

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-[NEW]:

Understanding States' SNAP Customer Service Strategies Study

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Table of Contents

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY.....4
A2. PURPOSE AND USE OF THE INFORMATION.....5
A3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....8
A4. EFFORTS TO IDENTIFY DUPLICATION.....9
A5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....9
A6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....10
A7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINES OF 5 CFR 1320.5.....10
**A8. COMMENTS TO THE FEDERAL REGISTER NOTICE AND EFFORTS FOR CONSULTATION.
.....11**
A9. EXPLAIN ANY DECISIONS TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS.....11
A10. ASSURANCES OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....11
A11. JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE.....12
A12. ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION.....12
A13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN.....18
A14. PROVIDE ESTIMATES OF ANNUALIZED COST TO THE FEDERAL GOVERNMENT.....18
A15. EXPLANATION OF PROGRAM CHANGES OR ADJUSTMENTS.....19
A16. PLANS FOR TABULATION, AND PUBLICATION AND PROJECT TIME SCHEDULE.....19
A17. DISPLAYING THE OMB APPROVAL EXPIRATION DATE.....21
A18. EXCEPTIONS TO THE CERTIFICATION STATEMENT IDENTIFIED IN ITEM 19.....22

ATTACHMENTS

ATTACHMENT A: STATUTES AND REGULATIONS

ATTACHMENT B: STUDY DESIGN AND REFERENCES

ATTACHMENT C: LITERATURE REVIEW

ATTACHMENT D: CASE STUDY STATE SELECTION MEMO

ATTACHMENT E: RECRUITMENT MATERIALS

Attachment E.1: Letter of Introduction from FNS

Attachment E.2: Initial Email to States

Attachment E.3: Understanding States' SNAP Customer Service Strategies

Attachment E.4: State Recruitment Call Script

Attachment E.5: Email confirming State participation

ATTACHMENT F: INSTRUMENTS AND PROCEDURES

Attachment F.1: Combined Interview Protocol

Attachment F.2: Observation Guide

Attachment F.3: Site Visit Introduction Email

Attachment F.4: Site Visit Background & Sample Agenda

ATTACHMENT G: PUBLIC COMMENTS AND FNS RESPONSES

Attachment G.1: Public Comment #1 - APHSA

ATTACHMENT H: ESTIMATED BURDEN HOURS AND COST OF RESPONDENT BURDEN

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 study comprises a new data collection request. This OMB Package is for planned data collection activities during 2024. It will provide Food and Nutrition Service (FNS) with a greater understanding of how States define and measure customer service in the Supplemental Nutrition Assistance Program (SNAP), particularly those that go beyond the minimum requirements set by FNS. The study will draw on existing aggregated statistics on SNAP Quality Control (QC) data (e.g., timeliness and error rates)¹; a literature review; discussions with FNS Regional and National office staff and SNAP policy experts; and site visits to State and local SNAP programs where interviews and observations will be conducted.

The Food and Nutrition Act of 2008, as amended through P.L. 113–128, enacted July 22, 2014 [7 U.S.C. 2026], provides the legislative authority for the U.S. Department of Agriculture (USDA) FNS to administer the Supplemental Nutrition Assistance Program (SNAP). Section 17 of the Food and Nutrition Act of 2008 provides authority to FNS to conduct research to help improve the administration and effectiveness of SNAP. These statutes are included in **Attachment A**.

Providing high quality customer service is an important, but understudied factor in the success of SNAP. Administrating SNAP requires repeated contacts between SNAP agency staff (State and local) and customers, from initial application to case closure. The numerous interactions along this journey affect applicants' and customers' experiences and perceptions about the program. Poor customer service at any point could impact an applicant or participant's access to the program. Examples of disrupted access have been profiled in media reports and prompted lawsuits (Marimow 2017, Valdivia 2022). Providing effective customer

¹ Current burden inventories related to QC data collection are found in OMB-0584-0074, Expiration Date: 07/30/2025; 0584-0299, Expiration Date: 07/31/2023, and 0584-0303, Expiration Date: 1/31/2024.

service in SNAP is therefore paramount to supporting FNS's mission to increase food security and reduce hunger.

