

Supporting Statement Part A

OMB No. 0584-[NEW]

Assessing Equity in Work Requirements and SNAP Employment and Training

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Part A. Justification

A.1. Circumstances That Make Data Collection 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 Food and Nutrition Act of 2008, as amended in 2014,¹ provides the legislative authority for the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) to administer the Supplemental Nutrition Assistance Program (SNAP). Section 17 of the Food and Nutrition Act of 2008 provides FNS with the authority to conduct research to help improve the administration and effectiveness of SNAP (attachment A).

Congress has amended Federal law to add provisions for SNAP participants focused on employment and work. SNAP participants aged 16–59 must meet certain general work requirements unless they are exempt or show good cause for being unable to work.

Noncompliance with general work requirements may result in disqualification for any person from SNAP. SNAP participants aged 18–49 who do not have disabilities and live in households without dependents—referred to as able-bodied adults without dependents (ABAWDs)—are subject to a time limit on receipt of SNAP benefits. ABAWDs must be employed or participate in SNAP Employment and Training (E&T) activities for 80 hours a month or participate in workfare to maintain SNAP benefits for more than 3 months in a 36-month period. ABAWDs and other SNAP participants who are not exempt from work requirements can meet their work requirements by participating in a SNAP E&T program.

SNAP State agencies must operate a SNAP E&T program to help SNAP participants gain skills, training, or work experience. The SNAP E&T program is meant to increase participants' ability to obtain regular employment and achieve economic self-sufficiency. While SNAP State agencies must offer a SNAP E&T program, they have flexibility in deciding whether some or all

¹ As amended through Pub. L. 113–128, 7 U.S.C. 2026

participants subject to general work requirements are required to participate or whether to exempt them from this requirement and offer a voluntary SNAP E&T program.

SNAP participants subject to SNAP work requirements and those who volunteer to participate in SNAP E&T represent a population often facing systemic barriers to employment opportunities, such as low educational attainment, less recent attachment to the labor force, and lack of transportation. The Federal Government made a commitment to ensure programs such as SNAP advance equity for all, including individuals who have been historically marginalized or underserved. President Biden's January 20, 2021, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government² explains the need to address any barriers to equal opportunity caused by policies and programs to advance equity.

In alignment with the Executive Order, USDA FNS has contracted with Westat Insight to conduct a study identifying the data available from SNAP State agencies, their SNAP E&T provider partners, and other sources that can be used to develop measures to assess and monitor equity in the administration of SNAP work requirements and SNAP E&T services. The study includes a survey of all 53 SNAP State agencies, document review, and key informant interviews with individuals from 6 States. This Information Collection Request includes five data collection instruments: (1) Survey Instrument (attachment C); (2) SNAP State Agency Interview Protocol (attachment D); (3) SNAP Local Agency Interview Protocol (attachment E); (4) SNAP E&T Provider Interview Protocol (attachment F); and (5) Interested Parties Interview Protocol (attachment G).

² See <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>

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.

Purpose of information collected

The findings from this study will provide FNS with recommendations on how to assess and monitor equity in the administration of work requirements in SNAP and SNAP E&T programs.

The information collected will be evaluated to identify the data available to assess equity in the application of policy or other instances where equity issues may arise, such as equitable access to SNAP through the administration of work requirements, equitable participation in education and training programs through SNAP E&T programs, or the influence of optional and discretionary policies and procedures on participant outcomes.

FNS will use this information in considering plans to examine how and whether States are providing equitable access to SNAP through the administration of work requirements, achieving equitable participation in education and training opportunities through the SNAP E&T program, and adopting program option and discretionary policies and procedures that influence disparities. The study findings will be summarized in a report. FNS will post the final report with detailed findings in aggregate form on the FNS website. FNS may share public-use data files, which will not include any information that would compromise participant privacy, with other entities as requested. The research objectives of this study as defined by FNS and a description of the data collection are provided in attachment B, Research Objectives and Approach to Data Collection.

From whom and how the data are collected

Table A.2.1 provides an overview of the data collection instruments, number of potential respondents, method of collection, and purpose. Participation is voluntary. Information on data collection processes can be found in Supporting Statement Part B.

