

SUPPORTING STATEMENT–PART A

OMB Control Number 0584-[NEW]

How Have SNAP State Agencies Shifted Operations in the Aftermath of COVID-19? Study

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Contents

A1.	Circumstances that make the collection of information necessary.....	1
A2.	Purpose and use of the information.....	3
A3.	Use of information technology and burden reduction.....	5
A4.	Efforts to identify duplication.....	6
A5.	Impacts on small businesses or other small entities.....	6
A6.	Consequences of collecting the information less frequently.....	6
A7.	Special circumstances relating to the Guidelines of 5 CFR 1320.5.....	7
A8.	Comments to the <i>Federal Register</i> notice and efforts for consultation.....	7
A9.	Explain any decisions to provide any payment or gift to respondents.....	8
A10.	Assurances of confidentiality provided to respondents.....	8
A11.	Justification for any questions of a sensitive nature.....	9
A12.	Estimates of the hour burden of the collection of information.....	9
A13.	Estimates of other total annual cost burden.....	14
A14.	Provide estimates of annualized cost to the Federal government.....	14
A15.	Explanation of program changes or adjustments.....	14
A16.	Plans for tabulation, and publication and project time schedule.....	14
A17.	Displaying the OMB Approval Expiration Date.....	16
A18.	Exceptions to the certification statement identified in Item 19.....	17

Appendices

- A. Legal Authority: Food and Nutrition Act of 2008–Section 17
- B. SNAP agency survey instrument and document request
- C. SNAP agency case study discussion guide
- D. Survey screenshots
- E. Pre-test revisions
- F.1 Federal Register Comment 1
- F.2 Federal Register Comment 2
- F.3 Federal Register Comment 3
- G.1 FNS Response to Federal Register Comment 1
- G.2 FNS Response to Federal Register Comment 2
- G.3 FNS Response to Federal Register Comment 3
- H. Confidentiality pledge
- I. Burden Table
- J.1 Template for email from FNS to State SNAP agency about the survey
- J.2 Template for email from Mathematica to State SNAP agency about the survey
- J.3 Template for email from Mathematica to newly assigned respondents about the survey
- J.4 Template for document reminder email for the survey
- J.5 Template for biweekly reminder email for SNAP administrators about the survey
- J.6 Template for biweekly reminder email for section respondents about the survey
- J.7 Urgent reminder email for SNAP administrator about the survey
- J.8 Urgent reminder email for respondents about the survey
- J.9 Survey reminder call script
- K.1 Template for email from FNS to State SNAP agency about the case studies
- K.2 Template for email from Mathematica to State SNAP agency about the case studies
- K.3 Template for scheduling reminder email to State SNAP agency for the case studies
- K.4 Case study call script
- L. Administrative data element lists
- M. Study description
- N. NASS comments
- O. IRB approval letter

A1. Circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new, one-time data collection. The Food and Nutrition Service (FNS), part of the U.S. Department of Agriculture (USDA), is authorized to collect these data under Section 17 of the Food and Nutrition Act of 2008.¹ The act authorizes the secretary of the USDA to contract with private institutions to undertake research that will help improve the administration and effectiveness of the Supplemental Nutrition Assistance Program (SNAP) in delivering nutrition-related benefits (Appendix A). As the cornerstone of the nation's nutrition safety net, SNAP provides monthly benefits to households with low incomes to reduce food insecurity and improve health and well-being. The COVID-19 pandemic and its economic fallout created extraordinary challenges for SNAP and the broader safety net as whole. To keep processing applications and issuing benefits, SNAP agencies had to adapt their core operations and deliver services primarily or entirely virtually. Drawing on new and existing waivers and policy options in this uncharted environment required a host of complicated decisions and choices on the part of State SNAP agencies. The How Have SNAP State Agencies Shifted Operations in the Aftermath of COVID-19? (SNAP COVID) study will provide FNS with a comprehensive picture of how State SNAP agencies responded to the pandemic, including their decision-making processes and experiences with program changes in the short and long terms, and how these experiences have prepared States for major disruptions in the future. It is necessary to collect this information so FNS will have more information about how States had to shift operations to respond to the COVID-19 pandemic and contribute to larger discussions about better preparedness for future public health emergencies.

