

J. National Agricultural Statistics Service Comments and Response

NASS Comments

Study Objectives: These objectives seem reasonable given the survey instrument.

Background

Per the Food and Nutrition Act of 2008, and as amended in 2014, the U.S. Department of Agriculture's (USDA's) Food and Nutrition Service (FNS) administers the Supplemental Nutrition Assistance Program (SNAP). Per a congressional amendment, participants have a work requirement to be eligible to participate in SNAP, with some exceptions.

SNAP State agencies operate an employment and training (E&T) program to help SNAP participants. Of note, there is some flexibility in terms of implementing the rules concerning who is required to participate in the E&T program. In order to evaluate equity, USDA FNS has contracted with Westat to perform a study to assess and monitor the equity of administration in the SNAP E&T programs. All SNAP State agencies are included in this study.

Data Collection Instruments/Study

The study includes a survey of all 53 SNAP State agencies, document review, and key informant interviews with individuals from six States. This Information Collection Request includes five data collection instruments: (1) Survey Instrument (attachments C.1 and C.2); (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) [Part A OMB].

Comments/Suggestions

Overall, this seems like a very interesting study to evaluate the equity of E&T programs. However, I do have a few issues I delineate below that I'm fearful could introduce some bias in the output. In particular, a non-response strategy to the web-based survey so that non-response is adequately accounted for is important.

1. **Part B.1. Web-based survey:** How will nonresponse be handled? Will there be any nonresponse? Is this a "required" survey? Per the questionnaire's Public Burden Statement, it is a "voluntary" data collection. If nonresponse is expected, how it will be addressed should be discussed so as to help mitigate any potential bias in results.
2. **Part B.1. Key informant interviews:** One should consider laying out a sampling strategy here that properly stratifies the respondents so their output can adequately represent the population.
3. **Part B.1.** How was the sample size for this determined?
4. **Table B.1.1.** [The table for] Respondents and Nonrespondents is confusing due to the goal of presenting "unique" responders as the total. Consider breaking out the numbers as a Total and a Total Unique. For example, if there are 10 SNAP State Directors, but only 7 are unique given they have responded elsewhere, consider putting 10 (7). Currently the table does not add up, and the

calculated response rate for SNAP State Director does not necessarily make sense given the number of non-responders.

5. **Section B.2.** While there is no sample defined, it may still be useful to discuss estimation strategies (presumably descriptive statistics and simple aggregation) that will be presented in the final report.
6. **Section B.2. Web-based survey:** The follow-up plan seems adequate. However, how will any non-response that remains at the end be addressed?
7. **Survey instrument, questionnaire.** The questionnaire contains 88 questions, and the allotted time [to complete] is 75 minutes. A majority of the questions can probably be answered from respondents’ memory, but some may require extra work to confirm or validate. For example, someone may have to spend time looking at the SNAP eligibility system to validate the answer to question 55 and others in that section. Consider reevaluating the burden, as it’s possible the respondents can complete this in 75 minutes, but without in-depth knowledge I cannot confirm. (I will note that Document K, Section C, does indicate it could take more than 2 hours to complete.)
8. The web-based questionnaire has a good flow to it. Is question 39 open-ended? Or will there be options for “type of service”?
9. I perused the attachments, and they all seemed appropriate.

FNS Response

#	Location in Supporting Statement	NASS Comment	Response
1	Part B.1. Web-based survey	How will non-response be handled? Will there be any non-response? Is this a “required” survey? Per the questionnaire’s Public Burden Statement it is a “voluntary” data collection. If non-response is expected, how it will be addressed should be discussed so as to help mitigate any potential bias in results.	<p>For States that do not respond to the study’s email requests for participation, trained data collectors will follow up by phone to encourage, as indicated on page 10. This is a process we have used successfully with recent studies that included a census of State agencies. One recent example, the WIC Breastfeeding Practices Inventory, resulted in an 85% response rate among State agencies. Because the surveys are not intended to generate inferential data representative of a larger population, bias resulting from nonresponse will not affect the study’s findings.</p> <p>In response to this comment, we included a sentence on page 10 indicating that because the surveys are not designed to provide results representative of a larger population, non-response will not affect the study’s ability to address primary research objectives.</p>

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2	Part B.1	Key Informant Interviews – One should consider laying out a sampling strategy here that properly stratifies the respondents so their output can adequately represent the population.	In response to this comment, we added additional language on page 2 to clarify that the key informant interviews are designed to provide in-depth information, rather than representative information, of persons with knowledge and experience directly relevant to the study objectives. We added table B.1.1. on page 3 which describes our key informant interview State selection criteria in more detail.
3	Part B.1	How was the sample size for this survey determined?	The web survey is a census of all State SNAP agencies, as noted on page 7. On the key informant interviews, we added additional information about how FNS determines the sample sizes for studies (page 2).
4	Table B.1.1	Respondents and Nonrespondents table is confusing due to the goal of presenting “unique” responders as the total. Consider breaking out the numbers as a Total and a Total Unique. For example, if there are 10 SNAP State Directors, but only 7 are unique given they have responded elsewhere, consider putting 10 (7). Currently the table does not add, and the calculated response rate for SNAP State Director does not necessarily make sense given the number of non-responders.	We have made the recommended changes to Table B.1.2 on page 6. We added a new table that became B.1.1., the table referenced here is now B.1.2.
5	Section B.2	While there is no sample defined, it may still be useful to discuss estimation strategies (presumably descriptive statistics and simple aggregation) that will be presented in the final report.	We have added text to Section B.2 on page 8 that describes our approach to presenting statistical information.
6	Section B.2. Web-based Survey	The follow-up plan seems adequate. However, how will any nonresponse that remains at the end be addressed?	In response to this comment, we included a sentence on page 10 indicating that because the surveys are not designed to provide results representative of a larger population, non-response will not affect the study’s ability to address primary research objectives.
7	Survey Instrument, Questionnaire	The questionnaire contains 88 questions, and the allotted time is 75 minutes. A majority of the questions can probably be	As noted in the pretest memorandum (Attachment K), pretest participants’ estimates of the time needed to complete the survey ranged from 40 to 60 minutes

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		<p>answered from respondents' memory, but some may require extra work to confirm or validate. For example, one may have to spend time looking at the SNAP eligibility system to validate the answer to question 55 and others in that section. Consider re-evaluating the burden, as it's possible the respondents can complete this in 75 minutes, but without in-depth knowledge I cannot confirm. (I will note that Document K, Section C, does indicate it could take more than 2 hours to complete.)</p>	<p>to 90 to 120 minutes. Based on this range, we anticipate 75 minutes to be a reasonable average time, across all participants, to complete the survey.</p> <p>We did not make any changes in response to this comment because 75 minutes is an average time, where some respondents might take longer and others less time based on our pre-test results.</p>
8	Survey Instrument, Questionnaire	The web-based questionnaire has a good flow to it. Is question 39 open-ended? Or will there be options for "type of service"?	In response to this comment, we updated the structure of question 39 to allow for a yes or no answer to each item listed.