Table A.2.1. Overview of Data Collection Activities

Instruments	Affected Public	Respondent Type	Method of Collection	Length^a	Purpose
Survey Instrument Pretest (attachment C)	Individuals	Six survey pretesters (former SNAP State administrators and staff)	Paper survey and telephone debrief on pretest	90 minutes	Assess question clarity, response burden, and effectiveness of delivery method, and identify whether specific items, question structure, or question order can negatively affect data quality
Survey Instrument (attachment C)	State government	53 SNAP State Directors	Web survey	25 minutes ^b	Describe how State agencies administer SNAP work requirements and SNAP E&T programs in sufficient detail to summarize practices within and across States. Survey will also help identify how States address equity in administering their SNAP work requirements and SNAP E&T programs
		53 SNAP State E&T Directors	Web survey	25 minutes ^b	
		53 SNAP State data analysts	Web survey	25 minutes ^b	
SNAP State Agency Interview Protocol Pretest (attachment D)	State government	One SNAP State Director (senior program manager who oversees SNAP E&T program)	Virtual video-conferencing platform	90 minutes	Ensure respondents understood phrasing and content of questions and test duration; determine need to add or remove questions
SNAP State Agency Interview Protocol (attachment D)	State government	Six SNAP State Directors	Virtual video-conferencing platform	90 minutes	Obtain perspectives of program directors on State-level decision making related to waivers and other State options, types of SNAP E&T components offered, location of SNAP E&T services, provider selection, and hiring practices
		Six SNAP State E&T Directors	Virtual video-conferencing platform	90 minutes	
		Six SNAP State data analysts	Virtual video-conferencing platform	90 minutes	
SNAP Local Agency Interview Protocol Pretest (attachment E)	Local government	One local SNAP office director	Virtual video-conferencing platform	60 minutes	Ensure respondents understood phrasing and content of questions and test duration; determine need to add or remove questions
		Three local SNAP office staff	Virtual video-conferencing platform	60 minutes	

Instruments	Affected Public	Respondent Type	Method of Collection	Length^a	Purpose
SNAP Local Agency Interview Protocol (attachment E)	Local government	12 local SNAP office directors	Virtual video-conferencing platform	60 minutes	Understand how SNAP eligibility workers identify participants who are subject to work requirements and who are referred to SNAP E&T; understand local office's role in addressing equity
		24 local SNAP office staff	Virtual video-conferencing platform	60 minutes	
SNAP E&T Provider Interview Protocol Pretest (attachment F)	Local government	Two local SNAP E&T provider staff	Virtual video-conferencing platform	60 minutes	Ensure respondents understood phrasing and content of questions and test duration; determine need to add or remove questions
SNAP E&T Provider Interview Protocol (attachment F)	Businesses (for profit, nonprofit)	36 SNAP E&T provider staff	Virtual video-conferencing platform	60 minutes	Understand provider role in ensuring and addressing equity in provision of SNAP E&T
	Local government	36 SNAP E&T provider staff	Virtual video-conferencing platform	60 minutes	
Interested Parties Interview Protocol Pretest (attachment G)	State government	Two interested parties (non-SNAP program staff)	Virtual video-conferencing software	60 minutes	Ensure respondents understood phrasing and content of questions and test duration; determine need to add or remove questions
Interested Parties Interview Protocol (attachment G)	State government	Six interested parties (non-SNAP program staff)	Virtual video-conferencing platform	60 minutes	Understand how interested parties work with SNAP agencies to address equity in SNAP E&T
	Businesses (for profit, nonprofit)	Six interested parties (business staff)	Virtual video-conferencing platform	60 minutes	

^a Length is estimated time to complete each data collection.

^b SNAP State Directors are expected to enlist up to two staff to assist them in completing the survey. The total estimated time to complete the survey of 75 minutes is divided evenly among the SNAP State director, the SNAP State E&T director, and a SNAP State data analyst.

To meet the study objectives, FNS will employ two data collection efforts:

- ▶ **Web-based survey:** The study team will conduct a one-time census of the 53 SNAP State agencies through a web-based survey (attachment C). The web-based survey will collect information on State-level policies and practices, SNAP E&T operations, and data available on SNAP E&T processes and participants that could be used to examine equity issues. Examples of information collected in the survey include how SNAP State agencies make decisions on where to offer SNAP E&T services, the types of service providers and partners SNAP State agencies contract with for SNAP E&T, how SNAP State case manager assignments are made, and whether SNAP State agencies have an explicit hiring policy on diversity and inclusion.