The study will involve a survey of 53 SNAP State agencies² and case studies in five States. For the case studies, State and local-level SNAP staff will participate in in-depth interviews, and State SNAP IT staff will provide administrative data.

This information collection request includes two data collection instruments: (1) a SNAP agency survey

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

² The study will include the 50 States and Washington D.C., Guam, and the U.S. Virgin Islands.

instrument (Appendix B) and (2) a discussion guide for SNAP agency case studies (Appendix C).

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 SNAP COVID study will provide FNS with insights about State SNAP agencies' experiences with the wide range and mix of operational changes made in response to the COVID-19 pandemic. The primary research objectives of this study are to (1) describe States' approaches to staffing before COVID-19 and after the Federal public health emergency ends; (2) describe States' approaches to use of technology before COVID-19 and after the Federal public health emergency ends; (3) describe States' decision-making processes for changing policies and operations after the Federal public health emergency ends; and (4) describe lessons States learned during COVID-19 that could inform SNAP operations under normal circumstances and help SNAP prepare for future public health or other emergencies that disrupt normal operating procedures. The findings of this study will be summarized in two issue briefs and a report. The findings from the study will also be used to help FNS inform continued program improvement and increased preparedness for any future disruptions that affect service delivery. The findings will also provide States with valuable information on what States changed in response to the public health emergency.

From whom and how the information will be collected. To address these objectives, the study will gather information from all 53 State SNAP agencies via a web-based survey and create case studies of five States through interviews and review of their administrative data. The web survey will ask respondents to provide extant documents to confirm and clarify survey responses and to inform the development of instruments for the interviews. In Table A-1, we provide an overview of the data collection instruments, number of potential respondents, method of collection, and purpose. Participation in the study and each data collection effort is voluntary. Information on data collection processes appears in Supporting Statement Part B.

The survey will include the 53 State SNAP agencies; there are no eligibility criteria for recruitment. The main point of contact for the survey will be the 53 SNAP State administrators, who can designate as many

as three staff members to complete relevant sections of the survey. The survey will include mostly close-ended questions but will include a few open-ended responses. In addition, the survey will ask question about various documentation they may be able to send the study team. These documents include: 1) State guidance, policy, or informational documents related to operating SNAP during the public health emergency; 2) State guidance, policy, or informational documents related to the public health emergency policies and/or operations that have been sustained, revised, or dropped; 3) Informational documents that describe staffing changes made during or as a result of the public health emergency (e.g., information about office closures, changes in the days or hours of operation, etc.); 4) Training materials for frontline staff related to providing SNAP services during the public health emergency; 5) Procedural instructions and/or manuals related to operating during the public health emergency; and, 6) Documents related to making technology updates (for example, change requests, contracts, design documents, etc.) during the public health emergency. The study team will ask the States if they can send the documentation by email to the study helpdesk, however, the States will be provided access to a secure file transfer site if that is their preference.

States will be encouraged to complete the survey via the web; however, they will also be offered the option of completing the survey by phone with an interviewer or using a fillable pdf. FNS will email State SNAP directors to describe the study (Appendix J.1) and then separately email them an introduction email (Appendix J.2) with the survey link and a study description attached (Appendix M) from the vendor. If needed, the vendor will email the State SNAP State director designees an introductory email (Appendix J.3) with the survey link and a study description attached (Appendix M). State SNAP directors and their designees will also receive biweekly and urgent reminder emails from the vendor (Appendices J.5, J.6, J.7, and J.8). In addition, starting in Week 6, SNAP directors and their designees will receive reminder phone calls (Appendix J.9). Lastly, State SNAP directors and their designees will receive reminders about the document collection (Appendix J.4).

