

Sent via electronic mail

Michael Burke
Office of Policy Support
FNS, USDA
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Re: Evaluation of Child Support Cooperation Requirements in SNAP

Dear Mr. Burke:

On behalf of the Child Support Directors Association of California (CSDA), the Program Policies and Regulations Committee, in cooperation with the Legal Practices Committee, has drafted the following comments regarding the Agency Information Collection Activities: Proposed Collection; Evaluation of Child Support Cooperation Requirements in the Supplemental Nutrition Assistance Program (SNAP). Please contact Greg Wilson, Executive Director, at (916) 464-6700 or gwilson@csdaca.org if there are any questions or additional information is requested. The comments will be presented in the four sections as outlined in the Supplementary Information section of the notice.

A. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility

CSDA supports the gathering of data and information to assist the Food and Nutrition Service (FNS), USDA with making informed decisions. Such information can promote greater access and/or ease of access to services and benefits. The information collected could inform future decisions and development of program services, such as universal benefits applications. Gathering this data will also assist in evaluating the overarching question of whether or not a child support cooperation requirement is appropriate with SNAP recipients.

B. The accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions that were used

CSDA notes the estimates for time and manner of how visits would be conducted, as highlighted in the Notice, may require modification in light of current COVID-19 limitations. Was the estimate of the burden of the proposed collection of information assuming a traditional in-person interview or will telephone and/or virtual interviews be substituted?

Data gathering and the burden of such activities may vary from jurisdiction to jurisdiction. Ensuring consistency in the definition of data elements between agencies will be critical for data collection and later comparison, even between the same program offices in different locations. If they are not on a statewide system or on a system that does not provide sufficient data metrics,

consistency of data elements will be key. CSDA recommends that any manual data collection that is necessary is also done in a consistent manner.

In addition to data gathering logistics questions, CSDA also questions the scope of the site visits. As the Notice indicates, the site visits will include interviews with State staff designated by the State Director from the SNAP and child support agencies. These interviews will include visits to two (2) local SNAP and two (2) local child support agency offices as well as interviews with staff. This narrow of a scope may limit data obtained and therefore be insufficient for meaningful evaluation. CSDA recommends increasing the number of offices and local staff interviewed, providing a broader, more statewide collection of responses.

The Notice also provides a matrix estimating response rates and estimates of time. The initial sample size for customer contacts is 750 participants. CSDA notes, the assumption that 40% or 300 will respond may be difficult to achieve. CSDA would recommend increase the sample size to allow for a more realistic 20-25% response rate while still achieving 300 responses. This would increase the sample size up to 1,200. The matrix also assumes 100% response rate from all state and local government respondents. CSDA would recommend building in a follow up or other mechanism to ensure their 100% compliance with this effort. Time estimates for any follow up to garner responses should be estimated in the matrix.

The methodology as described in the Notice includes interviewing participants through e-mail, phone call, and in person interviews. Each of these methods of data collection can create inconsistency. CSDA would recommend using electronic surveys or scripted questions to ensure each participant is asked the same questions to maximize validity of data gathered.

C. Ways to enhance the quality, utility, and clarity of the information to be collected

As noted in the prior section, CSDA would recommend utilization of carefully crafted surveys to create consistency and uniformity of responses. In addition, for telephone interviews, using a script for questions as well as prepared answers to respond to potential questions from respondents will create further consistency in data collection.

Though details of specific questions were not included in the Notice, CSDA would suggest including questions that address the ease of access to benefits and services for parents/caretakers and how the child support requirement affected that.

To enhance the quality of responses, CSDA would recommend initiating contact with respondents using a variety of tools, such as postcards/mailings, outgoing mail inserts, IVR announcements, informational flyers available for walk-in clients, phone/text messaging and e-mail with multiple cycles to maximize responses.

The Notice indicates the administrative data will come from SNAP and child support agencies. Part of the analysis will be evaluating the impact of the child support requirement on SNAP participants. The information gathered from SNAP and child support agencies is only specific to those two programs. CSDA would recommend gathering additional socio-economic and community data factors that may affect outcomes. This will provide a foundation for comparison

between respective locations. Such factors could include population poverty rates, percentage of single-parent households, aided versus non-aided ratios, and other demographic factors.

A comparison of local programs may also assist in evaluating ease of access. If one location is fully automated with a variety of convenient web-based tools for parents/caretakers to quickly access their services while another is more traditional, this can affect outcomes.

D. Ways to minimize the burden of collection of information on those who are to respond, including use of appropriate automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

CSDA would recommend written electronic surveys, similar to SurveyMonkey, to ensure economy and efficiency for those taking the surveys and that all the questions are identical. For validation purposes, each survey could require certain identifying information, such as an e-mail or telephone number, to minimize duplication.

In lieu of in-person site visits and interviews of State and local staff in both programs, a recommendation would be to offer virtual interviews. This may also increase the response rate for respondents based upon its convenience.

In regards to administrative data provided by the two programs. CSDA would recommend querying the systems first and then evaluating results. This requires the least amount of impact to the respondent and may provide sufficient information. Verifying and validating the data elements between systems will be critical when interpreting the data. Definitions of data elements between programs and local offices can vary so understanding how service delivery agencies enter and interpret their own system data will be essential.

CSDA appreciates the opportunity to provide public comment and is available to respond to any questions you may have.

Sincerely,



Greg Wilson, CAE
Executive Director