FNS will initiate data collection by contacting the SNAP State Directors via email to explain the overall project (attachment H.1), including a one-page summary document (attachment H.2). The study team will recruit SNAP State Directors and launch the survey via email (attachment H.3). The email will include a web link to the survey, instructions for completing the survey, and information for contacting the study to receive assistance. The launch email will also include a frequently asked questions (FAQ) document to help answer anticipated questions (attachment H.4). All SNAP State Directors will be instructed that they may enlist up to two staff, such as a data analyst and SNAP E&T Director, to assist them in completing the survey. Email reminders and phone call reminders will be used to achieve the desired response rate (attachments H.6, H.7, and H.8). SNAP State Directors will receive a thank-you email for participating in the survey (attachment H.9).

When recruited for participation in the survey (attachment H.3), the 53 SNAP State agencies will also be asked to submit relevant files pertaining to their State agency's administration of SNAP work requirements and SNAP E&T program. All SNAP State Directors will receive a list of the types of documents being requested and instructions

on how to submit files online (attachment H.5). Examples of relevant documents include strategic plan progress tracking; documents describing funding allocations, outreach materials, and contracts with providers and partners; and any analyses or reports related to equity that SNAP State agencies have produced.

SNAP State Directors may enlist another staff member familiar with SNAP data systems, such as a data analyst, to collect and submit the files.³ No personally identifiable information will be requested in the documents. To minimize burden, the study team will request only files that cannot be obtained from other sources. The thank-you email (attachment H.9) SNAP State Directors receive after completing the survey includes a reminder to submit documents. If necessary, SNAP State Directors will receive an additional email reminder to submit relevant files (attachment H.10).

- ▶ **Key informant interviews:** The study team will conduct key informant interviews in six States that vary in their experience with SNAP work requirements, administration of SNAP E&T programs (e.g., type of SNAP E&T program, caseload size), and geographic location. In each of the six States, the study team will conduct virtual interviews to better understand how the day-to-day administration of work requirements and SNAP E&T programs affects equitable access to programs and services, discuss SNAP State agency policies that dictate how SNAP E&T case management services are provided, and determine how decisions about assignment to SNAP E&T components and participant reimbursements are handled.

To reduce burden on SNAP State agencies, the study team will review survey responses prior to conducting key informant interviews and tailor interview protocols based on what the team learns from the State agencies. For example, the study team will further probe about the types of data SNAP State agencies gather to assess equity and how they

³ The total estimated time to collect and submit files is 100 minutes, which has been divided between the SNAP State director (40 minutes) and the SNAP State data analyst (60 minutes).

identify participants who are subject to work requirements and ask them to share any challenges or considerations for measuring equity in SNAP E&T and work requirements.

State agencies selected for interviews will be invited to participate in the interviews in the initial notification email about the study (attachment H.1). At the start of the interview data collection, the States that agree to participate in the interviews will receive a confirmation email (attachment H.11) with an interview FAQ (attachment H.12) and a scheduling email (attachment H.13).

The study team will work with the SNAP State Director to identify study interview participants. Up to eight virtual interviews may occur per State, including (1) one SNAP State agency interview lasting up to 90 minutes with the SNAP State Director, the SNAP E&T Director, and a data manager or analyst (attachment D); (2) two SNAP local office interviews (one interview at two different offices), each lasting up to 60 minutes, with a SNAP E&T administrator and two local staff (attachment E); (3) four SNAP E&T provider interviews (one interview per SNAP E&T provider), each lasting up to 60 minutes, with up to three staff per provider (attachment F); and (4) one interested party interview lasting up to 60 minutes with up to two staff members (attachment G).

Relevant interested parties may include representatives of community-based organizations, community college consortiums, or American Job Centers, who may be government employees or representatives of academic and business interests. Interview participants will receive a consent form prior to participation (attachment H.14). All interviews will be recorded with the permission of the respondents to aid with note-taking. Participants will receive a thank-you email for their time (attachment H.15).

