

PAPERWORK REDUCTION ACT SUBMISSION - OMB SUBMISSION

FOOD AND NUTRITION SERVICE

PENNSYLVANIA RURAL AREA ELIGIBILITY PILOT

OMB NO. 0584-NEW

SUPPORTING STATEMENT

Part A - Justifications

- 1. 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.**

The Food and Nutrition Service (FNS) is requesting clearance to implement the data collection phase for the evaluation of the Pennsylvania Rural Area Eligibility Pilot. The Pennsylvania Rural Area Eligibility Pilot is a pilot of the Summer Food Service Program (SFSP). SFSP was created by Congress in 1968 as the Special Food Service Program for Children. In 1975, a separate Child Care Food Program and a Summer Food Service Program were authorized. SFSP was authorized to provide free and reduced price meals to children in residential Summer camps and sites serving areas of poor economic conditions, where at least one-third of the children qualify and are eligible to participate.

The Summer Food Service Program: SFSP is an entitlement program established to allocate funding to sponsoring organizations to serve nutritious meals to low-income children in rural and urban sites during Summer time, to ensure that they continue to receive nutritious meals when school is not in session. Free meals that meet Federal nutrition guidelines are provided to all children at approved SFSP sites in areas with significant concentrations of low-income children. In essence, SFSP provides meals to children who would normally receive free or reduced price meals when school is in session. It helps children to maintain a nutritious diet and their families to stretch their food dollars during the summer months. The program is offered in many and various locations such as parks, playgrounds, housing authorities, day camps, churches, community centers, etc. It is provided to children who might otherwise go hungry, often in conjunction with educational, developmental, and recreational activities. With more parents working outside the home, organizations are serving school-age children after school as well as in summer.

The Pennsylvania Rural Area Eligibility Pilot: To address the concern that some poor rural children may not be reached by the SFSP, Public Law 108-265 established a pilot for the SFSP in rural areas of Pennsylvania for Calendar Years 2005 and 2006. The original program provided free meals to sites in areas where 50 percent of children were living in households with incomes at or below 185 percent of the poverty line. The new criterion in the Pilot relaxed the requirements to include sites in areas where 40 percent of households were at or below 185

percent of poverty. In establishing this Pilot, in effect Congress expanded the eligibility criterion for participation in the program in rural Pennsylvania.

The Pilot Evaluation: The Child Nutrition Division (CND) of the Food and Nutrition Service (FNS), on behalf of the Secretary of Agriculture, is authorized by Public Law 108-265 (through Section 116 of the Child Nutrition and WIC Reauthorization Act of 2004), to establish a demonstration pilot of the SFSP in the rural areas of Pennsylvania only (as determined by the Secretary) for each of the calendar years 2005 and 2006, using a lower threshold of 40 percent (instead of 50 percent) for determining eligibility in areas in which poor economic conditions exist. The State of Pennsylvania is authorized by this legislation to use school data or census data, when appropriate, to determine eligibility of feeding sites.

P.L. 108-265 further requires the Secretary, through FNS, to evaluate the impact of the 40 percent eligibility criterion as compared to the 50 percent criterion. The legislation specifies that the primary goal of the evaluation is to determine the impact of the change in the threshold on the number of children, meals, sites serving meals, sponsors administering the sites, the geographic location of sites, and other issues. A report is due to Congress by January 1, 2008.

This submission involves three separate surveys designed to answer the evaluation questions:

- Sponsor Survey – Sponsors are organizations that work directly with the Pennsylvania State Department of Education to operate the feeding sites.
- Site Survey – Sites are the physical locations at which food is actually provided to children. Sites are overseen by sponsors, and the sponsor’s representative at the site will be interviewed.
- Site Monitor Survey – Site monitors are state employees who track sites’ compliance with various regulations.

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

The information collected from this evaluation will be used by managers and administrators of the USDA, in particular the Child Nutrition Program of FNS and the Pennsylvania Department of Education Food and Nutrition Division, for the purpose of planning, organizing, and delivering SFSP services. The Secretary of USDA is required to provide a report to Congress no later than January 1, 2008 on the impacts of the eligibility change. Based on the legislation, the evaluation shall assess the impact of the change in threshold on:

- a. The number of sponsors offering meals through SFSP;
- b. The number of sites offering meals through SFSP;
- c. The geographic location of the sites;
- d. Services provided to eligible children; and
- e. Other factors determined by the Secretary.