FNS will select the five States to participate in the case studies in consultation with the vendor (details about how these States will be selected is described in part B.1.). The State SNAP directors will receive

an initial email from FNS notifying them about the case studies (Appendix K.1). After that, the study team will email to introduce them to the case studies and ask to schedule a call to discuss the case studies (Appendix K.2). State SNAP directors who do not respond to this initial email will receive a reminder email (Appendix K.3). The State SNAP director will then participate in a one-hour call to discuss the case study (Appendix K.4). Each case study will involve interviews with SNAP administrators and staff. For interviews with local level staff, we will identify local areas in consultation with State SNAP directors and FNS. Potential criteria for selection may include urbanicity, county- versus State-administered organization, areas that experienced varied effects of the pandemic or associated economic recession, or local areas that made particularly innovative or major changes in response to the pandemic. The interviews will involve a total of five State SNAP agency directors, 20 State SNAP policy and operations staff, five State SNAP data staff, five State SNAP IT staff, 10 local SNAP agency directors, 15 local SNAP agency supervisors, and 15 local SNAP agency frontline staff. The virtual interviews will mimic in-person site visits. Two study team members will conduct the interviews using Webex. We will use the Webex capabilities to use videoconferencing, when possible, record each interview with the respondent's consent, and download transcripts. In April 2023, the study team pre-tested the data collection instruments for these interviews. We explained the of pre-test findings in detail in a memorandum (Appendix E).

The study team will also request administrative data from the five case study States. The team will combine individual-level application data, recertification data and applicant and participant demographic characteristics with aggregate data on application, recertification, and caseload trends, benefit issuance timeliness and error rates; and call center metrics to explore SNAP agency operational changes during the COVID-19 public health emergency (the full list of requested data elements is in Appendix L). For States that have all the data available, the team will analyze the data for trends in application acceptance and denial rates, benefit amounts, recertification rates, recertification churn rates, benefit timeliness, and call center operations. The study team will also conduct subgroup analyses to explore whether overarching trends in these measures vary by race and ethnicity, age, household size, urban or rural location, those

with earned or unearned income, language, disability, and other relevant characteristics. When only partial data are available, or if States cannot provide case-level information, the team will use aggregate data to analyze as many of these patterns as possible.

Table A-1. Overview of data collection activities

Instrument	Affected public	Respondent type	Method of collection	Length	Purpose
SNAP State agency web survey pretest (Appendix B)	State government	3 State SNAP directors	Paper survey and telephone debrief on pretest	45 minutes (survey pretest); 60 minutes pretest debrief)	The web survey pre-test will assess question clarity, response burden, and the effectiveness of the delivery method and, identify whether specific items, question structure, or question order can negatively affect data quality.
SNAP State agency web survey (Appendix B)	State government	53 State SNAP directors	Web survey with option to complete by fillable PDF form or telephone	25 minutes	The web survey will gather information about the 53 SNAP State agencies' adaptations to staffing, technology, and use of waiver and other flexibilities during the federal public health emergency. The survey contains a request for States to submit documents related to their adaptations during the federal public health emergency.
		106 SNAP State policy and operations staff	Web survey with option to complete by fillable PDF form or telephone	45 minutes (for the overall survey)	
		53 SNAP IT staff	Web survey with option to complete by fillable PDF form or telephone	5 minutes	
SNAP agency case study discussion guide pretest (Appendix C)	State and local government	1 State SNAP directors	Virtual interviews	60 minutes	The discussion guide pre-test will ensure respondents understood the phrasing and content of the questions and to determine the need to add or remove questions.
		1 State SNAP operations and policy staff member	Virtual interviews	90 minutes	
		1 local SNAP agency director			
SNAP agency case study discussion guide (Appendix C)	State and local government	5 State SNAP directors	Virtual interviews	90 minutes	The discussion guide will help the study team understand States' decision-making processes, how agencies implemented operational changes in practice, and lessons learned. The State SNAP director interviews will last 90 minutes because we expect they will have the most to share in terms of change at the State level and involvement in decision making
		20 SNAP State policy and operations staff	Virtual interviews	60 minutes	
		5 SNAP State data	Virtual interviews	60 minutes	

Instrument	Affected public	Respondent type	Method of collection	Length	Purpose
		staff			processes.
		5 SNAP State IT staff	Virtual interviews and administrative data reporting	20 hours	
		10 local SNAP agency directors	Virtual interviews	90 minutes	These interviews at the local level will give us insight into the differential effects of changes across a range of geographic areas and populations. We estimated the interviews for the frontline staff will take longer because there will be more than one respondent per interview to gain a range of perspectives.
		15 local SNAP agency frontline staff	Virtual interviews	90 minutes	
		15 local SNAP agency supervisors	Virtual interviews	90 minutes	

SNAP=Supplemental Nutrition Assistance Program

Frequency of information collected. The survey and case studies will be completed once in 2024 through 2025. Data collection will span about 13 months.

