Supporting Statement Part A

OMB No. 0584-[NEW]

Assessment of Administrative Costs of Electronic Healthy Incentives Projects

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A1. 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. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a request for a new one-time data collection. This data collection will be conducted over a single (approximately) 15-month period, with multiple discrete instances of data collection within that period. The U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) is authorized to collect these data under Section 17 of the Food and Nutrition Act of 2008 (appendix A), which authorizes the Secretary of Agriculture to contract with private institutions to undertake research that will help improve the administration and effectiveness of the Supplemental Nutrition Assistance Program (SNAP) in delivering nutrition-related benefits.

SNAP is the largest hunger safety net program in the United States, providing food assistance benefits to about one in eight Americans. However, SNAP participants have been reported to consume lower quality diets and fewer fruits and vegetables than non-participants; and have been reported to have less fruit and vegetable consumption than the general public.[1] The cost of healthy foods is a barrier for families on SNAP who are trying to improve their diet quality.[2,3] Financial incentives provided through SNAP for purchasing fruits and vegetables can lower the price and increase the purchase of fruits and vegetables by families on SNAP.

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[1] Zhang, F.F., Liu, J., Rehm, C.D., Wilde, P., Mande, J.R., and Mozaffarian, D. (2018). Trends and disparities in diet quality among US adults by Supplemental Nutrition Assistance Program participation status. *JAMA Network Open*, 1(2), e180237. doi:10.1001/jamanetworkopen.2018.0237.

[2] Blumenthal, S.J., Hoffnagle, E.E., Leung, C.W., Lofink, H., Jensen, H.H., Foerster, S.B., Cheung, L.W., Nestle, N., and Willett, W.C. (2014). Strategies to improve the dietary quality of Supplemental Nutrition Assistance Program (SNAP) beneficiaries: An assessment of stakeholder opinions. *Public Health Nutrition*, 17(12), 2824-2833.

[3] Gearing, M., Dixit-Joshi, S., and May, L. (2021). Barriers That Constrain the Adequacy of Supplemental Nutrition Assistance Program (SNAP) Allotments: Survey Findings. https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-Barriers-SurveyFindings.pdf

Since 2011, USDA's Food and Nutrition Service (FNS) and the National Institute of Food and Agriculture (NIFA) have explored various aspects of SNAP nutrition incentives, including different implementation models, incentive amounts, and distribution methods. From 2011 to 2012, FNS's Healthy Incentives Pilot (HIP) credited randomly selected SNAP participants' electronic benefits transfer (EBT) cards 30 cents for every SNAP dollar spent on qualifying fruits and vegetables. Evaluation findings indicated these incentives increased fruit and vegetable consumption by a quarter cup per day.[4] Starting in 2015, the Gus Schumacher Nutrition Incentive Program (GusNIP), formerly the Food Insecurity Nutrition Incentives (FINI) Grant Program) administered by NIFA has provided funds to grantees to develop, test, and implement various incentive models for increasing purchases of fruits and vegetables. These incentives increased purchases of fruit and vegetables, and they were used more often when provided as electronic point-of-sale (POS) discounts instead of rebates (e.g., coupons).[5,6]

With the passage of the American Rescue Plan Act of 2021, FNS was allocated $25 million to enter into agreements with States to implement projects integrating nutrition incentives with SNAP EBT systems. In Fiscal Year 2023 FNS awarded grants to three States, Colorado, Louisiana, and Washington for implementing Electronic Healthy Incentives Projects (eHIP) to leverage EBT integration to deliver financial incentives at point of purchase to SNAP households when they purchase qualifying fruits and vegetables.

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[4] Bartlett, S., Klerman, J., Olsho, L., Logan, C., Blocklin, M., Beauregard, M., and Enver, A. (2014). Evaluation of the Healthy Incentives Pilot (HIP): Final report. https://fns-prod.azureedge.us/sites/default/files/ops/HIP-Final.pdf.