Despite its importance, little current, systematic information is available about how State agencies support customer service in SNAP or how they monitor it. FNS collects key metrics related to customer service, including application processing timeliness and the accuracy of eligibility and benefit determination. These measure essential aspects of administering SNAP, but they do not directly measure important aspects of customer service, such as the quantity or quality of client interactions or customer or staff satisfaction. This is the first study commissioned by FNS on the topic of customer service and will provide the agency with important information about how States define, measure, and improve customer service in administration of SNAP.

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.

The information collected will be used to address three objectives and their associated research questions:

1. Describe how each study State defines and measures good and/or bad customer service for SNAP applicants and participants, particularly those that go beyond the minimum requirements set by FNS.
2. For each study State, describe how the State SNAP agency implements and refines its customer service approach.
3. Describe the current research and documentation available about customer service standards and measurement broadly, with a particular focus on government programs and safety net programs.

See **Attachment B: Study Design and References** for the associated research questions and

more detail on the study design.

To explore these research questions and objectives, four main research methods will be utilized: a comprehensive literature review; a document and data systems review; interviews with SNAP staff and stakeholders; and observations of staff interactions with customer service systems.

The literature review was conducted early in the study (**Attachment C**) to help frame customer service practices and highlight research findings for program outcomes related to customer service components. The document and data systems review built off of these findings, and served as the basis to develop a state selection index that includes States' SNAP structure, approaches to customer service, indicators of program performance, and the FNS Region.

The States proposed for inclusion in the study were selected, using a non-statistical approach that analyzed a range of criteria. First, the study team identified metrics that may indicate the quality of service customers receive. The indicators for quality of service include a reduction in the overall payment error rate² (from FY17-FY19), improved application processing timeliness (from FY18-FY19), participation rates, and case and procedural error rates (CAPER)³ below the national average for FY19.

Second, the study team identified a variety of practices around customer service approaches and monitoring that included:

- 1) Improving Application Accessibility: practices which make the application process more accessible to more customers.
- 2) Modernizing SNAP Local Offices: physical or process modifications that make SNAP offices more welcoming or effective.

² Payment error rate is a key indicator of payment accuracy, measuring a state's ability to determine a household's eligibility for SNAP and issue benefits in the correct amount.

³ Case and procedural error rates are the measurement of negative case reviews in the SNAP Quality Control process.

- 3) Upholding Call Standards: practices that allow agencies to provide high quality phone services.
- 4) Customer Service Surveys: the collection of customer input about services.
- 5) Customer Service Staff Training and Standards: how an agency supports its employees in providing good customer service.
- 6) Refining Customer Communications: modifications on how customers communicate with the agency and how the agency communicates with customers.

Third, study States were selected to vary in how the program is administered (either at the State level or the county level). Fourth, States were selected to represent all FNS geographic regions. (See *Case Study State Selection Memo*, **Attachment D**).

One week after OMB approval, the research team will start State recruitment activities to set up a site visit with up to 9 States to conduct in-person interviews with SNAP staff and partner organizations that conduct SNAP outreach. The research team will contact nine States that match the criteria set above to recruit them to participate in the study: Alabama, California, Illinois, Massachusetts, Pennsylvania, South Dakota, Utah, Washington, and Wisconsin (See *Recruitment Materials*, **Attachment E**). Five alternate States will be considered for inclusion in the case that any of the primary States decline to participate in the study. If a State opts out, it will be replaced with an alternative State that matches its key selection criteria.

A two-day site visit to the State will be conducted two to six months after OMB approval. The research team will collect information using the *Interview Protocol (Instruments and Procedures)*, **Attachment F** tailored for interviews with SNAP staff at the State and local levels (e.g., county level staff). The research team will also conduct interviews with key partner staff, such as from food banks and other food security organizations, who interface with frontline SNAP staff and participants.

Interviews with local- and frontline-level staff will cover basic information about local process and customer service policy and guidance; related training on customer service; measurement of customer service; employee wellness, satisfaction, culture, and incentives; funding; customer service surveys and related methods of collecting customer feedback; technology used for customer service; and best practices. Also, while on-site, the research team will observe SNAP staff interacting with their client management software and ask them questions about ease of use and pain points for efficient customer service.