The questions in each survey are designed to address these legally mandated issues from the perspectives of the three key respondent groups of sponsors, site supervisors, and monitors.

- 3. Describe whether, and to what extent, the collection of information involves 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.**

The primary means by which information will be collected is through an Internet survey. Based on conversations with sponsors and administrators during a set of 8 visits, it is expected that 100 percent of sponsors, 100 percent of site monitors, and up to 75 percent of sites will be able to access this survey online.

Although attempts will be made to survey all sites electronically, some of the sites are located at playgrounds that do not have electricity, much less Internet connectivity. While some site sponsors may be able and willing to complete the survey online after hours, sponsors visited during the 2005 sponsor visits and staff of the Pennsylvania State Department of Education have intimated that some of the sites may not complete the surveys online. The backup strategy is a paper survey, which will be transmitted to site directors by sponsor directors and then mailed back in a self-addressed return envelope with paid postage.

- 4. 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 item 2 above.**

The Pennsylvania Department of Education operates a database, called PEARS, on which it tracks extensive information regarding the operation of various food programs for children, including SFSP. The project will make extensive use of the PEARS database. However PEARS, as an administrative database, does not contain all the information needed for the study. The three surveys have been designed to obtain information not contained in the database.

In one or two cases, such as the exact location of a site, the survey asks respondents to verify if the address obtained from the database is the location where food is served, or if it is simply used for administrative purposes. This must be done because the study calls for geographic analysis of the serving locations.

- 5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

Some, though not all, of the sponsors may be small businesses. We will not know prior to the collection which are small and which, large businesses. The goal of the survey is to minimize burden on all respondents. This will be done by: (1) using PEARS data whenever available, (2) intensively pilot-testing questionnaires to make them as easy to use and clear to understand as possible, and (3) administering as many questionnaires as possible via the Internet. The latter incorporates such features as automatic skip patterns, which limit respondent questions to only those, which are relevant for their organization. The mail survey will also be designed to let respondents move quickly to the appropriate sections of the survey.

6. Describe the consequences 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 in reducing burden.

The legal consequence for collecting this information less frequently, or not collecting it at all would be to violate Public Law 108-265, which mandates that USDA collect this information and report back to Congress no later than January 8, 2008. The policy and programmatic consequences would be that USDA agencies will have no information to determine if the pilot eligibility threshold had any positive or deleterious impact, whether it results in more effective SFSP service delivery to children, or whether it is more efficient in terms of cost savings to government in comparison to the existing threshold. These surveys will be most accurate and easiest to conduct if they are completed during the summer of 2006 SFSP season. A delay in receiving OMB approval will result in our having to conduct the surveys when sites would have closed shop and staff dispersed.

7. Explain any special circumstances that would cause any 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 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 secrets, 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.**

The only special circumstance that applies to this survey is the second bullet: *“requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it.”* The operation of the SFSP is limited, by definition, to the Summer months, and often varies in some areas. In addition, Congress requires a report by January 1, 2008. These two conditions have determined the schedule of deliverables for the project. Because of these limitations, survey recipients would need to respond within 30 days to ensure time for analysis and report writing.

- 8. 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.**

A notice was submitted by FNS to the Federal Register soliciting comments on the information collection. It was advertised on pages 27667-27668 of the Federal Register, Volume 71, Number 92, Friday, May 12, 2006, and scheduled to run for 60 days until July 11, 2006. At the end of the notification period, no comment was received.

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.

We have taken and are taking steps to consult with people outside USDA-FNS. These steps have included the following:

- 1) Extensive conversation with staff of Pennsylvania Department of Education - the state agency that administers the SFSP and the SFSP rural pilot.

- 2) Visits to eight sponsors scattered around the state. These sponsors were located in Erie, Kittanning, Delmont, Somerset, Marion Center, Morrisdale, Milton, and Swiftwater.
- 3) We plan to thoroughly pretest the survey instruments.

Consultation with representatives of those from whom information is to be obtained or 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 periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

This survey will be conducted only once among sponsors, site supervisors, and site monitors of the SFSP in Pennsylvania. So far, based on all the discussions and consultations held with staff of Pennsylvania State Department of Education, F.N.S., and the few sites we visited, only positive comments and input have been received. **No negative comments have been received.**

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

We will not be providing any payments or gifts to respondents of this survey.