[5] Vericker, T., Dixit-Joshi, S., Taylor, J., May, L., Baier, K., and Williams, E.S. (2021a). Impact of food insecurity nutrition incentives (FINI) on household fruit and vegetable expenditures. *Journal of Nutrition Education and Behavior*, 53(5), 418-427.

[6] Vericker, T., Dixit-Joshi, S., Giesen, L., Gearing, M., Manglitz, C., Baier, K., Lee, H., and May, L. (2021b). *Evaluation of the implementation of food insecurity nutrition incentives (FINI): Final report.* https://fns-prod.azureedge.us/sites/default/files/resource-files/FINIReport.pdf.

USDA FNS funded this study, separate from the eHIP project, to calculate the costs of eHIP in the three States to determine the startup and ongoing costs of administering incentives to SNAP households through EBT integration and to estimate the cost of administering eHIP at scale.

A2. Purpose and use of the information: Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

Purpose and use of information. This study, conducted by Westat, will provide FNS with a comprehensive understanding of the costs of eHIP. This will provide information to FNS as it considers nationwide expansion of eHIP. Table A2.1 provides the objectives and associated research questions. The information collected will be used to complete these objectives.

Table A2.1. Study Objectives

Study objectives
Objective 1: Quantify, to the extent possible, the cost of administering eHIP.
Identify and determine:
a. The cost of each eHIP project, overall and disaggregated by function (e.g., State administrative expenses, EBT and retailer systems changes, retailer recruitment, project promotion, incentive payments).
b. Resources FNS, State agencies, EBT processors, retailers, and other stakeholders committed to implement eHIP, by project.
c. Additional funding and/or in-kind contributions used for the projects, and what these resources were put toward.
d. Costs primarily associated with the initial start-up.
e. Costs associated with ongoing administration.
f. How many incentives were issued (by total dollar value and number of transactions), how many households were issued incentives, and, how issuance varies by project features, including incentive model, incentive amount, retailer type, and geography.
g. How many incentives redeemed (by total dollar value and number of transactions), how many households redeemed incentives, and, how redemption varies by project features, including incentive model, incentive amount, retailer type, and geography.

Table A2.1. Study Objectives, continued

Study objectives
Objective 2: Estimate the cost of nationwide expansion of eHIP.
Identify and determine:
a. The projected costs of eHIP nationwide, overall and disaggregated by function and stakeholder.
b. The costs that would be primarily associated with the initial start-up.

Study objectives
c. The costs that would be associated with ongoing administration.
d. Factors that would help to reduce the cost of scaling eHIP nationwide.
Objective 3: If possible, compare the cost of administering eHIP to the cost of administering other incentive programs for SNAP households that do not use EBT integration.
Identify and determine:
a. How start-up costs differ between eHIP and other incentive programs for SNAP households.
b. How the costs associated with ongoing administration, following initial start-up, differ between eHIP and other incentive programs for SNAP households.
c. The ROI cost for eHIP compared to other incentive programs that do not use EBT integration.

From whom and how the information will be collected. To achieve the study objectives, the study team will use four sources of data: administrative data related to project costs, interviews with State and other project entity representatives, extant national and State data, and administrative data from GusNIP grantees. All components of the data collection are voluntary. Table A2.1 provides an overview of the data collection activities; appendix B provides a more detailed crosswalk between research objectives, research questions, and data collection activities; appendix C provides a project summary. Additional detail on each data collection activity follows.