A3. Use of information technology and burden reduction. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

In compliance with the E-Government Act of 2002, the study team has incorporated information technology into its data collection process to reduce respondents’ burden. The team will field the survey of SNAP agencies over the web (Appendix D) but will offer alternative options to complete the survey by phone or as a fillable PDF form. If a respondent chooses to complete the survey by phone, a trained interviewer will reduce data entry burden by entering the responses through the web survey platform. The team will further reduce burden by programming skips for nonapplicable questions in all modes. For surveys administered by web or phone, pre-filling information from earlier questions will eliminate the need for duplicate questions. Edit checks will improve data quality for web and phone completions and streamline the process of data retrieval, cleaning, and coding. The study team estimates that it will collect about 80 percent of the total survey responses by web at <https://www.notyetcreated@mathematica->

mpr.com. The study team will collection information for the case studies mainly through virtual interviews. To reduce the burden of these interviews, the study team will use the data submitted in the survey to help tailor the discussion guide.

A4. Efforts to identify duplication. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

The information collection will not duplicate information already available. After reviewing USDA reporting requirements, reporting requirements for State administrative agency, and special studies by other government and private agencies, FNS concluded that no existing data sources can provide the data needed to answer the study's research questions.

A5. Impacts on small businesses or other small entities. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This data collection does not affect small businesses or other small entities.

A6. Consequences of collecting the information less frequently. Describe the consequence to Federal program or policy activities if the collection is not conducted, or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

This is a voluntary, one-time data collection that will provide needed information on how States have adapted their operations in response to the COVID-19 pandemic. Without this effort, FNS will not be able to identify lessons learned during the pandemic to inform continued program improvement and increased preparedness for any future disruptions that affect service delivery.

A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- Requiring respondents to report information to the agency more often than quarterly;
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Requiring respondents to submit more than an original and two copies of any document;
- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;

- That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register notice and efforts for consultation. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

1. A notice was published in the *Federal Register* on April 26, 2023 (volume 88, pages 25362-25369). FNS received 3 comments on this proposed information collection. [The first comment that was received from Jean Public indicated that SNAP should be ended because they thought that illegal immigrants were receiving food (Appendix F.1) and FNS responded that comments germane to the information collection will be addressed (Appendix G.1).The second comment included concerns about the study not including clients (Appendix F.2). FNS responded that including clients is beyond the scope of the current study (Appendix G.2). The third comment included 1) information about their experience about feedback on eligibility and reporting requirements, 2) concerns about the burden of pulling data, 3) a suggestion that utilizing tenured staff, employed through the pandemic would help enhance the quality, utility and clarity of the information, and 4) a concern regarding the study team using technology that would help reduce burden on their staff (Appendix F.3). FNS response included: 1) describing how all 53 State agencies will be asked to participate in the survey portion of the study and the case study will be selected based on criteria to cover States with varying

program characteristics, 2) describing how only the States selected for the case studies will be asked to pull data for the study, 3) discussing how SNAP directors will be able to assign the appropriate staff to each section of the survey and so will have the option to assign tenured staff or several staff to different sections, and 4) describing how the case study interviews will be virtual and that the research team can use Zoom or Webex based on the State’s preference.

2. The methodology was reviewed by a representative of the National Agricultural Statistics Service (NASS) Methods Division: Andy Sadler, Statistician, USDA National Agricultural Statistics Service, (comments from NASS appear in Appendix N).

