

Supporting Statement – PART A Justification for OMB Clearance

OMB Supporting Statement 0584-0682

Paperwork Reduction Act of 1995

Understanding the Relationship Between Poverty, Well-Being, and Food Security

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A.1 Circumstances That Make the Collection of Information Necessary.

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new information collection request. The Supplemental Nutrition Assistance Program (SNAP) is the nation's largest federal program aimed at reducing food insecurity and increasing access to healthy food. SNAP is administered by the U.S. Department of Agriculture's (USDA), Food and Nutrition Service (FNS) and provides nutrition assistance benefits to program participants, the majority of whom are children, the elderly, or people with disabilities. Through this data collection effort, FNS seeks to understand the interrelated factors that lead to household food insecurity. Data will be collected in six counties experiencing persistent poverty, which are particularly disadvantaged compared to other counties. The Food and Nutrition Act of 2008, as amended through P.L. 116-94, enacted December 20, 2019, provides the legislative authority for the USDA's FNS to administer SNAP. Section 17 of the Food and Nutrition Act of 2008 provides the authority to FNS to conduct research to help improve the administration and effectiveness of SNAP (Appendix A. Legal Authority).

FNS will use the data collected to support its mission to increase food security and reduce hunger. FNS seeks OMB clearance for data collection that will begin in the winter of 2024.

Studies have found SNAP participation can reduce food insecurity.^{1,2,3,4,5} Some evidence suggests

¹ Mabli J, Ohls J, Dragoset L, Castner L, Santos B. Measuring the effect of Supplemental Nutrition Assistance Program (SNAP) participation on food security. Mathematica Policy Research; 2013.

² Kreider B, Pepper JV, Gundersen C, Jolliffe D. Identifying the effects of SNAP (food stamps) on child health outcomes when participation is endogenous and misreported. *Journal of the American Statistical Association*. 2012;107(499):958–75.

³ Mykerezzi E, Mills B. The impact of food stamp program participation on household food insecurity. *American Journal of Agricultural Economics*. 2010;92(5):1379–91.

⁴ Gundersen C, Kreider B, Pepper JV. Partial identification methods for evaluating food assistance programs: a case study of the causal impact of SNAP on food insecurity. *American Journal of Agricultural Economics*. 2017;99(4):875–93.

⁵ Nord M, Golla AM. Does SNAP decrease food insecurity? Untangling the self-selection effect. Washington, DC: U.S. Department of Agriculture, Economic Research Service; 2009. Report No.: Research Report no. 85.

higher benefit amounts can lead to greater reductions in food insecurity,^{6,7} though other studies have found that relatively small increases to SNAP benefits might not be enough to reduce food insecurity.⁸ Participation in other Federal public assistance programs^{9,10} and emergency food assistance¹¹ also mitigate poverty and food insecurity.

Support structures in the community such as family, friends, and neighbors can also ameliorate food insecurity, poverty, and other dimensions of material hardship,^{12,13} as can public resources and access to transportation, food, and health care. SNAP participating food-secure households are more likely to take advantage of frequent invitations to friends' and families' homes for meals and receive groceries and cash contributions from them.¹⁴ This food coping strategy becomes particularly salient for SNAP households toward the end of the month when they exhaust their benefits. Community-level factors such as economic conditions,^{15,16} transportation access,¹⁷ and geographic access to health care and affordable food^{18,19} also play an

⁶ Mabli J, Worthington J. Supplemental Nutrition Assistance Program participation and child food security. *Pediatrics*. 2014;133(4):610–9.

⁷ Nord M, Prell M. Food security improved following the 2009 ARRA increase in SNAP benefits. Washington, DC: U.S. Department of Agriculture, Economic Research Service; 2011. Report No.: Economic Research Report no 116.

⁸ Gleason P, Kleinman R, Chojnacki G, Forrestal S, Redel N, Wakar B, et al. Evaluation of Demonstration Projects to End Childhood Hunger (EDECH): The Nevada Healthy, Hunger Free Kids Project. Washington, DC: Mathematica Policy Research; 2018 Nov.

⁹ Schmidt L, Shore-Sheppard L, Watson T. The effect of safety-net programs on food insecurity. *Journal of Human Resources*. 2016;51(3):589–614.

