

Supporting Statement Part B

OMB No. 0584-[NEW]

Assessment of Administrative Costs of Electronic Healthy Incentives Projects

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Part B. Collection of Information Employing Statistical Methods

B.1. Respondent Universe and Selection Methods

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection method to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

B.1.1. Respondent Universe

This study will collect administrative project cost data on the three Supplemental Nutrition Assistance Program (SNAP) electronic benefits transfer (EBT)-integrated healthy incentives projects (eHIP); conduct in-depth interviews with essential eHIP staff; gather extant publicly available national and State data on SNAP-relevant characteristics; and collect administrative grantee data from Gus Schumacher Nutrition Incentive Program (GusNIP, formerly the Food Insecurity Nutrition Incentives (FINI) Grant Program). Using the data collected, the study has the following objectives: quantify, to the extent possible, the cost of administering eHIP; estimate the cost of nationwide expansion of eHIP; and (if possible) compare the cost of administering eHIP to the cost of administering GusNIP (another incentive program for SNAP households that does not use EBT integration) using the GusNIP administrative grantee data.

- ▶ **Administrative project cost data collection:** The respondent universe for this administrative data collection includes the SNAP State agencies of Colorado, Louisiana,

and Washington—the three States that received eHIP grants. All three SNAP State agencies are expected to provide administrative data.

- ▶ **Interview data collection:** The respondent universe for the in-depth interviews includes essential staff from the Colorado, Louisiana, and Washington SNAP State agencies, EBT processor staff from the two EBT processors working with the three eHIP project States, third-party processor (TPP) staff from TPPs working with the three eHIP States, and retailer staff from participating retailers operating within the three eHIP States and participating in the eHIP project. Within each State, the study expects responses from 2 State staff (6 State staff total). In addition, the study expects to have responses from 6 retailer staff for each eHIP State (18 retailer staff total), as well as 2 TPP staff for each eHIP State (6 TPP staff total). Finally, the study expects responses from 2 EBT processor staff, 1 each from the two EBT processor firms working with the three eHIP States.
- ▶ **Extant national and State data:** This part of the data collection involves collecting publicly available national and State data. There is no relevant respondent universe.
- ▶ **Administrative GusNIP grantee data collection:** The respondent universe for the administrative GusNIP grantee data collection includes all GusNIP grantees. The study team anticipates gathering data from up to 12 GusNIP grantees, with one respondent per grantee.

B.1.2. Selection Methods

Administrative project cost data collection

This administrative data collection (see appendices F-H) gathers information from all three SNAP State agencies that received eHIP grants. SNAP State agencies will be sent an electronic letter requesting they provide the appropriate administrative data (see appendix D).

Interview data collection

The study sample for the interview data collection will be purposefully drawn by the study team to include staff members essential to and with intimate knowledge of the eHIP project and its processes within their respective entities (SNAP State agencies, EBT processors, TPPs, and retailers). The study team will work with senior staff within these entities to identify these essential staff members. The sample for interviews will also likely include some element of convenience sampling to accommodate the availability and schedules of essential staff members at these entities. The study team anticipates that more essential staff than the target number of complete interviews by entity will be available, allowing for this convenience sampling method.

The study team will select retailers using purposive and convenience sampling procedures. The team will work with State eHIP staff to compile a list of retailers of different types (e.g., grocery stores versus superstores), of different sizes (i.e., major chains, smaller chains, and independent retailers), with different experiences with nutrition incentives (e.g., those with and those without prior experiences), in different locations within State, and having any special circumstances, such as farmers' markets and community-supported agriculture arrangements. The team will then select three retailers per State (expecting two interviewees per retailers) with desired characteristics and availability to participate in these interviews to be in the sample of interviews.

Table B.1.1 shows the target number of completed interviews for staff members by entity. The study team will conduct two rounds of interviews with each interviewee. If the original interviewee is no longer available when we conduct the second round of interviews, we will conduct that second interview with another individual of that same staff type.