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

Every effort will be made to maintain the privacy and/or confidentiality of respondents. Individual identifying information will be maintained separately from completed data collection forms and from computerized data files used for analysis. No respondent identifiers will be entered in public use files made available from the study. No data will be released in a form that identifies individual respondents.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers these 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.

The surveys will not ask any questions of a sensitive or private nature. No such questions are necessary. Respondents are assured that their answers are

confidential and no data will be released in any form that will be traceable to individual respondents.

12. Provide estimates of the hour burden of the collection of information. The statement should:

Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.

The total number of survey respondents is projected at 437, including 78 sponsors, 332 sites, and 27 monitors. Participants will only respond once, and the annual time burden for all respondents is 77.6 hours (see Table 1). Extensive skip patterns will be used in the surveys so respondents will only respond to questions relevant to their experiences, and primarily close-ended questions - both of which minimize burden.

A survey completion rate of 70 percent is estimated, which brings the net estimate of completed responses to 306. The sponsor survey is expected to take 20 minutes to complete, the site survey 15 minutes, and the site monitor survey 4 minutes. The overall person/hours for the three surveys are therefore estimated at 77.6 hours. The breakdown of these numbers by category and survey is provided in Table 1.

Table 1 - Survey Respondent Burden

	Survey Recipients	Projected Response Rate	Respondents	Time to Complete Survey	Person/Hours
Sponsor survey	78	70%	55	20 minutes	18.2 hours
Site Survey	332	70%	232	15 minutes	58.1 hours
Monitor Survey	27	70%	19	4 minutes	1.3 hours
Totals	437	70%	306		77.6 hours

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.

The respondents of the three surveys, sponsors, site supervisors, and site monitors are non-Federal agencies. To estimate the response rate, completion rates from prior experience conducting similar surveys were applied. To estimate the time required to complete each survey, the surveys were pilot-tested among staff of the contractor. Most of the information asked for in these surveys should be at respondent's disposal.

Time needed to look for information to complete the surveys is minimal, estimated at about 1 minute each for sponsors, sites, and monitors. These estimates are based on prior experience conducting in-person interviews with sponsor staff. Most respondents will not need to spend any time to look up information, so we include a minimal estimated average for those who might look up information. These time estimates are incorporated in Table 1.

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage and rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.

To estimate the cost to sponsor survey recipients, the Bureau of Labor Statistics' (BLS) November 2004 publication "State Occupational Employment and Wage Estimates" was consulted. Sponsor survey recipients will consist primarily of a combination of school district administrators and social/community service managers. Since the actual breakdown of sponsors is not currently known, a 50/50 balance is assumed between the two types. From the BLS estimates, the average hourly wage for an education administrator at the elementary or secondary level in Pennsylvania was \$37.59. The average hourly wage for a social/community service manager at that time was \$25.25. Given the assumption of a 50/50 division between these two types of people, it is estimated that the average hourly wage of the people we will be surveying is \$31.42. The total one-time cost to respondents of the sponsor survey is \$571.84.

The hourly wage of those completing the site surveys is more difficult to estimate. From sponsor visits conducted in December 2005, it was discovered that many of the site supervisors that we survey are likely to be volunteers. In other cases, they are likely to be relatively low-wage workers. As such, we are estimating the average hourly wage for those completing the site surveys to be \$8/hr. The total one time cost to respondents of the site supervisor survey is \$464.80.

The 13 site monitors are all temporary state employees. Figures on their wages are not available. However, they are mostly current college students, working during their summer break. Their hourly wage is estimated at \$10. The total one time cost to respondents of the site monitor survey is \$13.

The total cost to all respondents of all surveys is \$1,049.64. Table 2 shows estimates of labor costs for completing all the surveys.

Table 2 - Survey Respondent Cost

	Hourly Wage	Hours to Complete	Total Labor Cost
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		Survey	
Sponsor Survey	\$31.42	18.2 hours	\$571.84
Site Survey	\$8.00	58.1 hours	\$464.80
Monitor Survey	\$10.00	1.3 hours	\$13.00
Totals		77.6 hours	\$1049.64

- 13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14.)**

The cost estimate 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. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collections services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.

Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There is no annual cost to respondents resulting from the collection of information other than the time to respond to the surveys, which are one-time costs provided in Item No. 12. The proposed information collection will not require the respondents to purchase equipment or services or establish new data retrieval mechanisms.

