C. Project Summary for Assessment of the Administrative Costs of Electronic Healthy Incentives Projects (eHIP)

ASSESSMENT OF THE ADMINISTRATIVE COSTS OF ELECTRONIC HEALTHY INCENTIVES PROJECTS (eHIP)

Project Summary

Section A. Study Overview

1. Brief overview

The Food and Nutrition Service (FNS) is interested in understanding the costs of integrating nutrition incentive programs into State electronic benefits transfer (EBT) systems. FNS is also interested in understanding how these costs are different from the costs of setting up and running incentive programs that are not integrated in EBT systems. FNS contracted Westat to conduct a study that will collect cost data on three Electronic Healthy Incentives Projects (eHIP) and break down these costs by what the cost is for (for example, changing EBT systems), who is incurring this cost (the State, EBT processors, retailers, or someone else), and whether this is a one-time cost of setting up the project or an ongoing cost of administering eHIP. The study will also estimate the costs of expanding eHIP nationwide as well as estimate the return-on-investment (ROI) of eHIP compared with the ROI of non-EBT integrated nutrition incentive projects.

There will be two types of data collection: administrative data collection from the three eHIP States and qualitative data collection with eHIP representatives from the three States and their partners. The administrative data collection will not include any human subjects; data collected will be cost data covering State and partner expenditures.

The qualitative data collection will consist of virtual (video) interviews with representatives from the three States and partner EBT processors, retailers, and third-party processors (TPPs). These interviews will be conducted in order to answer any questions the study team has about administrative data collected; to estimate costs that were not included in the administrative data collection; to estimate factors that would determine the cost of expanding eHIP nationwide; and to identify lessons learned by eHIP States and their partners from eHIP implementation and administration. We are seeking IRB approval for the qualitative data collection.

2. Research activities undertaken by Westat

Westat is the prime on this contract and will undertake the following activities:

- Establish Data Use Agreements with the three eHIP states;
 - o This will occur between March 2023 and March 2025.
- Develop, pretest, and finalize administrative data templates and interview guides;
 - Administrative data templates and interview guides will be pretested with up to 9 state SNAP office representatives. This will occur in March 2024.
 - The templates and guides will be finalized based on the results of the pretest and submitted with the OMB package.
- Develop OMB package;
 - o The OMB package will be submitted in May 2024.
- Collect administrative and qualitative data;
 - Three rounds of administrative data collection and two rounds of qualitative data collection will occur between March 2025 and May 2026.
- Conduct quantitative and qualitative analyses;
 - o This will occur on a rolling basis through April 2027.
- Produce a final report and deliver a briefing for FNS staff;
 - o These will occur Between April and July 2027.
- Submit data sets and related documentation.
 - o These will be submitted in July 2027.
- 3. Partners and their roles

Westat has three expert advisors on this project—Amy Yaroch, Gary Glickman, and Peter Relich. All three will provide input into the study plan, data collection instruments, analyses, and final report. Dr. Yaroch will also provide expertise on non-EBT-integrated programs. None of the expert advisors will be directly involved in data collection.

- 4. This study does not involve an experiment with treatment and control conditions.
- 5. Human subjects for the qualitative data will include interviews with program staff from the three eHIP states as well as staff from partner organizations including EBT vendors, retailers, and Third Party Processors. In order to be included, respondents must have been working on the eHIP project. We will be asking states and organizations to designate respondents that have knowledge of the eHIP work.

Section B. Informed Consent Process

1. Informed consent process

Qualitative interview respondents will be sent the informed consent information ahead of the interview. At the interview, the interviewer will read the informed consent information to each respondent. The interviewer will ask the respondent if they have any questions and answer these questions. The interviewer will ask the respondent if they consent to the interview. If the respondent consents, the interviewer will ask if the respondent agrees to have the interview recorded. If the respondent agrees, the interviewer will turn on the recorder and ask the respondent to state for the recording that they consent to the interview and they consent to be recorded. If the respondent does not consent to the interview, the interviewer will thank them and end the interview. If the respondent consents to the interview but not to the recording, the interviewer will take detailed notes on the respondent's answers.

Interview respondents who consent will be asked to email a signed copy of the informed consent sheet to the interviewer after the completion of the interview (so that they may sign after asking all their questions).

2. Incentives

Respondents will not be provided with any incentives for participation.

3. Waivers

The project is not requesting any waivers or modifications.

Section C. Risks

There is little risk to interview respondents to being part of this study. We will use all data we collect only for the purposes we describe. FNS has directed all the eHIP states to participate in the cost study. While we will be comparing the costs of the eHIP projects across states, the results of this study will have no impact on the eHIP project funding or on any future funding each state receives. FNS knows that we will be interviewing individuals from all the eHIP states. However, we will not be revealing to FNS the names or positions of the people interviewed in each state. We will be presenting the results of these interviews in aggregate. Names will not be linked to responses. In our reports, we may include direct quotes, but these will be presented without the speaker's name, position, organization, or state so that report readers should not be able to identify speakers.

We will not be asking any personal questions of respondents; questions will only cover costs incurred by the state or partner and the work that was done for the project. We do not anticipate these questions raising any physical, psychological, or emotional harm or discomfort. However, we will still be assuring respondents that they may skip any question they do not wish to answer and they can end the interview at any time.

We believe any minor risks are reasonable in relation to the benefits. There is little risk of discomfort and we will minimize any risk of loss of privacy or loss of anonymity by aggregating responses and not reporting names or positions of those interviewed in our reports or to FNS. The study may benefit respondents, meanwhile, by providing them with information from others about lessons learned and about the costs incurred on the eHIP projects by other states.

Section D. Benefits

Direct benefits to respondents are knowledge about how the costs and return on investment of the state eHIP project they worked on compare with the costs and return on investment of other eHIP projects, as well as non-EBTintegrated nutrition incentive projects. This information may help them in administering eHIP in the future or in working on other, similar programs.

Indirect benefits include knowledge about the types of costs involved in implementing and administering eHIP, lessons learned about costs, and information about returns on investment of these types of programs. This information will help other states considering implementing eHIP as well as federal policymakers considering whether and how to fund eHIP-type programs.

Section E. Confidentiality, Data Security, and Destruction Procedures

Interview respondent confidentiality will be maintained multiple ways. First, all project materials, including respondent information, will be stored on Westat's secure server, with only project staff having access. Second, names and positions of respondents will be stored separately from interview data. There will be one spreadsheet with the names and positions of respondents tied to a respondent ID. Recordings, notes, and transcripts of interviews will use only the respondent ID, not name or position. Transcripts will be de-identified to ensure that respondent confidentiality is maintained. This includes removing any names and positions from the transcript, but will also include broader de-identification before transcripts are provided to FNS (the client). We will turn over to FNS only the portion of the transcript where the respondent discusses lessons learned, to further reduce the likelihood that respondent identity could be determined.

FNS will own the data, with the exception that Westat will de-identify interview data before turning it over to protect the confidentiality of interview respondents.

Westat will destroy identifiable data three years after the completion of the project.