Table B.1.1. Target Completes for In-Depth Interviews

Affected public	Entity	Target number of interviewees		Target number of completed interviews	
		Per State	Total	Per State	Total
State government	SNAP State Agency	2	6	4	12
Businesses	EBT processor*	2	2	4	4
	TPP	2	6	4	12
	Retailer	6	18	12	36

*One EBT processor serves two project States and the second serves the third project State.

Sampled staff members within entities will be notified of the study by the study team. They will be sent email requests to schedule their interviews (see appendices I and J), and they will be sent email reminders about their interviews (see appendix K).

Extant national and State data

This part of the data collection involves collecting publicly available national and State data. These data are likely to include numbers of SNAP retailers, publicly available wage rates for State employees and those in industries involved in eHIP activities, and aggregate SNAP caseloads, among others. There are no relevant sample selection methods.

Administrative GusNIP grantee data collection

The study team will work with FNS to select up to 12 GusNIP grantees to use as comparisons with eHIP projects. Selection criteria include (but are not limited to): GusNIP incentive structure, State, urbanicity of GusNIP program, and approximate size of GusNIP program (as

measured by number of incentives issued).¹ Sampled GusNIP programs will be sent an electronic request for transmission of previously collected administrative cost data (appendix P).

B.1.3. Estimated Number of Respondents

This study will gather data through administrative project cost data, interviews with essential staff, extant national and State data, and administrative GusNIP grantee data. This new information collection will have 47 respondents (6 SNAP State agency staff for the pretest; 3 SNAP State agency staff for the administrative project cost data; 6 SNAP State agency staff for the essential staff interviews; 2 EBT processor staff for the essential staff interviews; 18 retailer staff for the essential staff interviews; 6 TPP staff for the essential staff interviews; and 12 GusNIP staff for administrative data collection). It is anticipated that of the 50 contacted, all will be responsive. Table B.1.2 provides the breakdown of respondents by respondent type and the expected response rate. Appendix U provides a full breakdown of respondents.

Table B.1.2. Breakdown of Respondents and Nonrespondents by Respondent Type

Respondent Type		Total Contacted	Number of Respondents	Number of Nonrespondents	Response Rate
Administrative Project Cost Data					
State SNAP Agency	Pretest participants	3	3	0	1.00
	eHIP Director	3	3	0	1.00
Essential Staff Interviews					
State SNAP Agency	Project staff	6	6	0	1.00
Businesses	EBT Processors	2	2	0	1.00
	Retailers	18	18	0	1.00
	TPPs	6	6	0	1.00
	GusNIP Grantees	12	12	0	1.00
Total (unique)		50	50	0	1.00

¹ For eHIP projects that are nascent/ongoing, the study team will examine their growth over time of incentives issued up to the current period and estimate their project size at a point of maturity discussed with and agreed upon by the FNS COR.

B.2. Procedures for the Collection of Information

Describe the procedures for the collection of information including:

- 1. Statistical methodology for stratification and sample selection**
- 2. Estimation procedure**
- 3. Degree of accuracy needed for the purpose described in the justification**
- 4. Unusual problems requiring specialized sampling procedures**
- 5. Any use of periodic (less frequent than annual) data collection cycles to reduce burden**

None of the data collection procedures use statistical sampling or estimation methodologies.

Therefore, degree of accuracy and specialized sampling are not applicable. The extant national and State data and administrative GusNIP grantee data collections are one-time data collections, and concerns about the periodicity of data collection cycles are not applicable. The administrative project cost data and interview data collections will be collected three and two times, respectively. The information collection procedures used for these tasks are described below.

Administrative project cost data collection

SNAP State agency project directors will receive a unique URL granting them access to a secure-file-upload web address where all administrative data can be submitted.