Table A2.2. Overview of Data Collection Activities

Instrument	Affected Public	Respondent Type	Method of Collection	Total time per round of data collection (total time across all rounds of data collection)	Study Objectives Addressed
Administrative project cost data collection (appendices D-H)	State government[a]	Three SNAP State agency project directors[a]	Web file upload	7 hours for each of three rounds of data collection (21 hours total)	All

Table A2.2. Overview of Data Collection Activities, continued

Instrument	Affected Public	Respondent Type	Method of Collection	Total time per round of data collection (total time across all rounds of data collection)	Study Objectives Addressed
Interview data collection (appendix I-L)	State government	Two SNAP State agency project staff per State	Videoconference or teleconference	90 minutes per respondent per round; 180 minutes total per respondent across all rounds)	All
Interview data collection (appendix I-L)	Businesses	Two EBT processor staff[b]; and, two TPP staff, six retailer staff within each of the three States	Videoconference or teleconference	60–90 minutes per respondent per round; 120 – 180 minutes total per respondent across all rounds	All
Extant national and State data	N/A	N/A	Publicly available web file download	N/A	2
Administrative GusNIP grantee data collection (appendix P)	Businesses	One staff member from each of twelve GusNIP grantees	Web file upload	70 minutes per respondent	3

[a] Each State is expected to coordinate data submission of administrative project costs from all relevant entities (including retailers, EBT processors, and TPPs). However, the study team will work with individual entities if needed.
[b] One EBT processor serves two project States and the second serves the third project State.

1. **Administrative project cost data collection**. SNAP State agency project directors will receive an electronic letter from the study team describing the request for project administrative data and providing instructions for completing the request (appendix D). The study team will provide directors a unique URL granting them access to a Federally approved secure-file-upload web address where all administrative data can be submitted (appendices D-H).

The cost data will include administrative costs, incentives issued, and qualifying fruit and vegetable purchases. The study team will conduct three rounds of cost data collection: the project launch round, would occur upon project go-live launch or receipt of OMB approval (whichever is later); the interim round, would occur approximately 6 months after the project launch round; and the final round, would occur approximately 6 months after the interim round. Actual intervals between data collection will depend upon when the three project 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 if preferred. 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 Federally approved 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).

2. **Interview data collection**. The study team will use narrowly focused modular interview guides to conduct essential staff interviews with staff from SNAP State agencies, EBT processors, retailers, and TPPs via teleconference or videoconference, based on each respondent's preference, using Federally approved, secure video-conferencing software. 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 will work with senior staff within the study entities (SNAP State agencies, EBT processors, retailers, and TPPs) to identify these essential staff members. The study team will send identified staff members an electronic letter requesting to schedule an interview (appendix I). After this, the study team will send identified staff members additional electronic letters with a reminder to schedule an interview (appendix J) and a reminder about their scheduled interview (appendix K). Prior to the interview, the team will send staff members the interview consent form (appendix N) and after the interview they will send a follow-up and thank you note (appendix O).

The team will tailor the interview guides for each respondent based on the data received that needs to be reviewed with the respondent to minimize burden. The team will include material in the interview guides that seek to gather missing information on project costs, clarify unclear data and confirm understanding of the data, and elicit lessons learned by staff members that are not easily reflected in the data templates provided to SNAP State agencies. During the interviews, the interviewer will also walk respondents through cost estimates that the respondents omitted in the administrative data collection through worksheets.

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 first round of interviews is scheduled to occur over a four-month period. These interviews will focus on understanding implementation and start-up costs and will include mostly questions about cost data received from project States. The second round of interviews will be scheduled toward the end of data collection and will include questions about the cost data as well as about relevant lessons learned about the project over the course of implementation as could inform cost-effective expansion beyond the initial eHIP projects. The second round of interviews is scheduled to occur over one month.

These interviews with eHIP State agencies and their partners will complement the administrative project cost data collection by confirming and enhancing understanding of the information received from the cost data templates, allowing the team to make any needed changes to analyses; by capturing additional costs and funding sources not provided in the cost data; and by compiling lessons learned to identify best practices, challenges faced, and cost considerations likely to be faced with additional eHIP expansion. 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 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. Table A2.2 notes the essential staff interviews; interview recruitment protocols appear in appendices I-K, interview protocols appear in appendices L-O, and the pretest protocol, methods, and summary of findings appear in appendices V-W. Table A2.3 notes the target number of interviewees and completed interviews.