¹⁰ Moffitt RA. Economics of Means-Tested Transfer Programs in the United States, Volume I. Vol. 1. University of Chicago Press; 2016.

¹¹ Mabli J, Cohen R, Potter F, Zhao Z. Hunger in America 2010. National Report Prepared for Feeding America Final Report Princeton, NJ: Mathematica Policy Research. 2010;

¹² Martin KS, Rogers BL, Cook JT, Joseph HM. Social capital is associated with decreased risk of hunger. *Social science & medicine*. 2004;58(12):2645–54.

¹³ Edin K, Boyd M, Mabli J, Ohls J, Worthington J, Greene S, et al. SNAP food security in-depth interview study. Mathematica Policy Research; 2013.

¹⁴ Edin K, Boyd M, Mabli J, Ohls J, Worthington J, Greene S, et al. SNAP food security in-depth interview study. Mathematica Policy Research; 2013.

¹⁵ Black DA, Kolesnikova N, Taylor LJ. Local labor markets and the evolution of inequality. *Annu Rev Econ*. 2014;6(1):605–28.

¹⁶ Crandall MS, Weber BA. Local social and economic conditions, spatial concentrations of poverty, and poverty dynamics. *American Journal of Agricultural Economics*. 2004;86(5):1276–81.

¹⁷ Fletcher CN, Garasky SB, Jensen HH, Nielsen RB. Transportation access: A key employment barrier for rural low-income families. *Journal of Poverty*. 2010;14(2):123–44.

¹⁸ Cummings JR, Allen L, Clennon J, Ji X, Druss BG. Geographic access to specialty mental health care across high-and low-income US communities. *JAMA psychiatry*. 2017;74(5):476–84.

¹⁹ Mabli J. SNAP participation, food security, and geographic access to food. Mathematica Policy Research; 2014.

important role. These community contexts interact in numerous ways to influence well-being; for example, case studies in counties with persistent poverty note that a lack of preferred retail outlets within a community not only increases the burden on shoppers' access to food, but also sends local income outside the community and reduces employment opportunities.²⁰ This collection will provide FNS with unique and novel data that has never been collected by USDA or others.

A.2 Purpose and Use of the Information

Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The purpose of the Understanding the Relationship Between Poverty, Well-Being, and Food Security study is for FNS to gain a deeper understanding of the interrelated factors that affect the food security status of SNAP beneficiaries and SNAP-eligible nonparticipants in a selection of persistent poverty counties, information which has not been collected. Examining food insecurity and poverty in these populations will help FNS better understand the association between SNAP, other USDA-administered programs, and community-based assistance with well-being and the food environment.

Specifically, the four study objectives are:

- **Objective 1:** Produce descriptive statistics on key sociodemographic and economic variables, including household food security in a representative sample of all residents in each of six persistent-poverty counties.
- **Objective 2:** Produce descriptive statistics on key sociodemographic and economic variables, including household food insecurity in two representative stratified subsamples of low and very low food-secure residents, in each of six persistent-poverty counties.

²⁰ Erickson D, Reid C, Nelson L, O'Shaughnessy A, Berube A. The enduring challenge of concentrated poverty in America: case studies from communities across the US. Federal Reserve System. 2008.

- **Objective 3:** Produce descriptive statistics for each subgroup in each county on key social, geospatial, and other policy-actionable elements of well-being and material deprivation associated with both household food security and SNAP participation
- **Objective 4:** Characterize the social context and the life course of individuals, within a multigenerational family unit, as they define their experiences with food insecurity through In-Depth Interviews (IDIs).