The cost data will include administrative costs, incentives issued, and qualifying fruit and vegetable purchases. The study team proposes three rounds of cost data collection: one, the project launch round, would occur upon project go-live launch or receipt of OMB approval (whichever is later); one, the interim round, would occur approximately 6 months after the project launch round; and the last, the final round, would occur approximately 6 months after the interim round. Actual intervals between data collection will depend upon when the States launch their programs. The study team chose three discrete rounds of cost data collection to minimize burden on States and their partners. This schedule should be less disruptive to their operations than requesting data more frequently; however, the study team will accept data from States submitted more frequently than the proposed schedule. Each State is expected to coordinate data submission from all entities (including retailers, EBT processors, and TPPs). However, the study team will work with individual entities if needed.

The study team will provide a secure website and protocol for submitting these data to protect the confidentiality of the data (particularly the firm-level and store-level data on retailer costs, incentives, and qualifying purchases). The team will receive and review data on an ongoing basis during the pre-live and live operations phases of the project; and follow up as needed with the States, including probes during the staff interviews (after operations go live and later).

Interview data collections

The study team will use narrowly focused modular interview guides to conduct essential staff interviews. Essential staff are staff members with detailed knowledge of the eHIP project and its processes. The study team will select staff with these characteristics who likely can confirm and enhance understanding of the eHIP project, discuss additional costs and funding sources not known to the study team at the onset, and provide lessons learned during the project. The study team proposes two rounds of interviews. The first round will be scheduled shortly after the launch of each eHIP project and receipt of the first round of administrative project cost data. The second round of interviews will be scheduled toward the end of data collection. When appropriate, the study team may schedule group interviews with multiple respondents who fall into the same category. For example, it is likely that the study team will try to interview the TPP project manager and TPP systems lead together, as their work on the project will substantially overlap. The team anticipates interviewing different retailers participating in the project separately in each State to ensure that confidentiality about any proprietary business processes they share in interviews is maintained.

All interviews will be conducted based on the interviewees' schedules and by their choice of teleconference or videoconference, using Federally approved, secure video-conferencing software. The interview guides will be tailored prior to interviews with information specific to the respondent's position and the project State to maximize relevancy and clarity for the respondent. The interviewers will send respondents information on the interview ahead of time, including any specific questions about cost data received that may require the respondent to prepare before the interview. This should reduce the burden on respondents by preventing unplanned and exigent time required to address known matters after the interview. During the

interview, interviewers will share their screens to show respondents the cost data they are discussing as well as the conceptual cost model for estimating the costs of implementing and administering eHIP when appropriate. Seeing the cost model should improve interviewees' thought processing regarding the disparate elements of total project costs. Collectively, these steps should reduce burden on interviewees.

Extant national and State data

The study team will collect publicly available extant data on State and national characteristics. These data are likely to include numbers of SNAP retailers, wage rates for State employees and those in industries involved in eHIP activities, and aggregate SNAP caseloads, among others. The team will identify all sought-after data elements and their source(s) in one document and will log the completeness of these data and any other information necessary for proper attribution in analyses.

Administrative GusNIP grantee data collection

The study team will meet with the National Institute of Food and Agriculture (NIFA) to ascertain what data they may share from GusNIP grantees, with the consent of the GusNIP grantees. The team will also work with the Gus Schumacher Nutrition Incentive Program Training, Technical Assistance, Evaluation, and Information Center (NTAE) to contact GusNIP grantees to gain their permission to share NTAE data, again with the consent of the GusNIP grantees. Once the selection criteria for GusNIP comparisons is finalized, the study team will work with NIFA, NTAE, and the GusNIP grantees themselves to collect cost data. The team will reach out to the sampled GusNIP grantees and ask them to submit to the study team previously collected cost data, including from financial reporting submitted to NIFA and NTAE. GusNIP grantees will be

offered the same secure data transfer protocols as for the administrative project cost data collection and the study team will review data as it is received.