There will be no capital or start-up costs. Once the questionnaires have been filled out by respondents, the involvement of respondents in the data collection process

ends. Responding organizations will not need to purchase equipment or services in order to respond to this information collection effort.

- 14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this information collection. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.**

The planning of the evaluation involving staff time started in July 2005. The entire study is expected to last until December 31, 2007, culminating in a final report. This amounts to 6 months (26 weeks) in calendar year 2005, 12 months (52 weeks) in calendar year 2006, and 12 months (52 weeks) in calendar year 2007. The key Federal staff member responsible for supervising the study contractor is a Social Science Research Analyst (GS-13), who will spend, on average, 8 hours a week (0.20 FTE) on the project. Limited consultation is expected from the FNS Child Nutrition Division program staff at an average of 2 hours a week (0.05 FTE) from September 2005 through the study’s duration. The program staff’s time amounts to 4 months (17 weeks) in calendar year 2005, 12 months (52 weeks) in calendar year 2006, and 12 months (52 weeks) in calendar year 2007. For the two-and-a-half year duration of the study, the cost to the Federal Government is \$11,132 in CY 2005, \$23,920 in CY 2006, and \$23,920 in CY 2007, for a total cost of \$58,972. The annualized costs to the Federal Government throughout the duration of the study are shown on Table 3.

Table 3 - Survey Administration Cost

Activity/Position/ Staff Time	CY 2005			CY 2006			CY 2007			Total Cost
	Wks	Hrs	Cost	Wks	Hrs	Cost	Wks	Hrs	Cost	
Project Management										
Soc. Sc. Res. Anal. @ \$46/hr., 8hrs/wk	26	8	\$9,568	52	8	\$19,136	52	8	\$19,136	\$47,840
Staff Consultation										
CND Program Staff @ \$40/hr., 1hr/wk	17	2	\$1,564	52	2	\$4,784	52	2	\$4,784	\$11,132
Total Cost	43	10	\$11,132	104	10	\$23,920	104	10	\$23,920	\$58,972

- 15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.**

This is a new collection. As such, all of the costs itemized in Items 13 and 14 represent program changes. The reason for these changes is the passage of Public Law 108-265, which mandated that the USDA collect this information.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and end dates of the collection of information, completion of report, publication dates, and other actions.

Research for this project has already begun. Sponsor visits have been undertaken, and we have begun to acquire information from the Pennsylvania Department of Education’s database. Surveys are planned to be conducted between the last week of July and the first two weeks of August. The interim progress report of the first year of the evaluation was completed in March 2006. The first year report, for which the surveys are being conducted, is due to be completed in January, 2007. The final report for the evaluation project, which will incorporate the results of these surveys, and a pamphlet and journal article, will be completed during the 4th quarter of 2007. Table 4 shows the project schedule.

Table 4 – Survey Schedule

Description	Due Dates
Collect administrative data	11/4/2005-07/2006: Currently ongoing
Develop Data Collection Instruments	04/30/2006
Develop OMB Clearance Package	6/30/2006
Interim Progress Report (on 2005 pilot)	3/28/06
Survey data collection	Late July 2006 - Mid August 2006
First Year Report (on 2006 pilot)	1/22/07
Presentation on First Report	02/05/2007
Final (Second) Report - Draft	9/12/2007
Final Report (on both years of pilot)	11/02/07
Pamphlet & Journal Article	11/02/07
Presentation to FNS/USDA	12/03/07

Analytic methods will include frequencies and cross-tabulations of survey data, and regression and geographic analyses. An inter-temporal and cross-site regression model will be designed to separate impacts of the legislative change from other factors affecting the numbers of children, meals, sites created and sponsors participating in the SFSP. Geographic analysis will examine distances between sites and urban centers, population density in surrounding areas, and the distributions of sites and rural poverty. Most locational data will be acquired through the PEARS administrative database, but the survey will be used to obtain food distribution site

location, if it differs from an administrative address found in the administrative database.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

This approval is not being sought. Three survey questionnaires will be used for this information collection. We intend to display the OMB approval number and expiration date on the questionnaires. A statement identifying the public reporting burden associated with each questionnaire will be included on each survey instrument.

18. Explain each exception to the certification statement identified in Item 19, Certification for Paperwork Reduction Act Submissions, of OMB Form 83-I.

There will be no exception to the certification statement identified in Item 19 of Form 83-I.