Table A2.3. Interview data collection with essential staff

Affected Public	Respondent Category	Possible Staff Roles	Interview Topics	Number of Interview Rounds per State	Length of Interview
State government	SNAP State agency	■ Project manager ■ SNAP data manager ■ Customer service lead ■ eHIP promotion lead ■ Accounting representative	■ Administrative cost data elucidation ■ Unexpectedly large costs* ■ Additional costs and funding sources not in administrative cost data* ■ Staff hours and hourly rates† ■ System changes, project management, and accounting and customer service costs† ■ Other sources of eHIP funding (e.g., SNAP operating funds, State general funds, outside organization grant funds) ■ Costs going forward (e.g., growth rate of future costs) ■ Expansion cost estimates (e.g., factors driving ongoing costs) ■ Lessons learned	2	60 - 90 minutes
Businesses	EBT processor	■ Project manager ■ Systems lead ■ Certification lead ■ Customer service lead			
	TPP	■ Project manager ■ Systems lead ■ Certification lead			
	Retailer	■ Project manager ■ Systems lead			

* Asked only of SNAP State agency staff.
† Asked only of EBT processors, TPPs, and retailers.

Table A2.4. Target Completes for In-Depth Interviews

Affected public	Entity	Target number of interviewees		Target number of completed interviews (over two rounds)	
		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.

3. **Extant national and State data**. To help address study objective 2, 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.

4. **Administrative GusNIP grantee data collection**. The study team will work with FNS to determine the analytic approach for eHIP to GusNIP comparison and selection criteria for GusNIP grantees. The team will meet with NIFA and the Gus Schumacher Nutrition Incentive Program Training, Technical Assistance, Evaluation, and Information Center (NTAE) to ascertain what data they may share about GusNIP grantees with the grantees' consent. The team will also work with NTAE to contact up to 12 GusNIP grantees to gain their permission to share NIFA and NTAE data. The team's selection criteria for grantees 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).[7] Once the approach for comparing eHIP to GusNIP is finalized and the 12 most suitable grantees (based on the selection criteria) are selected, the study team will ask these 12 GusNIP grantees to give permission for NIFA and NTAE to share data

[7] 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.

reports that the grantees had previously compiled and provided to NIFA and NTAE (appendix P); NIFA and NTAE can submit these reports to the study team via secure portal. GusNIP grantees will also be offered the same secure data transfer protocols as described for the administrative project cost data collection if the grantees prefer to submit the reports directly to the study team. The study team will review data as it is received. If additional follow-up is needed with grantees after receiving their administration data, the study team will send identified grantee staff an electronic letter requesting to schedule an interview (appendix I). After this, the study team will send grantee staff additional electronic letters with a reminder to schedule an interview (appendix J) and a reminder about their scheduled interview (appendix K). Prior to the interview, the team will send grantee staff members the interview consent form (appendix N) and after the interview they will send a follow-up and thank you note (appendix O).

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

This study will comply with the E-Government Act of 2002 (Public Law 107–347, 44 U.S.C. Ch 36). All data collection will be 100% electronic and is designed to minimize burden.

Administrative project cost data collection. State agencies, retailers, EBT processors, and TPPs will submit cost data through a secure online file transfer protocol, which will prevent any unauthorized access to the information contained in the data submissions.

Interview data collection. The study team will hold all essential staff interviews by either teleconference or videoconference according to the preference of the interviewees.

Extant national and State data. The study team will collect publicly available extant data on relevant State and national characteristics via publicly accessible web file downloads.

Administrative GusNIP grantee data collection. Like the State entities for the administrative project cost data collection, NIFA, NTAE, and/or the GusNIP grantees themselves will submit cost data through a secure file transfer protocol, which will prevent any unauthorized access to the information contained in the data submissions.