FNS, in consultation with the study team, identified eligible counties experiencing persistent poverty for the study. The USDA’s Economic Research Service (ERS) has defined counties as being persistently poor if 20 percent or more of county residents were poor at each of the several points in time over a 30-year period, measured by the 1980, 1990, and 2000 censuses and the 2007–2011 American Community Survey. From ERS’s list of approximately 350 counties experiencing persistent poverty,²¹ FNS purposefully selected six counties diverse from each other in order to better understand the impact of different factors on food insecurity and SNAP participation. Counties were purposefully selected, rather than randomly selected, to ensure diversity in terms of geography, urbanicity, and racial and ethnic composition. FNS also selected one county in Appalachia and one county in a region that has experienced a disproportionate level of opioid addiction. To achieve the desired sample sizes and precision targets for the study (described in SSB), FNS only selected counties with a population greater than 10,000. A representative sample of low-income households will be selected in each county, using address-based sampling, including representative subgroups of SNAP households and SNAP-eligible, nonparticipating households. The sample of low-income households will also include a group of SNAP near-eligible nonparticipants (near-eligibles), who might have recently been eligible for SNAP or might be eligible in the future and could be experiencing food insecurity. Data from near-eligible households in these counties are of particular interest, as these households are likely to comprise a substantial portion of those who are ineligible for SNAP in

²¹ <https://www.ers.usda.gov/data-products/poverty-area-measures/poverty-area-measures/>

each county and will provide the basis for exploratory analysis on transitions into and out of being food insecure or being poor.

SNAP administrative data. FNS will contact SNAP agencies for the six selected counties and request administrative data to aid in constructing the sample frame. SNAP administrative data will include demographic and household information for SNAP participants such as phone numbers, names, addresses, primary language spoken, education, and income. FNS will send an email (Appendix B. SNAP Agency Data Request) to the state and/or county agency with SNAP information for the selected counties, as applicable, to introduce the study and request the data for sampling purposes. The contractor will work with each agency to identify the needed data, establish a schedule for delivering files, and provide a secure File Transfer Protocol (FTP) site for agencies to submit files for this one-time request.

Household Survey. We will conduct a voluntary multimode web and phone survey with those in the sample to better understand their sociodemographic and economic backgrounds and key factors (social, geospatial, well-being, and available resources) that might affect the households' experiences with food security and its association with SNAP participation. The survey will collect information about sample member's food insecurity; mental health; health-related quality of life; access to health care; medical expenditures; substance use; social capital; and information about the local retail food environment, access to local food assistance programs assistance programs, and the location of grocery store, transit, and other community resources. We will describe and analyze these factors overall and by subgroup in each county. We also will conduct exploratory analyses of the near-eligible group across counties to understand the patterns of food insecurity and SNAP participation and how fluctuations in their income and other factors can affect those patterns.

We will select an address-based sample to collect data in the six selected counties. The final set of study counties include Dougherty County, GA; Estill County, KY; Bolivar County, MS; Ouachita Parish, LA; Dona Ana County, NM; and Dallas County, AL. For households in the sample, we will send a survey invitation letter (Appendix C1/C2. Survey Invitation Letter), study brochure (Appendix D. Study Brochure), and endorsement letter (Appendix E1/E2. Endorsement Letter) to sampled addresses with a \$5 cash pre-incentive. This mailing will invite the adult who does most of the planning or preparing of meals for the household to complete the survey via web (in English or Spanish) or to call the study toll-free number, if they prefer to complete via telephone. The letter will provide a QR code and web URL for easy navigation to the survey and will share that eligible survey respondents will receive a \$35 Visa gift card after completing the 35-minute survey. Two weeks after we send the first mailing, we will send a survey reminder letter (Appendix F1/F2. First Survey Reminder Letter) to households who have not completed the survey and begin dialing available numbers via Computer-Assisted Telephone Interviewing (CATI) software to request voluntary participation in the study. Eight weeks after the advance letter is sent, we will mail a second survey reminder letter (Appendix G1/2. Second Survey Reminder Letter) and send field staff to identify respondents in-person who have not completed the survey after receiving letters and phone calls. Field interviewers will leave a door hanger for anyone who is not home (Appendix H. Survey Door Hanger). We will mail letters to local police stations to alert them of the presence of field interviewers in their neighborhoods to help increase study legitimacy (Appendix I. Police Station Letter). We will send refusal conversion letters (Appendix J1/J2. Survey Refusal Letter) between four to eight weeks after someone we have made contact with anyone who has refused the survey. We will mail thank you letters to all participants that complete the survey without the assistance of field staff (Appendix K1/K2. Thank You Letter) and include a \$35 Visa gift card as an appreciation for respondents’

completion of the survey. Participants who complete the survey with the assistance of field staff will receive the \$35 Visa gift card directly from the field interviewer and will not receive a mailed letter.

