53 State SNAP agencies. FNS will email the State SNAP directors alerting them to the survey effort and then the project team will email all State SNAP Directors with a link to the survey. The survey will be programmed in Qualtrics, an online survey platform that is FedRamp certified and allows staff to share the link so multiple staff can contribute to a single response. The introduction to the survey will contain a description of each module so that staff best suited to answer a given module can navigate to that module directly. The project team will field the survey over a four-month period, reserving the last month of the fielding period for conducting the survey over the phone with States who have yet to respond. The project team will monitor weekly the number of completed surveys, the number of partially completed surveys, and the number of surveys with no response. They will conduct random spot-checking weekly to confirm the survey instrument is functioning appropriately and to assess issues with

missing data. If there is an issue with the data quality for a given State, the project team will follow-up with them by phone to discuss. States' individual survey responses will be cross-checked against other available documents for that State.

Case Studies: Site Visits. The project team will conduct three-day site visits to the four case study States, asking the State SNAP Director to designate a point person who can coordinate the visit, including identifying priority regions within reasonable travel distance of the State capital to visit and identifying contacts in each county or local office. The project team will work with the contact to develop an efficient approach to scheduling the visits. The project team will record the interviews as well as take detailed notes while on site and will use a template for organizing the notes from the interviews, which will also facilitate analysis of the site visit data. The project team member primarily responsible for notes will compile, organize, and clean all notes immediately following the site visit. The other project team member will then review all notes for completeness and accuracy.

Case Studies: Administrative Data Analysis. The project team will request administrative case records data for a consecutive three-month period in 2022 that roughly coincides with the site visit data collection. This will enable the triangulation of the qualitative and quantitative data to present a cohesive story about how States grant exemptions from work requirements and make good cause determinations. In addition, collecting data in 2022 minimizes the risk that the information reflects temporary operations implemented to address the COVID-19 pandemic. 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 by factors such as mode of the eligibility interview, SNAP worker characteristics, and characteristics of the SNAP participant (gender or race/ethnicity) or their community (urbanicity). The project team did not plan for significance testing given the unknowns such as sample sizes and other statistical factors, but will consider significance testing if conditions are appropriate

Unusual problems requiring specialized sampling procedures. Because it is a census of all State

SNAP programs, the study has no unusual problems requiring specialized sampling procedures.

Periodic data collection cycles to reduce burden. The study only has one cycle of data collection.

B.3 Methods to Maximize the Response Rates and to Deal with Nonresponse

Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield "reliable" data that can be generalized to the universe studied.

Survey of State SNAP Agencies. To maximize response rates, the project team will take preemptive steps and conduct ongoing outreach. To start, FNS will alert all SNAP agencies about the study and the survey (Appendix L). Once the survey is ready to launch, the project team will email all State SNAP Directors with a link to the survey (Appendix M). The survey will be fielded over a four-month period. After sending the initial email with the survey link, the project team will follow up with all 53 State SNAP Directors every two weeks throughout the first three months of the fielding period. Follow-up emails will be tailored based on each State's progress on the survey (Appendices O-R). In addition, the project team will rely on behavioral science principles to prompt response. All emails will be personalized to the State SNAP Director and will contain subject lines containing a specific ask to prompt respondents to open the invitation. The emails will also come from a dedicated email address to avoid spam filters and streamline communication. In the fourth month of the fielding period, the project team will email all non-respondents one final time encouraging them to complete the survey, including an offer to schedule a time to conduct the questionnaire over the phone (Appendix S).

Case Studies. To maximize response rates for the case studies, FNS will send an email (Appendix T) to the State SNAP Director, along with the project description, highlighting the importance and goals of the study. FNS will notify the regional offices that the study team will reach out to the selected States. Following that, the project team will contact the four selected States to determine their interest in participating in the case study and to schedule an initial call (Appendix U, N). On these calls, the project team will explain the purpose of the study, explain what participating entails, explain the benefits of

participating, and determine their interest. The project team will be clear in these initial conversations about the ways they will attempt to minimize the burden on State programs and individual staff.

B.4 Test of Procedures or Methods to be Undertaken

Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The project team has tested all data collection instruments with fewer than 10 respondents. The steps taken are outlined below:

Survey of State SNAP Agencies. The project team pretested the survey with state staff in Utah and Colorado to assess comprehension of the questions, determine the overall length of the survey, and highlight any missing topics. A memorandum outlining the results of the pretest is included in Appendix V.

Case Study: Site Visits. The project team piloted all interview protocols with Washington state. The project team asked the respondent to provide feedback in real-time on unclear questions, as well as to participate in a short debrief after the call for feedback on flow, clarity, length of time involved, and suggestions to reduce burden for the respondent while maintaining data quality. The interview protocols were then revised based on this feedback.

Case Studies: Administrative Data Analysis. The project team will ask each State to send a test file with one month of data (see Appendix I for a list of data elements the team will request). Upon receiving files from States, the project team will assess the quality of the data. The project team will iterate with the State via calls and emails on the issues identified in the test file until they receive a test file that reflects expectations for the quality and completeness of the final files submitted for analysis.

B.5 Individuals Consulted on Statistical Aspects & Individuals Collecting and/or Analyzing Data

Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

- Eric Williams, Social Science Research Analyst, USDA, FNS, 703-305-2460
- Mary Farrell, Executive Vice President, MEF Associates, 703-838-2723
- Kimberly Foley, Senior Research Associate, MEF Associates, 206-653-0169
- Riley Webster, Research Analyst, MEF Associates, 571-312-2033
- Eunice Yau, Research Assistant, MEF Associates, 703-838-2724
- Jackie Kauff, Principal Researcher, Mathematica, 202-484-5266
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