FNS also consulted the following people (see Table A-2) in 2023 about the burden and other aspects of the collection as part of a pretest of the survey and case studies. As a result of the pretest, we have increased the burden of the survey from 35 minutes to 45 minutes. We also removed several questions from the survey since pretest respondents confirmed that required an unreasonable amount of coordination or time to gather the information necessary to answer them. The case study discussion guide pretest confirmed that the 90 minutes estimated was accurate. Other changes to the survey and case study discussion guides include modifying instructions and question wording and adding or removing of questions and survey response choices. The study team documented the detailed explanation of findings from the pre-tests in a memorandum, attached as Appendix E.

Table A-2. Individuals and organizations consulted

Name	Title	Agency	Phone Number
Carl Feldman	Director, Bureau of Policy	Department of Human Services	717-705-0710
Jennifer Reynolds	Program and Training Manager	Utah Department of Workforce Services	801-245-4852
Natalie Barfuss	SNAP Program Specialist	Utah Department of Workforce Services	801- 626-0248

A9. Explain any decisions to provide any payment or gift to respondents. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to respondents.

A10. Assurances of confidentiality provided to respondents. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The study team is cognizant of Federal, State, and USDA data security requirements. FNS Privacy Officer, Wilson Moorer, Acting Privacy Officer, reviewed this information collection request on August 25, 2023, and determined that the collection is not subject to the requirements of the Privacy Act.³ All study team members will comply with relevant policies related to secure data collection, data storage and access, and data dissemination and analysis. All respondents' information will be kept private and not disclosed outside the study team, except as required by law. The study team will inform survey respondents and interviewees of all planned uses of data and explain that their information will be kept private to the extent permitted by law. During the life of the project, all papers and audio recordings that contain participant names or other identifying information will be stored in secured file cabinets and rooms, and electronic data will be maintained on secured, password-protected computer servers. Only approved vendor staff will be able to access all sources of data. All vendor staff must sign a confidentiality pledge (Appendix H) to maintain the privacy of all information collected from respondents and agree not to disclose it to anyone other than authorized representatives of the study. The study team will discuss privacy matters with the interviewers during their training. The vendor will destroy all copies after transferring the data to FNS at the end of the contract. The vendor has also received institutional review board approval from Health Media Lab., Inc. (Appendix O).

A11. Justification for any questions of a sensitive nature. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This information collection includes no questions of a sensitive nature. FNS Privacy Officer, Wilson Moorer, reviewed this information collection request on August 25, 2023, and determined that the

³ A system of record notice (SORN) titled *FNS-8 USDA/FNS Studies and Reports* in the *Federal Register* on April 25, 1991, vol. 56, no. 80, pp.19078–19080 discusses the terms of protections that we will provide to respondents. Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of people against invasion of privacy. The Privacy Act also provides for the protection of records maintained by a Federal agency according to either the individual's name or some other identifier.

collection is not subject to the requirements of the Privacy Act.

A12. Estimates of the hour burden of the collection of information. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

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

Members of the public affected by the data collection include people in State and local governments. In the Burden Table (see Appendix I), we present burden estimates for this information collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden.

The time estimate in the Burden Table includes time for reading data collection materials, such as emails as well as time for responding to the data collection. The table includes both respondents and non-respondents. For the web survey, we assume that in addition to the State SNAP director, up to three additional staff may be delegated sections of the survey to complete (two SNAP operations or policy staff and one SNAP IT staff person). The total annual responses of 2,373 includes the time it will take for the State SNAP director and additional staff to complete the survey and read emails, as well as the time State-level staff take to complete the case studies. For the case studies, we anticipate needing to reach out to nine States to participate, with the goal of including five States in the case study. The Burden Table also includes the time respondents will take completing the web survey and case study pretest. No respondents will be asked to keep records of data as part of this data collection so there are no burden hours estimated for recordkeeping or third-party disclosure reporting. A summary of the burden appears in Table A-3.