The study team pretested all data collection instruments by first recruiting six former SNAP State administrators and staff to pretest the survey instrument. Each participant was sent a paper-and-pencil copy of the survey with a form for recording feedback and asked to thoroughly review each question and all response options. Each participant then participated in an interview led by an experienced survey

methodologist who reviewed the feedback form and asked participants to identify any questions or response options that did not make sense to them, that used jargon or unfamiliar language, or that could be expressed differently to facilitate other participants' answers.

Because pretest participants did not complete the survey as actual participants would, accuracy of the estimated time to complete the survey cannot be addressed quantitatively. However, some participants indicated the 40–60-minute estimate seemed accurate, while others thought it would take between 90 minutes and 2 hours to complete the survey. Because of the wide variation in participants' expectations regarding completion times, the study team increased the anticipated time to complete the survey from 60 minutes to 75 minutes. Attachment K describes the pretest and the changes made as a result of pretesting.

The study team pretested the four key informant interview guides with SNAP State agency administrators, local office staff, SNAP E&T providers, and an interested party representative in one State. Interview pretest respondents were selected to represent the roles appropriate to each guide. The State Agency interview lasted 1 hour and 28 minutes, which was 2 minutes less than the estimated time for the interview. However, the interviewer skipped a section related to SNAP E&T providers because another agency was responsible for SNAP E&T oversight. This pretest suggested the protocol needed to be streamlined to ensure completion in the allotted time, so the study team restructured some questions.

The other three interview protocols (local SNAP office, SNAP E&T providers, other interested parties) did not require any edits to be completed in the allotted time, confirming the initial burden estimate of 60 minutes for each interview was accurate. Attachment K describes the changes made as a result of pretesting.

Frequency of information collected: The survey, interviews, and document review will be completed once. Data collection will span approximately 7 months. Data collection is anticipated to begin in late 2024 and conclude in early 2025.

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.

This study will comply with the E-Government Act of 2002.⁴ This section describes the extent to which the collection of information for this study involves electronic techniques and other considerations to reduce burden for each of the key data collection components. The study team anticipates 21.3 percent of the total responses (265 of 1,246 responses) will be collected electronically. All survey responses will be completed via the web link at <https://www.notyetc.com>. The study team will use a web-based platform (e.g., Qualtrics) to collect survey responses. The survey will reduce burden for respondents by programming skips for nonapplicable questions and enabling participants to submit responses efficiently, save their work if they are not able to complete their response at once, and collaborate with knowledgeable colleagues if needed. Edit checks will improve data quality and streamline the process of data retrieval, cleaning, and coding. SNAP State agency staff will have the option of submitting documentation to the study team electronically via email or a web portal.

Data collected during interviews will not employ information technology. Instead, data will be collected over a virtual video telephone call. To reduce the burden of these discussions, interviewers will review the State agency's survey results and documentation prior to the interview to tailor the interview guides and reduce the number of questions asked, as possible.

A.4. Efforts to Identify 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.

⁴ Pub. L. 107-347, 44 U.S.C. Ch. 36

No similar prior or ongoing information collection duplicates the efforts of the proposed data collection. FNS has reviewed USDA reporting requirements, SNAP State administrative agency reporting requirements, and special studies by other government and private agencies and concluded that no available data sources can provide data needed to answer the study's research questions.

Every effort has been made to avoid duplication and reduce burden, including pretesting the web-based survey and key informant interview protocols. The study team will use information obtained from the document review. The web-based survey and key informant interviews will focus on information not currently available, such as operational practices of SNAP E&T programs, staffing and hiring practices, and decision-making processes regarding where to offer SNAP E&T programs and the offered component types.

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.

This information collection has been held to the minimum required for the intended use. FNS estimates that 14.3 percent (approximately 42 of 293) of respondents, such as SNAP E&T providers or other interested parties from business for-profit and not-for-profit entities, are small entities as defined by Office of Management and Budget (OMB) Form 83-I. Because these businesses partner with the SNAP State agency to implement or operate SNAP E&T programs, they must be included in the study. However, the study team expects the burden on these programs to be minimal.

For all respondents, the study team will minimize the burden by providing clear guidance on procedures and requesting only the information required to achieve the study's objectives as part of this one-time data collection. Interviews with respondents will be scheduled according to their availability, and no more than 60 minutes will be required of any one individual from a small entity.