Overall, these electronic data collection methods will reduce burden by enabling respondents to easily schedule their efforts for this study around their other responsibilities and easily submit requested data via web upload.

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

There is no similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA grant reporting requirements, and none include the information to be collected in this study. FNS solely administers and monitors eHIP implementation. The study team pretested all study data collection instruments to reduce duplication and burden (see appendices V-W). The team also will customize the interview guides for each respondent based on the data received that needs to be reviewed with the respondent to minimize duplication and burden.

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

Information being requested or required has been held to the minimum required for the intended use. The study team is collecting data from large state government entities: three SNAP State agencies. While the study team does not yet know whether any TPPs and/or retailers potentially participating in the data collection would be small entities, the team has minimized potential burden by developing data templates for the administrative project cost data collection in consultation with FNS and the project States that account for each entity's responsibilities to ensure the requested data are within each entity's reporting capabilities, and assign the primary responsibility of consolidating data for the data collection templates to the SNAP State agencies. The study team will work directly with participating entities to clarify questions and resolve missing data with this administrative data collection. The study team is collecting the project data in three discrete rounds, which should be less disruptive to these entities' operations than requesting data more frequently. All data will be submitted via secure web file upload, which should further reduce burden.

For the interview data collection, all interviews will be conducted based on the interviewees' schedules and by their choice of teleconference or videoconference. 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.

For the administrative GusNIP grantee data collection, the study team will reduce burden by suggesting to grantees (if they prefer) to authorize NIFA and NTAE to release these data directly to the study team. However, if grantees prefer to directly provide the study team with their data, the study team will only be requesting data that has already been compiled and provided to NIFA and NTAE. The study team will provide a secure web file upload protocol to minimize grantees' burden in participating.

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

The data collection for the proposed study is voluntary and is a one-time data collection that will be conducted over a single (approximately) 15-month period, with multiple discrete instances of data collection within that period. If the data collection is conducted less frequently, then there will be risks that the data collected will be incomplete or insufficient to fully meet the study objectives. Without this data collection effort, FNS will not know the actual cost of administering eHIP programs, the estimated costs of nationwide expansion of eHIP, and the costs and return on investment of eHIP programs versus other incentive programs. This information will help FNS evaluate both the extent to which eHIP programs are being administered effectively and efficiently by participating State agencies and the economic impact of eHIP programs. Study results will also help FNS (a) consider the feasibility and worthiness of expanding eHIP programs nationwide and (b) provide guidance to other States considering implementing their own eHIP programs.

A7. Special Circumstances Relating to the Guideline of 5 CFR § 1320.5

Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause USDA FNS to conduct this information collection in a manner inconsistent with 5 CFR 1320.5.

A8. Comments to the Federal Register notice and efforts for consultation: If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

The agency's 60-Day Federal Register Notice (FRN) was published April 4, 2024 (89 FR 23545-23550). FNS did not receive any comments for the 60-Day FRN.

After the data collection instruments were developed, the study team also pretested the administrative cost instrument with staff from each eHIP project State (Table A8.1). During each pretest, each State provided input about administrative data content, including what data elements the State would be able to provide and how to identify each element requested (see appendix V for the pretest protocol). This pretest feedback was then used to refine and finalize the data collection instruments (see appendix W for the Pretest Methods and Summary of Findings).

Table A8.1. Instrument Pretest Respondents

Name	Title and Organization
De'Angela C.	eHIP coordinator, Department of Children & Family Services, Louisiana
Emma K.	EBT and Incentives Project Administrator, Department of Human Services, Colorado
Alex H.	Electronic Health Incentives Program Coordinator, Department of Health, Washington State

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

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

No payment or gift will be provided to respondents.