Table A-3. Summary of burden

Affected public	Estimated number of respondents	Number of responses per respondent ^a	Total annual responses	Estimated total hours per response ^b	Estimated total burden (hours)
State SNAP agency director and IT/data/operations/policy staff	247	9.44	2,332	.14	327.48
Local SNAP agency director/supervisors/frontline staff	41	1.00	41	1.51	61.83
Total burden estimate ^c	288	8.24	2,373	.164	389.32

^a Number of responses per respondent = Total annual responses/Total number of respondents

^b Total hours per response = Total burden/Total annual responses

^c The summation in this row includes both respondents and nonrespondents.

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

The total base annual respondent cost is estimated to be \$23,056.31. An additional 33 percent of the estimated base annual respondent cost (\$7,608.58) must be added to represent fully loaded wages, so, the total annual respondent cost is \$30,664.89. The total cost of this information collection is calculated as the sum of the annualized costs by respondent category. For each respondent category, the annualized cost is the product of burden hours (including nonresponse burden) and an average hourly wage rate for a corresponding occupation. The team determined the wage rates for affected members of the public (see Table A-4) by using the most recently available data from the Bureau of Labor Statistics: May 2022 National Occupational Employment and Wage Estimates data.

(http://www.bls.gov/oes/current/oes_nat.htm).

Table A-4. Average hourly earnings by type of respondent

Type of respondent	Occupational category	Average hourly earnings
State or local agency director/supervisors	Management occupations (11-0000)	\$83.18
State SNAP operations and policy staff	Local government management (11-0000)	\$52.14
State SNAP IT and data staff	Computer and mathematical occupations (15-0000)	\$51.99
Local SNAP agency frontline staff	Community and social services occupations (21-0000)	\$26.81

A13. Estimates of other total annual cost burden. Provide estimates of the total annual cost burden to respondents or recordkeepers resulting from the collection of information (do not include the cost of any hour burden shown in Questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

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

A14. Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The total annual cost to the Federal government is \$203,993.54, including fringe benefits. The data

collection will cost \$560,982.23 over a 33-month period and includes instrument development, data collection and analysis, reports, briefings, and data documentation. The total cost also includes 416 hours per year of Federal employee time to review and manage this collection for a total of 1,144 hours over the 33-month (2.75-year) period: for a [GS-13, Step 1 in the Washington, DC Locality], at \$53.67 per hour, for a total of \$61,398.48 (or \$81,659.98, FNS used 33 percent to obtain fully loaded wages). Pay rates for federal employees are based on the General Schedule of the Office of Personnel Management for 2023.

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 389.32 hours annually in total burden hours and 2373 hours annually in total response to the burden inventory.

A16. Plans for tabulation, and publication and project time schedule. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Data collection will begin after OMB approval and run for about 21 months.

SNAP State agency survey and document analysis: The study team will use standard quantitative methods to analyze survey data. The team will analyze data by using a statistical software package, such as Stata. The study team will produce tabulations, cross-tabulations, and distributional analyses to assess the completeness of the data, the accuracy of constructed values, and any outliers. The study team will develop and provide a summary report on the quality of the final survey data to FNS, including a variable-by-variable analysis of complete, missing, and out-of-range data.

The study team will analyze the State survey data using quantitative methods to describe the changes State SNAP agencies made to their core operations during and after the public health emergency. The team will then calculate summary statistics (means, medians, and distributions), including the number and proportion of States selecting a given response to each survey question. The study team will group survey responses by broad topic areas that address the four study objectives and use these summary statistics to describe States' approaches to staffing, use of technology, decision making for policy and operational changes, lessons learned, and administrative challenges related to COVID-19.

The study team will use qualitative methods to code responses to open-ended survey questions. For

example, the study team will group similar responses to create categorical variables that can be tabulated. Doing so will increase the efficiency of the analysis and help us convey the findings succinctly. Direct quotes from open-ended responses will add context and color to the quantitative analysis.

In addition to summarizing responses to survey items overall, the study team will conduct subgroup analyses of the data to explore whether and how pandemic-related policy and operational changes varied by States' characteristics. Potential subgroups include FNS region, county-administered SNAP agency versus State-administered SNAP agency, State SNAP caseload size, State population, and subgroups based on the types of waivers or other options used by States.