A.6. Consequences of Collecting 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. If this information collection is not conducted, FNS will not have insight into SNAP State agency activities, processes, procedures, and perspectives that can be used to measure and assess equitable administration of SNAP work requirements and SNAP E&T programs. Understanding the variation across the policies, the practices, and the processes of SNAP State agencies is necessary to identify potential disparities in program access and outcomes.

A.7. Special Circumstances Relating to Guideline of 5 C.F.R. 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 3 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**
- ▶ **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 will be conducted in a manner consistent with 5 C.F.R. 1320.5.

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

If applicable, provide a copy and 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 notice of the proposed information collection and an invitation for public comment were published in the *Federal Register* September 6, 2023 (vol. 88, no. 171, pages 60913–60919). The period for comments closed November 6, 2023. FNS received one comment(s) on this proposed information collection about the adequacy of the study methods to inform FNS' understanding of equity in SNAP. This comment and FNS' response are provided in attachment I.

FNS consulted with a mathematical statistician from USDA's National Agricultural Statistics Service (NASS), who reviewed the study methodology and statistical procedures. The review from NASS and the study team's response to NASS's comments appear in attachment J.

Table A.8.1 lists the individuals consulted outside the agency. The study team consulted nine individuals with varied expertise in measurement and methodology related to assessing equity in workforce development and human services programs, racial and intersectional equity, and SNAP E&T programs and operations. The nine individuals provided insights into the study methodology and instruments. Based on their input, the study team adjusted the web-based survey, the material requested as part of the document review, and the key informant interview protocols.

After developing the instruments, six individuals pretested the web-based survey, and personnel from the State of New Jersey pretested the interview protocols (attachment K). Pretest participants thought the survey was easy to answer and straightforward. The pretesting and feedback revealed inconsistent terminology at times. For example, one participant noted the SNAP eligibility system is inconsistently referred to as the management information system (MIS), eligibility system, and database throughout the survey. For consistency, the study team will use the term “SNAP eligibility system” and use MIS only as a reference or example of what the system might be called.

Changes were also made to reduce burden such as changing “select all that apply” questions to a “yes/no” format. The interview protocols flowed well and were completed within the allotted time. Minor changes were made to wording and section structure to provide clarity. For specific feedback and changes made to the web-based survey and interview protocols, please refer to attachment K.

After pretesting, subject matter experts identified additional changes to the survey to improve the quality of the data collected. We added three questions:

- Question 6 asked about screening applicants for both work registrant and ABAWD status. Since screening for work registrants and ABAWD status are often separate processes, we broke the question out to ask about work registrant and ABAWD status separately.
- For more robust information on verification, we added a follow-up to question 10 to gather information on how the verification requirements differ for work registrants and ABAWDs.
- To accommodate the requirements of the web survey application, we split question 39 into two questions, one on the factors considered in determining the types of services and the other on the factors considered in determining the location of services.

We also added two response choices to Question 8, work registration status and ABAWD status, since these are also key factors a State agency might consider when deciding who should be referred to E&T.

We also condensed six questions into an easier to process single question format. Questions 76 to 81 asked respondents to select between two factors that would be given more importance in making a hiring decision for a SNAP eligibility worker, each question using different combinations of four factors as response choices. For clarity, these six questions were condensed into a single question (question 76) that asks respondents to rank the four factors in order of importance. This change offsets any increase in burden resulting from the added questions.

Table A.8.1. Individuals Consulted Outside Agency

Name	Title	Organizational Affiliation
Lorrie B.	Deputy Assistant Secretary	Louisiana Department of Children and Family Services
Kate K.	State Strategies Director	National Skills Coalition
Amy N.	Director of Training and Technical Assistance	Actionable Intelligence for Social Policy
Bri N.	Senior Consultant	Seattle Job Initiative
Anastasia P.	SNAP Employment and Training Supervisor	State of Minnesota, Department of Health and Human Services
Jenny T.	Vice President Career Services	Goodwill of North Georgia
Ty C.	Vice President	Center on Budget and Policy Priorities
Manny R.	Executive Director	Revolution Workshop
Raintry S.	Deputy Director	Government Alliance on Race and Equity, Race Forward
Laura K.	Consultant	Nevada SNAP State Agency, retired
Pat M.	Consultant	Colorado SNAP State Agency, retired
Taci L.	Consultant	Nevada SNAP State Agency, retired
Sherry H.	Consultant	Nevada SNAP State Agency, retired
Kathy F.	Consultant	Utah SNAP State Agency, retired
Donna S.	Consultant	Nevada SNAP State Agency, retired

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.