B.3. Methods to Maximize Response Rates and the Issue of Nonresponse

Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

B.3.1 Methods to Maximize Response Rates

The study team has extensive experience conducting studies and providing technical assistance on SNAP. The team’s familiarity with agency staff and program administration will facilitate collection of the administrative data and completion of the interviews. For GusNIP administrative data collection, the team is also working with NIFA and NTAE to maximize cooperation of GusNIP grantees. The study team will work with SNAP State agencies (and EBT processors and TPPs if appropriate) to identify cooperative and responsive retailers in the compiled purposive list of potential retailers for interview. It is expected that the three SNAP State agencies that received eHIP grants and GusNIP grantees will provide the requested administrative data, all selected eHIP project SNAP State agency, EBT processor, retailer, TPP, and GusNIP grantee staff will complete interviews, and GusNIP grantees will provide all requested administrative GusNIP grantee data. The study team will send the three eHIP project SNAP State agencies requests for administrative cost project data beginning immediately upon receipt of OMB approval. See appendices D-H for the initial data request letter and for the administrative data templates. We expect 100 percent response rate for the administrative

data collection for these States, as their participation in the eHIP project requires cooperation with this eHIP cost evaluation (OMB 0584-0512). Among SNAP State agency, EBT processor, retailer, and TPP staff selected for participation in-depth interviews, and GusNIP grantee staff interviewed to clarify the administrative grantee data, relevant staff members will be sent email schedule requests and reminders about their interviews (see appendices I-K). GusNIP grantees will be sent a data request letter (see appendix P).

B.3.2. Nonresponse Bias Analysis

Because it is expected that all SNAP State agencies and GusNIP grantees will provide the requested administrative data, and all selected SNAP State agency, EBT processor, retailer, and TPP staff will complete interviews, conducting a nonresponse bias analysis is not applicable. Further, because the goal of the project is not a representative sample but rather an examination of specific State costs, a nonresponse bias analysis would not be appropriate even if the response rate were less than 100 percent.

B.4. Tests of Procedures

Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of tests may be submitted for approval separately or in combination with the main collection of information.

The administrative project cost data templates and incentive report templates were pretested with six respondents from the eHIP project States. This approach is consistent with the Office of Information and Regulatory Affairs' guidance on this topic. The overarching objective of the pretest was to ensure the instruments were clear and understandable to respondents. For the

cost templates, respondents were asked to review the instrument and then, over the course of a two-hour interview, were asked to provide feedback regarding what they think each item of the cost template is asking for, whether any item is unclear, and about how they would go about finding values for the cost template items. They were also asked if there are types of project costs not included in the templates that they think is important to include. See appendix V for the pretest protocol. For the extant national and State data and the administrative GusNIP grantee data collections, there are no instruments for collecting data, thus pretesting is not applicable.

As a result of the pretest, the study team made several revisions to the cost templates including adjusting question text and clarifying instructions. The pretest confirmed that initial burden estimates for the instruments were accurate. Some of the other overall findings included revising terminology and using more plain and concise language. Appendix W details the pretest methods and findings.

B.5. Consultants

Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

FNS consulted with a mathematical statistician from USDA's National Agricultural Statistics Service (NASS), who reviewed the study methodology and procedures (see table B.5.1). The review from NASS and the study team's response to NASS's comments appear in appendices Q and R. FNS has contracted with Westat to assist in conducting this study. Table B.5.1 lists the names and contact information of individuals consulted on aspects of the design and the

Westat team members responsible for the collection and analysis of the study data. The Project Officer for the contract providing funding for the study, Dr. Kathleen Patton, will be responsible for receiving and approving all contract deliverables.

Table B.5.1. Consultants

Name	Title	Organizational Affiliation	Email Address	Phone number
Prakash Adhikari	Mathematical Statistician	National Agricultural Statistics Service	Prakash.Adhikari@nass.usda.gov	202-720-5467
Kathleen Patton	Social Science Research Analyst	USDA FNS	Kathleen.Patton@usda.gov	703-305-2813
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