In-Depth Interviews (IDIs). To gain a deeper understanding of the factors associated with food insecurity and to provide context to the survey findings, we will conduct in-person²² IDIs with multigenerational SNAP and SNAP-eligible nonparticipant households. IDIs will focus on the life course of two individuals in a family, including understanding the role systems-level factors (such as food access, local economic conditions, or discrimination and intergenerational trauma) have in shaping an individual's current food security status and how the life course of a parent or grandparent interacts with their children, shaping the lives of both. We will integrate and synthesize findings from the survey and IDIs into an accessible report that tells a clear and interesting story.

The study team will contact 624 individuals/households to conduct 24-26 in-depth interviews over a weeklong period in each of the six study counties, for a total of 144-156 IDIs. The individuals/households will include between 24-26 Spanish speakers and a mix of SNAP and SNAP-eligible nonparticipant households. For each household participating in IDIs, we will attempt to complete two individual interviews (each a different generation), for a total of 24-26 *individual* interviews per county. If it is not possible to schedule interviews with two adults within the same household, the second IDI will be conducted with an adult relative of the survey respondent who lives within the same county.

IDI participants will be drawn from survey respondents. At the end of the survey, respondents will be asked if they are willing to participate in an IDI. The study team will review

²² The study team plans to conduct IDIs in person but will be prepared to conduct this activity remotely if needed because of the COVID-19 pandemic.

responses to the survey, and identify households that contain multiple adults (age 18 or older) within the household who may be interested in participating in an in-person survey. Trained staff will then contact these survey respondents by telephone to explain the purpose of the IDIs, topics to be discussed, logistics, incentives and also determine whether another adult relative lives within the household or, if not in the household, within the same county who would be willing to participate in an IDI (Appendix L1/L2. IDI Invitation Call Script). Staff will send a confirmation letter by mail or, if appropriate, email (Appendix M1/M2. IDI Confirmation Letter/Email) to those who agree to participate and call to remind them of the upcoming interview (Appendix N1/N2. IDI Reminder Call Script). The interviews will focus on important experiences and turning points in the life of the respondent relating to food insecurity and economic instability, including topics such as household dynamics, employment, use of SNAP and other food assistance programs, resource sharing and coping strategies. After securing participant consent (Appendix O1/O2. IDI Consent Form), the study team will use the IDI interview guide to help facilitate the IDI discussion (Appendix P1/P2. IDI Interview Guide). Each IDI will last up to 120-minutes and will be conducted either virtually (by phone or video-conference) or in-person, depending on what is most convenient for participants.

Focus Groups with Community Stakeholders. To enhance our understanding of the community overall and to learn about its economic and resource environment, we will hold one focus group in each county with community stakeholders that work closely with low-income populations. The study team will contact 120 community stakeholders in the six study counties and conduct one focus group with approximately 8 community stakeholders in each study county (to secure 48 stakeholders total). The focus groups will include 36 stakeholders from a mix of community-based organizations [Business (Profit, Non-Profit, or Farm) category] and 12 SNAP agency staff (State, Local, or Tribal Government). The focus groups will provide information

about the community contextual factors that help shape the local food and service environment in the study counties, including the availability of needed resources and service gaps in their community, and will last 90 minutes. Focus groups will be conducted in-person at a shared location within the county (if necessary, focus groups can be conducted virtually). After securing participant consent (Appendix Q1. Focus Group Consent Form), the study team will use the discussion guide to help facilitate the focus groups (Appendix Q2. Focus Group Discussion Guide).

Focus group participants will be identified through a web-based scan of community service providers in each study county and sent an invitation that explains the purpose of the study and invites their organization to participate in a focus group (Appendix Q3. Focus Group Invitation). The one-page study description will be included as an attachment (Appendix R. Study Description).

A.3 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.