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

In accordance with the Privacy Act of 1974, the study team will protect the privacy of all information collected for the study and will use it for research purposes only. No information that identifies any study participant will be collected; only aggregate participant data will be collected. FNS Privacy Officer, Deea Coleman, reviewed on [July 8, 2024] this information collection request and determined that the collection is not subject to the requirements of the Privacy Act. The identities of participating SNAP State agency, EBT processor, TPP, retailer, and GusNIP grantee staff will not be disclosed.

SNAP State agencies, EBT processors, TPPs, retailers, NIFA and NTAE staff, and GusNIP grantees asked to submit administrative data will do so using a secure file transfer protocol, which prevents any unauthorized access to the information contained in the data submissions. All members of the study team with access to the data will be trained on the importance of privacy and data security. All data will be kept in secured locations.

The contractor’s systems do not tie into any of FNS’s data management and analysis systems. The contractor’s data creation and processing system was not created for this contract agreement. FNS does not have any control over the contractor’s systems. However, the study team will submit data files to FNS including administrative project cost data, deidentified interview transcripts, extant data and documents analyzed, administrative GusNIP grantee data, statistical software code, and associated documentation used to produce the final report. Audio recordings from the interviews will not be provided because it is not feasible to remove identifying information. Per the institutional review board approval for the study (appendix S), FNS’s contractor will destroy its copies of all study data 36 months after the study ends.

The following safeguards will be employed by FNS’s contractor to protect privacy during the study:

- Computer data files will be protected with passwords, and access will be limited to specific users on the research team.
- Interview recordings will not be shared with anyone.

- 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 above safeguards appears in appendix T.

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

This information collection includes no questions of a sensitive nature. The FNS Privacy Officer, Deea Coleman, reviewed this information collection request on [July 8, 2024] and determined that the collection is not subject to the requirements of the Privacy Act.

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

12A. 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.

This new information collection has a total of 50 respondents, 362 responses, and 198 burden hours. The burden estimate assumes a 100 percent response rate; this is consistent with recent administrative data collections from State agencies that administer nutrition assistance programs. The affected public in this study can be summarized as 12 individuals from State government and 38 individuals from business (for- and not-for-profit). This includes 12 State SNAP agency staff, 2 staff members from the two EBT processors working with the three eHIP project States, 18 retailer staff, 6 TPP staff, and 12 GusNIP grantee staff for a total sample size of 50 individuals.

The annual total estimated burden (hours) across all data collection components is 198 hours. Time per response ranges from 5 minutes for reading reminder emails to 7 hours for completing administrative project cost data collection. Time per response was estimated based on the experience and expertise of the study team's SNAP EBT experts and their experience with previous similar administrative data collections. 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.

See table A12.1 and appendix U for more detailed information concerning the burden and annualized costs to respondents for this collection.

Table A12.1. Burden Summary for Respondents

Affected Public	Estimated Number of Respondents	Number of Responses per Respondent[a]	Total Annual Responses	Estimated Hours per Response[b]	Estimated Total Burden (Hours)
State Government (includes SNAP State agency staff)	12	7.5	90	1.0	92.8
Businesses (includes EBT processor, retailer, TPP, and GusNIP staff)	38	7.2	272	0.4	105.7
Total respondent burden estimate	50	7.2	362	0.5	198.5

[a] Number of responses per respondent = total annual responses/total number of respondents

[b] Estimated hours per response = total burden/total annual responses

12B. Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. The total annualized cost to respondents for the hour burdens for collections of information is $14,219 ($5,142 for SNAP State agencies and $9,076 for businesses). This total annualized cost is calculated as the sum of the annualized costs by respondent category and includes a 33 percent fringe benefit amount. For each respondent category, the annualized cost is the product of burden hours (including pretest burden) and an assumed wage rate for a corresponding occupation.

The study team determined wage rates using the 2023 national occupational employment and wage data from the Department of Labor's Bureau of Labor Statistics. Table A12.2 shows the wage assumptions.