Interviews with respondents who work with SNAP applicants or participants as advocates, ombudspersons, or at partner organizations will focus on how these partners measure customer service, and what evidence they have gathered about key pain points for customers in accessing the program, especially those that have resulted in formal complaints.

Information shared with any other organizations inside or outside USDA or the government.

FNS plans to post the final report with detailed findings on the FNS intranet and website.

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.

FNS seeks to comply with the E-Government Act of 2002, which promotes the use of technology to reduce respondent burden.

Data collection for the study will not employ information technology. Instead, data will be collected in person, by trained and experienced researchers conducting interviews using semi-structured protocols. The study team will draw on extant data wherever possible to address the research objectives (such as examining existing application processing timeliness and error rates) and topics covered during site visit interviews will be restricted to topics that

require richer qualitative data and to obtain information not available in extant sources.

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.

There is no similar ongoing data collection being conducted that duplicates the efforts of the proposed data collection for the study. Every effort will be made to avoid duplication of data collection efforts. While there have been studies of particular aspects of customer service in SNAP (such as automation of data processing and updated communication strategies), there have been no previous studies that focused on customer service comprehensively in SNAP.

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.

There are 9 small entities involved in this data collection. Partner organizations, often that are small community based-organizations (CBOs), are integral partners to providing access and improving customer service in SNAP. The study's interview protocol (**Attachment F**) has been designed to impose minimal burden on all organizations involved. The information being requested during interviews has been held to the absolute minimum required for the intended use. Each interview will be scheduled at a time that is convenient to the respondent and last an average of one hour.

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 one-time voluntary data collection activity. Customer service is an important aspect of ensuring access to the program for vulnerable populations, including non-English

speakers, families with young children, elderly individuals, and people with disabilities. As stated in Section 17 [7 U.S.C. 2026] FNS may “undertake research that will help improve the administration and effectiveness of the supplemental nutrition assistance program in delivering nutrition-related benefits”. This study enables FNS to fulfill SNAP’s mission as described in the Food and Nutrition Act “to safeguard the health and well-being of the Nation’s population by raising levels of nutrition among low-income households”.

If this information is not collected, FNS will continue to lack understanding of how States define, measure, and improve customer service in administration of SNAP. As a result, FNS will be limited in its ability to provide guidance to States on how they can improve SNAP customer service.

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 that would cause this information collection to be conducted in a manner inconsistent with 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and efforts for consultation.

On April 26, 2023, a 60-Day Federal Register Notice was published at 88 FR 25358. One comment was received and responded to. See **Attachment G** for the Public Comments and FNS' Responses.

The following individuals were consulted outside the agency.

1. Dorothy R. and Alicia H., Center on Budget and Policy Priorities, provided comments on the process and possible criteria to use for State selection for the study.
2. Eleanor D., Director of Government Innovation, and Francesca C., Director of Food Assistance, Code for America, provided comments on the process and possible criteria to use for State selection for the study.
3. Leslie W., Director of Vermont's Food and Nutrition Program, provided comments on the interview protocol for the study, including on the clarity of questions.

All comments from the individuals listed above were addressed or taken into consideration, as appropriate.

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.

Payments or gifts will not be provided to respondents in this study.

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.

FNS complies with the Privacy Act of 1974. FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19078–19080, that discusses the terms of protections that will be provided to respondents.

The information provided during the staff interviews is protected in accordance with 42 U.S.C. 1306, 20 CFR 401 and 422, 5 U.S.C. 552 (Freedom of Information Act) 5 U.S.C. 552a (Privacy Act of 1974) and OMB Circular No. A-130.

The FNS Privacy Office reviewed this OMB package and had no comments or concerns. Privacy Officer Michael Bjorkman reviewed this OMB package on April 11, 2023 without comment.

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.

The research team will not be asking questions of a sensitive nature. However, a part of the interview guide focuses on equity and customer experiences of under resourced communities. In this regard, SPR will comply with OMB standards when asking respondents questions about race or ethnicity.