The study team will use a secure file transfer protocol site to allow SNAP agencies to efficiently and securely transfer administrative data, to construct the sample. When fielding the household survey (Appendix S1. Household Survey), sample members will be invited to complete a web survey, as this is the least burdensome mode. Sample members will also have the option of completing the survey by phone, if that would be easier for them. Appendix S2 and S3 (Appendix S2/S3. Screenshots of Web Survey) provides screenshots of the web survey. The study team's computer-assisted survey capabilities enable them to efficiently build and launch the survey, and respondents can seamlessly switch between survey modes, meaning a respondent

may begin on the web and finish by phone, or visa versa. The system also has built-in mobile formatting to ensure respondents taking a survey on a handheld device have the same quality experience as those taking a survey on a computer. If a respondent agrees to the survey while a field staff member is present, the staff member will call into the survey operations center on a study-issued phone and connect the sample member to a trained phone interviewer to complete the survey. The materials that households receive will include a QR code that will make accessing the survey simple from a handheld device. We will provide the URL at <https://www.websiteforthcoming.com>²³ and a unique username and password to access the survey in the invitation letter. FNS estimates 100 percent of the responses will be electronically submitted via a web-based or electronic CATI system and 100 percent of SNAP agency responses will be electronically uploaded via secure data transfer.

A.4 Efforts to Identify of Duplication and Use of Similar Information

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There is no duplication with other data collection efforts. The survey asks questions about food security, poverty, and related individual and family circumstances and environmental factors. The survey will not ask questions that are available from administrative data. Most of the questions are asked in other surveys, but not in this combination and not within this unique population of persistent poverty counties. For example, the survey includes the U.S. Household Food Security Survey Module to assess food security levels and questions about social capital (such as, “[If you / If your household] had a problem with which you needed help, for example, sickness or moving, how much help would you expect to get from other people in the community besides family and friends, such as a social service agency or a church?” and “How often did you and your neighbors do favors for each other?”) from the Civic Engagement Supplement of the

²³ The website does not yet exist.

Current Population Survey. The survey also asks about environmental factors such as how transportation access impacts food access in the question, “Does a lack of transportation options determine where you shop for groceries?” Using geospatial data, the study team will be able to compare respondent’s perceived distance versus actual distance from food retail stores.

A.5 Impacts on Small Businesses or Other Small Entities

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The community stakeholder focus groups within this data collection effort may involve small entities, but the interviews are streamlined and will only take 90 minutes to minimize burden. Participation in these focus groups is voluntary. The number, type, and mix of community stakeholders will vary by county, but the study team anticipates it will include six-eight representatives from community-based organizations (such as food banks, community action agencies, behavioral health providers, community centers, and feeding sites) from each county. We assume roughly half of the 36 total community-based organizations will be small businesses.

A.6 Consequence 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 data collection is voluntary and will only occur once. Without this data collection, FNS will not obtain information about the factors that have policy-actionable correlates of food insecurity among SNAP participants and SNAP-eligible nonparticipants in counties with persistent poverty. FNS needs the data to better understand the association between SNAP, other USDA-administered programs, community-based assistance and well-being and the food environment.

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320

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 3 years;**
- **In connection with a statistical surveys, 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 of 5 CFR 1320.5.

A.8 Comments in Response to Federal Register Notice and Efforts to Consult Outside the Agency

If applicable, identify the date and page number of publication in the *Federal Register* of the agency's notice, 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.

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 form, and on the data elements to be recorded, disclosed, or reported.

A.8.1. Federal Register Notice and Comments

In accordance with 5 CFR 1320.8(d), FNS published a notice on October 12th, 2022, in the *Federal Register*, Volume 87, Number 96, pages 61561-61564, and provided a 60-day period for public comments, closing on December 12th, 2022. FNS received four public comments [and all four were publicly posted on <https://www.regulations.gov>. We provide these comments and (Appendices T1 – T4) and the FNS’s responses to three of these comments deemed relevant to need, time, cost, and practical utility (T5-T7). Public Comment 4 (Appendix T4) resulted in FNS adding one question to the survey related to 5-year household-level financial outlook (Question F10 in Appendix S1).