No payment or gift will be provided to respondents.

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.

Personally identifiable information

In accordance with the Privacy Act of 1974, the study team will protect the privacy of all information collected for the study and use the information for research purposes only, except as otherwise required by law. FNS Privacy Officer, Wilson Moorer, reviewed this Information Collection Request on October 16, 2023, and determined the collection is not subject to the requirements of the Privacy Act.⁵ No information that identifies any study participant will be released. When reporting the results, data will be presented only in aggregate form, so individuals and institutions will not be identified. The study team will not maintain any personally identifiable information. All data will be kept in secured locations. Identifiers will be destroyed as soon as they are no longer required.

Assurances of privacy

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data and that their information will be kept private to the extent permitted by law through the informed consent process. The study team will comply with all Federal and departmental regulations for private information. The study team secured institutional review board approval through Westat June 19, 2023 (attachment L).

Data security and monitoring

⁵ A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* (April 25, 1991, vol. 56, no. 80, pp. 19078–19080) discusses the terms of protections the study team will provide to respondents. Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 U.S.C. 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.

The study team will protect respondent privacy to the extent permitted by law and will comply with all Federal and departmental regulations for private information. SNAP State agencies will submit data files using a web portal. Responses to the web-based survey and key informant interviews will be stored on the contractor's corporate servers. The contractor will employ the following safeguards to protect privacy during the study:

- ▶ Computer data files will be protected with passwords, and access will be limited to specific users on the study team.
- ▶ Employees must notify their supervisor, the project director, and the contractor's security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner.

The Confidentiality Pledge, in which employees of the contractor provide assurances to the safeguards described in this section, is provided in attachment M, Westat Insight Information Security and Confidentiality Pledge.

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.

No questions of a sensitive nature are included in this Information Collection Request. FNS Privacy Officer, Wilson Moorer, reviewed this Information Collection Request on October 16, 2023, and determined the collection is not subject to the requirements of the Privacy Act.

A.12. Estimates of Hour Burden, Including Annualized Hourly 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.

The estimated burden for this information collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden, is shown in attachment N. The time estimate in the burden table includes time for recruiting respondents, reading data collection materials such as emails, and responding to the data collection. The table includes both respondents and nonrespondents.

This information collection will have a total of 296 respondents (293 responsive and 3 nonresponsive⁶). The affected public includes 243 staff employed by State, local, or Tribal governments administering SNAP; 44 representatives of business for-profit and not-for-profit entities; and 6 individuals.

The total estimated annual burden is 366.32 hours (365.57 hours for responsive participants and 0.75 hours for nonresponsive participants). The estimated time of response varies from 0.03 hours to 1.5 hours depending on respondent group and activity. The estimated number of total annual responses is 1,248, and the estimated number of responses per respondent is 4.5.

For the web survey, the study team assumes that, in addition to the SNAP State Director, up to two additional staff may be delegated sections of the survey to complete (one SNAP State data analyst and one SNAP E&T Director). The total annual responses of 1,248 includes the time for the SNAP State Director and additional staff in each State to complete the survey and read emails and the time for State and local government staff, SNAP E&T providers, and other interested parties to participate in interviews. The estimate also includes time for the SNAP State Director and data analyst to submit documents as part of the survey.

For the interview component, the study team anticipates needing to ask up to nine States to participate, with the goal of including six States. The total annual responses estimate also

⁶ SNAP State Directors invited to participate in interviews are a subset of the directors participating in the survey. The study team anticipates that nine directors will be invited to participate in interviews and that three will decline to participate. The three nonrespondents are noted in attachment N but not double-counted in the sample size column.

includes the time for respondents to complete the survey and interview instrument pretests. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for record keeping or third-party disclosure.