FNS Privacy Officer Michael Bjorkman reviewed this OMB package on April 11, 2023 without comment.

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.

This is a new data collection with an estimated burden of 144.6 hours distributed among 116 total respondents (113 who are considered responsive and 3 who are considered non-responsive) engaging in 252 total “responses” (249 from respondents and 3 from non-

respondents). These estimates and the parameters used to calculate them are shown in **Table 1** and **Attachment H: Estimated Burden Hours and Cost of Respondent Burden**.

Table 1 breaks down the burden into sections for “business not-for-profit” and “State, local & tribal SNAP agency staff.” Within each group, the burden estimate includes time taken by non-participants who consider participation and decline as well as by those who ultimately participate in the study. Below we describe the parameters (sample sizes, etc.) that are the basis for calculating the burden for each of the two groups in more detail.

Calculating burden for business not-for-profit: FNS estimates that 9 non-profit organizations conducting SNAP outreach will spend 15 minutes each in a recruitment call, out of a total of 9 contacted to participate in the study. FNS estimates that 9 non-profit community-based organizations will then participate in one hour-long interview out of a total of the 9 that completed recruitment calls. In sum, this means that there is an estimated sample size of 18 respondents (one staff member contacted for recruitment and one staff member responding to the interview from 9 organizations), a respondent number of 18 (one staff member contacted for recruitment and one staff member responding to the interview from 9 organizations), and a non-respondent number of zero.

Calculating burden for State, local, & Tribal SNAP and partner agency staff: Four categories of government staff members will participate in the study (State SNAP directors, State SNAP staff members, County and Tribal Government and call center SNAP Directors, and County and Tribal SNAP Staff). FNS considers the State SNAP directors to be gatekeepers for SNAP staff member study participation in any given State. FNS estimates that once a State SNAP director approves his or her State’s participation in the study, all other State and local SNAP staff members will agree to participate. Therefore, their participation may be mandatory. In these burden calculations, FNS accounts for the time of State SNAP directors who decline to participate.

FNS estimates that out of 12 State SNAP directors recruited for the study, 9 State SNAP directors will participate. The estimated number of responses for these 9 State government SNAP directors is two. Twelve State SNAP directors will spend approximately 3 minutes reading a letter of introduction from FNS, 3 minutes reading a study description, and 12 minutes reading and responding to a recruitment email. Nine of them will spend 30 minutes each in a recruitment call with the research team, and 3 minutes reading an email confirming their participation. Nine of them will take part in a site visit planning call lasting 15 minutes and an interview lasting approximately one hour. To avoid double counting, State SNAP directors are only counted once in sample size and respondent calculations.

FNS estimates that State SNAP administrative staff members will participate four times. Of the 18 State SNAP administrative staff members participating across all States in the study, FNS estimates that 18 will spend about 30 minutes in a recruitment call with the study team, 15 minutes in a site visit planning call, 45 minutes planning the site visit, and one hour participating in interviews. FNS estimates that 14 County and Tribal Government and call center SNAP Directors contacted across all the participating states will participate 3 times. FNS estimates that 14 will participate for 15 minutes in a site visit planning call, 45 minutes planning the site visit, and one hour participating in interviews. Lastly, out of the 54 County and Tribal SNAP Staff contacted across all the participating states, FNS estimates that 27 will spend one hour participating in interviews and 27 will spend 30 minutes participating in observations.

In sum, this means that there is:

- an estimated sample size of 116 (12 State SNAP directors, 18 State SNAP administrative staff members, 14 County and Tribal Government and call center SNAP Directors, 54 County and Tribal SNAP Staff, and 18 staff at Organizations conducting SNAP outreach)

- an estimated respondent number of 113 (9 State SNAP directors, 18 State SNAP administrative staff members, 14 County and Tribal Government and call center SNAP Directors, 54 County and Tribal SNAP Staff, and 18 staff at Organizations conducting SNAP outreach); and
- an estimated non-respondent number of 3 (3 State SNAP directors).

To estimate the burden for nonrespondent State SNAP directors, we included time to respond to the study team’s initial inquiry about participation.