A.8.2. Consultations Outside the Agency

FNS consulted with several experts (Table A-8.2) to inform the study protocols, data collection instruments, and ICR package. Dr. Younginer provided a thorough review of all IDI materials and had no concerns. Dr. Schoua-Glusberg reviewed data collection recruitment materials with a focus on cultural responsiveness and made minor edits to Spanish translations. Dr. Shaefer and Dr. Bartfeld provided overall feedback on the ICR package, noting the materials were comprehensive, clear, and methodologically solid. FNS also consulted with a staff member at the National Agricultural Statistical Service (NASS) to review the study’s methodology (Appendix T8). There were no problems that could not be resolved during consultation.

Table A-8.2 Expert Consultant List

Name	Title	Affiliation	Phone
Jeffrey Hunt	Mathematical Statistician	National Agricultural Statistics Service	(202) 720-5539
Nicholas Younginer	Research Assistant Professor, Arnold School of Public Health	University of South Carolina	(803) 777-4453
Alisú Schoua-Glusberg	Principal Research Methodologist	Research Support Services Inc.	(847) 864-5677
Judi Bartfeld	Professor, Department of Consumer Science & Affiliate, Institute for Research on	University of Wisconsin-Madison	(608) 262-4765

	Poverty		
Luke Shaefer	Professor, Gerald R. Ford School of Public Policy & Director, Poverty Solutions	University of Michigan	(734) 936-5065

A.9 Explanation of Any Payment or Gift to Respondents

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

FNS is requesting the use of a pre-paid survey incentive of \$5 cash and a post-survey incentive of a \$35 Visa gift card for completing the survey. Those who complete the IDI will receive an additional \$50 Visa gift card for participation in the 120-minute IDI.

Incentives can mitigate the risk of nonresponse bias and help efficiently reach the sample sizes needed to produce quality point estimates in each county. Incentives can be particularly useful in mitigating against nonresponse bias among low-income respondents, those residing in rural areas, and those receiving federal nutrition assistance benefits.^{24,25} To achieve these targeted sample sizes and collect data representative of the populations of interest, FNS proposes a combination of a \$5 pre-pay and \$35 post-pay survey incentive. While pre-pay incentives can be effective, a \$5 pre-pay incentive alone is not likely to achieve a response rate over 60% among an address-based sample.²⁶ A combined approach that includes both pre- and post-pay incentives can produce higher response rates than pre- or post-pay incentives, alone.^{27,28} Incentives also reduce the level of effort needed during data collection by reducing the time and effort to locate hard-to-find populations and by helping convince sampled households to participate.

²⁴ Singer, Eleanor, et al. "The effect of incentives on response rates in interviewer-mediated surveys." *Journal of official statistics* 15.2 (1999): 217.

²⁵ Bonevski, Billie, et al. "Reaching the hard-to-reach: a systematic review of strategies for improving health and medical research with socially disadvantaged groups." *BMC medical research methodology* 14.1 (2014): 1-29.

²⁶ Debell M, Maisel N, Edwards B, Amsbary M, Meldener V. Improving Survey Response Rates with Visible Money. *Journal of Survey Statistics and Methodology*. 2020;8(5):821–31.

²⁷ Mercer A, Caporaso A, Cantor D, Townsend R. How much gets you how much? Monetary incentives and response rates in household surveys. *Public Opinion Quarterly*. 2015;79(1):105–29.

²⁸ Singer E, Ye C. The use and effects of incentives in surveys. *The ANNALS of the American Academy of Political and Social Science*. 2013;645(1):112–41.

To further reduce nonresponse bias and improve response rates, the study team will conduct one experiment, investigating a higher post-pay incentive among targeted subgroups. Further information about our proposed experiment can be found in Appendix U (Incentive Experiments).

A.10 Assurance 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 will comply with all Federal and State laws to protect privacy, including the requirements of the Privacy Act of 1974 (5 USC Section 552a). The study team will adhere to the requirements in the system of record notice (SORN) FNS-8 USDA/FNS Studies and Reports, published in the Federal Register on April 25, 1991, volume 56, pages 19078 – 19080 (Appendix V1: FNS-8 USDA/FNS Studies and Reports) as well as FNS-10 USDA/FNS Persons Doing Business with the Food Nutrition Service, published in the Federal Register on March 31, 2000, volume 65, pages 17251–17252 (Appendix V2: FNS-10 USDA/FNS Persons Doing Business with FNS).