Table A12.2. Wage Assumptions

Respondent Group	Job Category	Code	Code Description	Industry	Wage ($)	Fully Loaded Wage ($)
SNAP State agency staff	Management Occupations	11-9151	Social and Community Service Managers	State Government, excluding schools and hospitals	41.68	55.43
EBT processor and TPP staff	Management Occupations	11-3021	Computer and Information Systems Managers	Cross-industry	86.88	115.55
Retailer staff	Management Occupations	11-1021	General and Operations Managers	Cross-industry	62.18	82.70
GusNIP grantee staff	Management Occupations	11-9151	Social and Community Service Managers	Cross-industry	40.10	53.33

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

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

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

The total cost to the Federal government is $982,846 over a 48-month period, or $245,712 annually. Contractor costs associated with all aspects of this study, including developing recruitment materials and data collection instruments, establishing potential DUAs, collecting data, conducting analysis, preparing reports and data files, and fringe benefits, total $920,698 over 48 months, an estimated $230,175 annual cost to the Federal government. The annual cost also includes 200 hours per year of Federal employee time, plus a 33 percent fringe benefit amount, for a Social Science Policy Analyst with a GS-13, step 2 salary level in the Washington, DC, locality at $77.69 per hour ($58.41 per hour without the fringe benefit amount) for a total of $15,537 per year. The total cost for the Federal employee is $62,148 over the 48-month period. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2024.

A15. Explanation of program changes or adjustments: Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This submission is a new information collection request and will add 198 hours of burden and 362 annual responses to OMB's inventory.

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

Table A16.1 shows the schedule for data collection, tabulation, and publication.

Table A16.1. Study Schedule

Activity	Timeframe
Develop and Test Data Collection Instruments	January 2024—May 2024
Data Collection	15-month period beginning immediately after OMB approval
Data Analysis and Prepare Exhibits	On a rolling basis upon completion of a set of analyses either by eHIP project or by phase (pre-implementation and implementation periods)
Draft and Final Reports for FNS With Data Files and Documentation	July 2026—July 2027
Briefing for FNS	June 2027

Quantitative data collection (includes data from administrative project cost data collection, extant national and State data, and administrative GusNIP grantee data collection). Upon completion of the data collection period, the study team will consolidate information from the various sources, including the eHIP project cost data and existing data sources and create a file for analysis using statistical software such as SAS or R. The initial step in the data cleaning process will involve adding a variable to the dataset that identifies any discrepancies. The study team will carefully document all modified values and provide the reasoning behind each decision. The team will also generate and review frequency distributions, particularly for the incentive issuance data. This effort will help ensure that the values for each variable fall within expected parameters and meet predetermined thresholds for completeness. All corrections, revisions, and additions will be thoroughly documented. To gain further insight into distributions, the team will use descriptive analyses such as means, percentages, and cross-tabulations. Using this analytic file, the study team will produce detailed tables and figures to be included in the final report. These tables and figures will address the study objectives. Responses to any open-ended questions will be uploaded into NVivo and coded along with the interview data collection.

Interview data collection. Interview data will include both factual data clarifying received cost data and open-ended responses to questions about lessons learned. The former will be incorporated into cost analyses for study objective 1. The latter will be analyzed independently to contextualize study objective 1 cost analyses as well as provide insight into current cost assessments and possible nationwide expansion of eHIP. The study team will qualitatively analyze interview data on lessons learned and recommendations from project States about how eHIP can be implemented effectively and efficiently. The team will develop a coding scheme that aligns with the study objectives and research questions. The study team will then use this coding scheme to code all interview transcripts in NVivo. Qualitative data analysis will be an iterative process, with multiple rounds of testing and discussion to refine the coding scheme. The study team will use the analyses completed to produce detailed tables and figures to be included in the final report, which will address the study objectives.

Reporting

Results will be presented in a final report to be made public on the USDA FNS website:

https://www.fns.usda.gov/research-analysis.

A17. Displaying the expiration date for OMB approval: 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.

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

There are no exceptions to the certification statement.