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

Table 1 also shows the estimated annualized cost to the respondents (including those considered responsive and nonresponsive) for the hours of burden for this data collection.

The total monetized burden estimate for data collection from staff members of organizations conducting SNAP outreach is \$371.37. That is the total estimated hours of burden for this data collection (11.25) multiplied by the average hourly wage⁴ and fringe benefits cost for counselors, social workers, and other community and social service specialists (\$24.82; Bureau of Labor Statistics, 2023).

The total monetized burden estimate for data collection from State, local, and tribal agency staff members is \$5,158.92. This sum represents the total estimated burden for four categories of staff. To estimate the burden for State SNAP directors and County and Tribal Government and call center SNAP Directors, we multiplied the number of hours estimated for these categories by the average hourly wages and fringe benefits cost for social and community service managers (\$38.13). To estimate the burden for State SNAP staff and County and Tribal Government and call center SNAP staff, we multiplied the number of

⁴ Bureau of Labor Statistics, U.S. Department of Labor, *Occupational Employment and Wage Statistics*, [accessed August 22, 2023] [www.bls.gov/oes/].

hours estimated for these categories by the average hourly wages and fringe benefits cost for (\$24.05; See Table 1 for wages and hours totals from the Bureau of Labor Statistics, 2023).

The total monetized cost burden for the entire data collection is \$5,530.29.

Table 1: Estimated Burden Hours and Cost of Respondent Burden

ATTACHMENT H: ESTIMATED BURDEN HOURS AND COST OF RESPONDENT BURDEN

OMB Control Number 0584-[NEW]:

		RESPONDENTS						NON-RESPONDENTS						COSTS			
Respondent Description	Activity	Sample Size	Estimated Number of Respondents	Frequency of Response (Annually)	Total Annual Responses	Average Hours per Response	Subtotal Estimated Annual Burden (Hours)	Estimated Number of Non-Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (Hours)	Subtotal Estimated Annual Burden (Hours)	Grand Total Burden Estimate	Hourly Wage Rate*	Fringe benefits	Estimated Total Annual Cost to Respondents	
BUSINESS NOT-FOR PROFIT																	
Organizations conducting SNAP outreach	Site visit: Recruitment (Attachment F.3)	9.0	9.0	1.0	9.0	0.25	2.3	0.0	0.0	0.0	0.0	0.0	2.3	\$24.82	\$8.19	\$74.27	
Organizations conducting SNAP outreach	Site visit: Semi-structured interviews (Attachment F.1)	9.0	9.0	1.0	9.0	1.0	9.0	0.0	0.0	0.0	0.0	0.0	9.0	\$24.82	\$8.19	\$297.10	
Subtotal Business-not-for Profit		18.0	18.0	1.0	18.0	0.63	11.25	0.0	0.0	0.0	0.0	0.0	1.25¹			\$371.37	
STATE, LOCAL & TRIBAL SNAP STAFF																	
Agency SNAP Directors	Site visit: Recruitment letter of introduction (Attach	12.0	9.0	1.0	9.0	0.05	0.45	3.0	1.0	3.0	0.05	0.15	0.60	\$38.13	\$12.58	\$30.43	

	ment E.1)																
Agency SNAP Director s	Site visit: Recruit ment email (Attach ment E.2)	12.0	9.0	1.0	9.0	0.20	1.80	3.0	1.0	3.0	0.20	0.60	2.40	\$38 .13	\$12. 58	\$121.71	
Agency SNAP Director s	Site visit: Recruit ment study descript ion (Attach ment E.3)	12.0	9.0	1.0	9.0	0.05	0.45	3.0	1.0	3.0	0.05	0.15	0.60	\$38 .13	\$12. 58	\$30.43	
Agency SNAP Director s	Site visit: Recruit ment call (Attach ment E.4)	12.0	9.0	1.0	9.0	0.50	4.50	3.0	0.0	0.0	0.00	0.00	4.50	\$38 .13	\$12. 58	\$228.21	
Agency SNAP Director s	Site visit: Recruit ment (Attach ment E.5)	12.0	9.0	1.0	9.0	0.05	0.45	3.0	0.0	0.0	0.00	0.00	0.45	\$38 .13	\$12. 58	\$22.82	
Agency SNAP Director s	Site visit: Semi- structur ed intervie ws (Attach ment F. 1)	9.0	9.0	1.0	9.0	1.0	9.0	0.0	0.0	0.0	0.0	0.0	9.00	\$38 .13	\$12. 58	\$456.42	
Agency SNAP Director	Site visit: Plannin	9.0	9.0	1.0	9.0	0.25	2.25	0.0	0.0	0.0	0.0	0.0	2.25	\$38 .13	\$12. 58	\$114.10	