All respondents' information will be kept private and not disclosed to anyone but the analysts conducting this research, except as required by law. County residents participating in any component of this study will be assured that the information they provide will not be released in any form that identifies them. No identifying information will be attached to any reports or data supplied to USDA or any other researchers. Issues of privacy will be discussed during training sessions with staff working on the project. During the consent process for the household survey and IDIs, trained interviewers will remind participants that their participation is voluntary. Participants will be provided a Privacy Act Statement during the consent process before personally identifiable information is collected. State or county agencies will transfer

records such as administrative data to the contractor using a secure file transfer protocol site, in case the files contain personally identifiable information. Michael Bjorkman, the FNS Privacy Officer, reviewed and approved this Information Collection Request on November 4th, 2022.

A.11 Justification for Sensitive Questions

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.

Household Survey. The survey includes questions about income, race/ethnicity, whether anyone in the household has a physical, mental, or emotional limitation, whether anyone in the household abuses drugs, and participation in nutrition and other assistance programs, which some survey respondents might consider sensitive. These questions are essential to measure some of the key outcomes of this study, as we are aiming to understand the various factors that may contribute to food insecurity among households in various counties with persistent poverty relative to national estimates, whether disparities exist among SNAP participants, and if the depth of the disparities differs between SNAP participants and nonparticipants (to shed light on whether SNAP participation may moderate existing disparities between racial and ethnic groups). All participants can decline to answer any question they do not wish to answer, and there are no negative consequences for not participating. Respondents will also be assured of privacy at the outset of the interview.

In-Depth Interview. For individuals/households who voluntarily agree to participate in an in-depth interview, the study team will ask some questions that respondents may consider sensitive. Potentially sensitive topics may include (1) family structure (2) employment and (3) relationships between family members and household experiences with poverty and food

insecurity. Questions that generate information about these topics are necessary to gain a better understanding of the context in which individuals/households experience economic hardship and the effect they perceive it has on their well-being and the well-being of their family. The study team will inform interview IDI respondents that their identities will be kept private to the extent permitted by law, their responses will not affect services or benefits they or their family members receive, and they can choose not to answer any questions that make them uncomfortable.

FNS has contracted with a vendor to conduct this evaluation, Appendix W.

Confidentiality Agreement covers the obligation of staff to uphold confidentiality as a condition of employment. The study team sought and received Institutional Review Board (IRB) expedited approval for this information collection from the Health Media Lab IRB on August 21, 2022 (Appendix X: IRB Approval Letter). On November 4, 2022, Michael Bjorkman, the FNS Privacy Officer, reviewed and approved this Information Collection Request.

A.12 Estimates of Annualized Burden Hours and Costs

Provide estimates of the hour burden of the collection of information. The statement should:

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

A12.1. Estimated Total Burden

The burden table (Appendix Y. Burden Table) presents the number of respondents, frequency of response, and annual hour burden for individuals/households, business (profit, non-profit, or farm), and State, local or Tribal government. In this submission, there are 20,277 total

respondents (16,207 respondents + 4,070 non-respondents), 130,601 responses (86,728 respondents + 43,873 non-respondents), and 7,792 total burden hours. The affected public includes 20,112 individuals/households, 96 individuals from business (profit, non-profit, or farm), and 69 individuals from State, local or Tribal government. FNS anticipates 100 percent participation of SNAP agencies. Altogether, the total annual burden hours is 7,792. The total cost of respondent burden is \$63,231.97.

A12.2. Estimated Cost of Burden

Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate using the U.S. Department of Labor, Bureau of Labor Statistics, May 2021 National Occupational Wage and Statistics for the following Occupational Groups and the U.S. Department of Labor Federal minimum wage:

- 11-000 Management Occupations (<https://www.bls.gov/oes/current/oes110000.htm>)
- 21-000 Community and Social Service Management Occupations
(<https://www.bls.gov/oes/current/oes210000.htm>)
- Federal minimum wage (<https://www.dol.gov/agencies/whd/minimum-wage>)

The estimated annualized cost for State/local/tribal government (Occupation Code 11-0000, Management Occupations) is \$6,145.55. The original base rate of \$59.31/hour is multiplied by 1.33 to account for an additional 33 percent of the estimated based annual respondent costs which must be added to represent fully loaded wages, and this sums to a base rate of \$78.88. The fully loaded wage rate (\$78.88) is multiplied by the total hours (77.9 hours) to equal \$6,145.55.