The results of the document review, which will include internal documents and other materials provided by State agencies as well as documents obtained from public sources, will round out the survey findings and ensure that the study team fully satisfies all research objectives. The study team will use rubrics that will be developed in Microsoft Excel to code the internal documents and other materials provided by State agencies and obtained from public sources. The rubrics will create variables related to the research objectives to be addressed. The study team will compile coded data for all States into an aggregate workbook for cross-State analysis. The study team will manually review open text fields in the spreadsheets for key themes and areas of divergence across States.

SNAP agency case study interview analysis: After completing case study interviews, the study team will thoroughly analyze all qualitative data to better understand programs' processes and operations, decision making, lessons learned from operational changes made during the public health emergency, and perceived readiness to respond for of future disruptions. Interviewers will code and analyze interview notes (in case respondents don't agree to be recorded) and transcriptions in NVivo to ensure the study team comprehensively and consistently analyzes the information provided across different sources and respondents.

Before coding, the study team will develop a codebook and thoroughly train coders to use it, including on the code definitions and coding rules. The study team anticipates developing a priori codes that align with the key research questions and objectives. Developing and applying the coding scheme will be iterative

and involve shaping and reshaping important contextual themes and organizing data in ways that are useful for exploring analytical questions. For quality control purposes and inter-rater reliability, the case study task lead will oversee the coding process; independently code a random 20 percent of transcripts; and, then review and resolve discrepancies with the coders, provide feedback, and refine codes and coding rules as necessary. This process will ensure codes and coding rules are clear and applied consistently across case study interviews. The coding team will meet regularly during this task to discuss questions and check on progress to ensure that the tasks are completed on time.

After coding the data, the team will analyze the results to identify key themes that address each research objective. To triangulate findings, the study team will compare and contextualize interview responses with information available in any additional documents collected during each case study visit, along with survey responses and any administrative data collected for the State.

SNAP agency case study administrative data analysis: The study team will prepare the data to create analytic constructs from raw variables, aggregating individual-level data to create household-level analyses. All analyses will be State-specific and include unweighted descriptive statistics on variables of interest and cross-tabulations to examine the relationship between the operational changes made during the COVID-19 public health emergency and SNAP application acceptance and denial rates, benefit amounts, recertification rates, caseload churn rates, benefit timeliness, and call center operations, as well as how these metrics vary across relevant subgroups. Where appropriate, the study team will also examine State-specific timelines to analyze findings relative to the State's definition of before, during, and after the implementation of COVID-related operational changes in addition to the public health emergency timeline. Where individual level data are not available, the study team will use aggregate data to look broadly at SNAP application acceptance and denial rates, recertification rates, benefit amounts, timeliness, and call center metrics. We will compare the before, during, and after the COVID-19 public health emergency time periods, allowing for analysis of the effects of the policy changes across the whole SNAP program, without specific sub-group analyses.

For each case study State, the study team will analyze administrative records to assess whether and how

SNAP participation and performance metrics differed before and after the State implemented key operational changes, and after the COVID-19 public health emergency was ended. Based on the administrative data elements collected for each case study State, the study team will use calculate average rates (for example, the share of monthly applications submitted online, or monthly recertification approval rates) or use aggregate data provided for periods before, during, and after the public health emergency.

We will present the results from all analyses in two issue briefs and a final study report to be made public on FNS’s website at: <http://www.fns.usda.gov/ops/research-and-analysis> Table A-5, shows the data collection, analysis, and reporting schedule:

Table A-5. Data collection, analysis, and reporting schedule

Project activity	Months after OMB approval
Request State participation in the survey and case studies	1 month after OMB approval
Field survey	1–4 months after OMB approval
Conduct case studies	6–13 months after OMB approval
Code and process data	6–16 months after OMB approval
Analyze data and prepare reports	16–21 months after OMB approval
Prepare data files and documentation	15–21 months after OMB approval

A17. Displaying the OMB Approval Expiration Date. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The agency will display the expiration date for OMB approval of the information collection on all instruments.

A18. Exceptions to the certification statement identified in Item 19. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I Certification for Paperwork Reduction Act.

There are no exceptions to the certification statement.