s	g call (Attachment F.3)															
State SNAP Staff	Site visit: Recruitment call (Attachment E.4)	18.0	18.0	1.0	18.0	0.5	9.0	0.0	0.0	0.0	0.0	0.0	9.0	\$24.05	\$7.94	\$287.88
State SNAP Staff	Site visit: Semi-structured interviews (Attachment F.1)	18.0	18.0	1.0	18.0	1.0	18.0	0.0	0.0	0.0	0.0	0.0	18.0	\$24.05	\$7.94	\$575.76
State SNAP Staff	Site visit: Planning call (Attachment F.3)	18.0	18.0	1.0	18.0	0.25	4.5	0.0	0.0	0.0	0.0	0.0	4.5	\$24.05	\$7.94	\$143.94
State SNAP Staff	Site visit: Planning (Attachment F.4)	18.0	18.0	1.0	18.0	0.75	13.5	0.0	0.0	0.0	0.0	0.0	13.5	\$24.05	\$7.94	\$431.82
County and Tribal Government and call center SNAP Directors	Site visit: Semi-structured interviews (Attachment F.1)	14.0	14.0	1.0	14.0	1.0	14.0	0.0	0.0	0.0	0.0	0.0	14.0	\$38.13	\$12.58	\$709.98
County and	Site visit:	14.0	14.0	1.0	14.0	0.25	3.5	0.0	0.0	0.0	0.0	0.0	3.5	\$38.13	\$12.58	\$177.50

Tribal Government and call center SNAP Directors	Planning call (Attachment F.3)																
County and Tribal Government and call center SNAP Directors	Site visit: Planning (Attachment F.4)	14.0	14.0	1.0	14.0	0.75	10.5	0.0	0.0	0.0	0.0	0.0	10.5	\$38.13	\$12.58	\$532.49	
County and Tribal SNAP Staff	Site visit: Semi-structured interviews (Attachment F.1)	27.0	27.0	1.0	27.0	1.0	27.0	0.0	0.0	0.0	0.0	0.0	27.0	\$24.05	\$7.94	\$863.64	
County and Tribal SNAP Staff	Site visit: Observations (Attachment F.2)	27.0	27.0	1.0	27.0	0.5	13.5	0.0	0.0	0.0	0.0	0.0	13.5	\$24.05	\$7.94	\$431.82	
Subtotal State and Local		98.0	95.0	2.4	231.0	0.57	132.4	3.0	1.0	3.0	0.3	0.9	133.3			\$5,158.92	
GRAND TOTAL		116.0	113.0	1.7	249.0	0.60	143.7	3.0	1.0	3.0	0.3	0.9	144.6	-		\$5,530.29	

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.

There are no capital/start-up or ongoing operation/maintenance costs 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 total annual contract cost to the Federal Government is \$214,970.30, over three years. The contract cost to the Federal Government is a fixed price award, valued at \$644,910.90. This total includes costs associated with the study design, instrument development, recruitment and selection of States, data collection, data analysis, reporting, and presentation/publication of the results. Of the total cost (\$644,910.90), approximately \$199,131.38 will be used for data collection and analysis. This includes \$127,501.14 for site visits; and \$71,630.24 for transcriptions, data analysis and reporting to FNS on its collection.

This information collection also assumes the cost of FNS employees which is estimated to be \$160,425.36, inclusive of fringe benefit costs. This cost was calculated as follows:

- The FNS employee, Social Science Analyst, involved in project oversight which is estimated at GS-13, step 1 at \$71.62 per hour based on 2,080 hours per year and including fringe benefit costs. We anticipate this person will work 520 hours per year for 3 years for a combined total of 1,560 hours. The total cost for the FNS Social Science Analyst is

\$111,727.20.