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

The total annualized cost to respondents is \$23,814.28 (\$21,176.59 for SNAP State agency and local government staff, \$1,844.88 for business staff, and \$792.81 for individuals). 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 (fully loaded at 33 percent) for a corresponding occupation determined using the most recent available data from the U.S. Bureau of Labor Statistics, as table A.12.1 shows. Individuals are professional consultants; for these individuals, the Management Occupations occupational code, 11-0000, is used as the average hourly wage.

Table A.12.1. Description of Respondents and Hourly Earnings

Type of Respondent	Occupational Category	Average Hourly Earnings (Loaded at 33 Percent)
SNAP State Director	Management Occupations (11-0000)	\$88.09
SNAP E&T Director	Management Occupations (11-0000)	\$88.09
SNAP State Data Analyst	Database Administrators (15-1242)	\$67.02
Local SNAP Office Director	Other Management Occupations (11-9000)	\$75.69
Local SNAP Office Staff	Eligibility Interviewers, Government Programs (43-4061)	\$33.14
SNAP E&T Provider Staff	Community and Social Services Occupations (21-0000)	\$37.72
Interested Parties	Community and Social Services Occupations (21-0000)	\$37.72
Individuals	Management occupations (11-0000)	\$88.09

Source: U.S. Bureau of Labor Statistics. (2024). *Occupational employment and wage statistics: May 2023 occupation profiles*. U.S. Department of Labor. https://www.bls.gov/oes/current/oes_nat.htm.

A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

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 startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.

No capital, startup, or ongoing operational and maintenance costs are associated with this information collection.

A.14. Annualized Cost to 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 \$646,363.18 over a 40-month period, or \$193,908.95 on an annualized basis. The largest cost to the Federal Government is to pay a contractor \$579,949⁷ to conduct the study and deliver data files. The information collection also assumes a total of 150 hours of Federal employee time per year to manage the study: for a GS-13, step 5, in the locality of Washington, DC, at \$64.06 per hour for a total of \$32,030 (or \$42,599.90 for fully loaded wages). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management effective January 2024.

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 new information collection will add 366.32 burden hours and 1,248 annual responses to the OMB information collection inventory.

⁷ The contractor costs include fully loaded wages.

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.

SNAP State agency web survey and document review data collection will begin 2 months after OMB approval and will last 4 months. Four months is sufficient time for SNAP State agency staff to complete the survey at their convenience while also facilitating phone follow-up with nonrespondents. After the data collection has ended, the study team will abstract the relevant information from the document review in an Excel tool. Information abstracted will then be coded and consolidated with the SNAP State agency web-based survey and relevant extant data.

The study team will use quantitative methods to analyze the compiled data. Analyses will be conducted using a statistical software package, such as SAS or Stata. Through univariate and bivariate descriptive analyses, the SNAP State agency web survey will address research questions from study objectives 2 and 3, while the document review will address research questions across all four study objectives (attachment B).

Key informant interviews will begin after the completion of the SNAP State agency web-based survey and document review data collection. Interview teams will document preliminary findings and transcribe all interviews. Data will be coded and analyzed using NVivo to identify patterns and interpret findings. Findings from the key informant interviews will address research questions from the four study objectives.

Results will be presented in a final report, which will be made public on the [USDA FNS Research & Analysis website](#). The report will include a synthesis of the survey, document review, and interview findings. A Technical Working Group will review a draft, and their feedback will be incorporated into the next version.

The schedule for data collection, tabulation, and publication appears in table A.16.1.

Table A.16.1. Project Time Schedule

Activity	Months After OMB Approval	Estimated Date (Assuming August 2024 OMB Approval)
Conduct data collector training	1 month	September 2024
Conduct State web-based survey and document review data collection	2-4 months	October 2024–December 2024
Conduct key informant interview data collection	6-8 months	February 2025–April 2025
Code, process, and analyze data	5-10 months	January 2025–June 2025
Deliver draft report	13 months	September 2025
Deliver revised reports	14 and 15 months	October and November 2025
Briefing	15 months	November 2025
Deliver final reports	17 months	January 2026
Deliver final data files and documentation	17 months	January 2026

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

If seeking approval not to 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 Certification for Paperwork Reduction Act Submissions

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

There are no exceptions to the certification statement.