A.13 Estimates of Other Total Annual Cost Burden to Respondents and Record Keeper
Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden

shown in items 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.

A.14 Annualized Cost to the Federal Government

Provide estimates of annualized cost to the Federal Government. Also, 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 cost to the Federal Government is \$7,444,877. The largest cost to the Federal government is to pay a contractor \$7,278,072 over a period of 60 months (September 2021 to September 2026) to conduct the study, including approximately \$319,800 in respondent incentives. This represents an average annualized cost of \$1,455,614, including labor and other direct and indirect costs. The annualized cost of this information collection also assumes a total of 400 hours of Federal employee time (400 hours for a GS-14, Step 2 program analyst at \$62.71 per hour, for a total annual cost of \$25,084). Including \$8,277 for fringe benefits (\$25,084 x 0.33), the total for Federal employee time equals \$33,361 annually. Federal employee pay rates are based on the General Schedule and locality payment for Washington, D.C., provided by Office of Personnel Management for 2022. (Retrieved from https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/DCB_h.pdf).

A.15 Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new collection of information estimated to add 7,792 total annual burden hours and 130,601 annual responses to the OMB information collection inventory as a result of program changes.

A.16 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.

We will produce descriptive summary statistics describing the prevalence of household food insecurity and key social, spatial, and other elements of well-being. These summary statistics will characterize the following:

- 1. Food insecurity and key sociodemographic and economic characteristics** among a representative sample of households in each of the six counties. We will also provide this information separately for SNAP households and SNAP-eligible non-participating households within each county.
- 2. Social, spatial, and other key policy-actionable elements of well-being** among SNAP households and SNAP-eligible non-participating households within each county. We will summarize measures of mental health, health-related quality of life, access to health care, medical expenditures, substance use, social capital, the local retail food environment and access to local food assistance programs and the location of grocery store, transit, and other community resources.

In addition to providing summary statistics for these measures, we will also assess the association between household food security status and the comprehensive set of demographic, economic, and well-being characteristics measured in the survey, separately for SNAP households, SNAP-eligible non-participating households, and SNAP-ineligible households. We will test for statistically significant differences between household subgroups in these characteristics and also examine their associations with food security status, within and across counties.

Prepare sampling weights. An appropriate method to estimate sampling variances for complex sample designs such as the Understanding the Relationship Between Poverty, Well-Being, and Food Security study are the procedures based on the Taylor series linearization of the nonlinear estimator. The Taylor series linearization procedure is based on a classic statistical method in which a nonlinear statistic may be approximated by a linear combination of the components within the statistic. For most commonly used nonlinear statistics, such as those proposed for this study, the linearized form has been developed and has good statistical properties. The sampling variance may be estimated by using many features of the sampling design (for example, finite population corrections, stratification, multiple stages of selection, and unequal selection rates within strata). This is the basic variance estimation procedure used in all SUDAAN procedures as well as in the survey procedures in SAS, STATA, and other software packages that accommodate simple and complex sampling designs. To calculate the variance, sample design information (such as stratum, analysis weight, and so on) is needed for each sample unit.

In addition to the creating full-sample analytic weights, we will conduct a nonresponse bias analysis to describe the difference between respondents and nonrespondents and evaluate how well the fully-adjusted analysis weights account for those differences.

Project Time Schedule. Table A-16 shows the planned schedule for Understanding the Relationship Between Poverty, Well-Being, and Food Security study.

Table A-16. Project Schedule

Activity	Schedule
Conduct pretest	March and April 2022
Prepare OMB PRA package	May 2022 – August 2022
Recruitment and disseminate advance materials	January 2024 – May 2024
Data collection	2 years following OMB clearance (6-9 months)
Analysis	2 weeks after close of data collection (4 months)
Reporting	Summer 2026
Data files and documentation	Summer 2026

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A.17 Reason(s) Display of OMB Expiration Date is Inappropriate

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

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

A.18 Exceptions to the Certification for Paperwork Reduction Act Submissions

Purpose and Use of the Information

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.