- The FNS employee, Program Analyst, involved in providing expert subject matter guidance to the project which is estimated at GS-13, step 1 at \$71.62 per hour based on 2,080 hours per year and including fringe benefit costs. We anticipate this person will work 60 hours per year for 3 years for a combined total of 180 hours. The total cost for the FNS Policy Analyst is \$12,891.60.
- The FNS employee, Branch Chief, involved in project oversight with the study is estimated at GS-14, Step 2 at \$87.46 per hour based on 2,080 hours per year and including fringe benefit costs. We anticipate this person will work 120 hours per year for 3 years for a combined total of 360 hours. The total cost for the FNS Branch Chief is \$31,485.60.
- The FNS employees, Regional Office SNAP Directors (7), involved in recruiting States for the study is estimated at GS – 15, Step 2 at \$102.88 per hour based on 2,080 hours per year and including fringe benefit costs. We anticipate these persons will work 2 hours per year for 3 years for a combined total of 42 hours. The total cost for the Regional Office SNAP Directors is \$4,320.96.

Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2023 for the Washington, DC, locality.

The total cost (contract + FNS costs) is \$805,336.26, for an average annual cost of \$268,445.42, over three years.

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 request and will add 144 burden hours and 252 total annual responses to OMB's 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.

After completing the site visits, we will analyze the data collected to (1) explore how each case study State defines and measures good and/or bad customer service for SNAP applicants and participants; and (2) describe how the State SNAP agency implements and refines its customer service approach. We will organize the evidence from each data source, including interviews, observations, and documents, to ensure that findings depend on mutually confirming lines of evidence. The site visit teams will upload their finalized site visit notes into an NVivo database, organized by discussion guide question, which the study team will then use for analysis. If we identify any holes in the data during this process, the site visit team will follow up with respondents by telephone or email to ensure data accuracy and completeness.

Data will be analyzed using content analysis based on the study framework, where themes will be identified, coded, and linked to capture the diverse views of study participants. A code book will be created to guide the coding of data to ensure uniformity among multiple coders. The basic structure of the code book will mirror the study's conceptual scheme (strategy, operations, funding, etc.), but new codes will be created as data are sorted and categorized. Data will be analyzed across States as well as by other defining characteristics (e.g., geographic characteristics). This analysis will inform our update to the study framework and identification of best practices in SNAP customer service.

Our team will prepare and submit a report to FNS, in draft, revised draft, and final versions. This final report will address the research objectives as described in the final study plan and will present our finalized conceptual model that FNS and State agencies can use to

analyze, monitor, and improve SNAP customer service initiatives and processes. In addition to short case studies of each of the nine States, the report will also include a summary of State practices derived from a cross-site analysis of the data collected from the nine States that will include lessons learned and best practices, remaining knowledge gaps, and recommendations for future efforts to strengthen customer service practices in SNAP.

Time Schedule for the Entire Project

Weekly reports will be submitted about state recruitment beginning one month after OMB approval, expected to be from May through July 2024. Weekly reports will be submitted about site visit data collection progress, expected to be from July through December 2024. A summary memo on site visit data collection will be submitted in December 2024. Findings will be synthesized and presented in the evaluation’s draft final report in March 2025. The Final Report will be organized by study objectives, and it will draw on findings from the study components separately and in combination to address the research questions. The report will be written for a broad, non-technical audience with more detailed technical appendices. Table 2 outlines the schedule for data collection and reporting.

Table 2: Study Schedule

Activity	Expected Date
Recruit States	1 week after OMB approval to 10 weeks after OMB approval
Train site visit researchers	1 month after OMB approval
Conduct case study site visits	2 months after OMB approval – December, 2024
Data collection case study memorandum	December 2024
Draft Final Report	March 2025
Final 508-Compliant Report	May 2025

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.

FNS will display the expiration date of OMB approval and OMB approval number on all instruments associated with this information collection, including forms and questionnaires.

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."

No exceptions are necessary for this information collection. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.