

SUPPORTING STATEMENT FOR

Nutrition Assistance in Farmers markets: Understanding Current Operations

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PART A. JUSTIFICATION

A.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.

This is a new information collection for the study titled “**Nutrition Assistance in Farmers markets: Understanding Current Operations.**”

The study, planned for FY 2011-2012, affirms the Food, Nutrition and Consumer Services (FNCS) priority for expanding the farm-food connection in Food and Nutrition Service (FNS) programs.¹ The collection is authorized under paragraph 17(a)(1) of the Food and Nutrition Act of 2008 (7 U.S.C. 2026).

Background

The growing obesity crisis in the United States has created urgency among scientists and public health officials to develop and test sustainable programs that improve American diets. Fruit and vegetable intake has been shown to reduce the

¹FNCS Corporate Priorities FY 2010 Guide (April 2010). USDA Food, Nutrition, and Consumer Services. Available at: <http://www.fns.usda.gov/ora/menu/gpra/FY2010PrioritiesGuide.pdf>. Accessed on: 5/13/2011

long term risk of obesity² and other chronic diseases such as heart disease and cancer^{3,4,5} and serves as a marker for a healthy diet. However, two thirds of U.S. adults do not meet the USDA *Dietary Guidelines* for fruit and vegetable intake (Casagrande et al., 2007⁶). This shortfall is greatest for low-income Americans, such as participants in the Supplemental Nutrition Assistance Program (SNAP).^{7,8}

SNAP is intended to provide a nutrition safety net and reduce food insecurity by providing low-income Americans with access to food, a healthy diet and nutrition education. The Program, administered by the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS), provides eligible low-income households a monthly benefit amount (SNAP allotment) based on household size and net income to purchase foods from authorized retailers that can be prepared and eaten at home.

FNS is pursuing several initiatives to improve access to healthy foods among the general public and nutrition assistance program

2He, K., Hu, F.B., Colditz, G.A., Manson, J.E., Willett, W.C., and Liu, S. (2004). Changes in intake of fruits and vegetables in relation to risk of obesity and weight gain among middle-aged women. *Int J Obes Relat Metab Disord*, 28: 1569-1574.

3Eckel, R. (1998). Obesity and heart disease. A statement for healthcare professionals from the nutrition committee, American Heart Association. *Circulation*, 96: 3248-3250.

4Polednak, A.P. (2003). Trends in incidence rates for obesity-associated cancers in the U.S. *Cancer Detection and Prevention*, 27(6): 415-421.

5Calle, E.E., Rodriguez, C., Walker-Thurmond, K., and Thun, M.J. (2003). Overweight, obesity, and mortality from cancer in a prospectively studied cohort of U.S. adults. *New England Journal of Medicine*, 348(17): 1625-1638.

6Casagrande, S.S., Wang, Y., Anderson, C., and Gary, T.L. (2007). Have Americans increased their fruit and vegetable intake? The trends between 1988 and 2002. *Am J Prev Med*, 32: 257-264.

7 Formerly known as the Food Stamp program. In 2008 Congress renamed the program SNAP.

8Food and Nutrition Service (FNS). (2008, July). *Diet quality of Americans by food stamp participation status: Data from NHANES*.

participants (i.e., SNAP; Women, Infants, and Children (WIC), and seniors). Among these are steps to support the availability of farmers markets and direct access to farm products. FNS began working with farmers markets in the early 1990s to provide food assistance recipients access to fresh, unprepared, locally grown fruits and vegetables.

In 1992 Congress established the Farmers market Nutrition Program (FMNP) to provide WIC participants fresh, nutritious, unprepared, locally grown produce through farmers markets and to expand awareness and use of farmers markets. Participants are issued coupons in addition to their regular benefits to use to purchase the produce at approved farmers markets. Similarly, in 2004 FNS began a grant program for the Senior Farmers market Nutrition Program (SFMNP), designed to provide persons at least 60 years old with household incomes not greater than 185 percent of the federal poverty income guidelines with coupons they can redeem at approved farmers markets. Also in 2004, after the Opportunity Reconciliation Act of 2006 required all States to issue food stamp benefits via electronic benefit transfer (EBT), FNS began educating farmers markets on the use of EBT and providing free EBT point of sales terminals.

Farmers markets have the potential to improve access to fresh fruits and vegetables for low-income communities and can serve as an important tool to address health disparities. However, despite the exponential growth of farmers markets during the last decade, low-income

households have not fully participated in this upward trend⁹. According to the National Farmers Market Coalition, in 2009, fewer than 20 percent of farmers markets accept SNAP benefits.¹⁰ In 2009, American consumers overall spent about 0.2 percent of their food dollars at farmers markets.¹¹ In FY 2010 farmers markets grew 16 percent and SNAP redemption at farmers markets grew over 70 percent. However, despite this unprecedented growth, only 0.01 percent of all SNAP transactions were redeemed at farmers markets in 2010¹². FNS is committed to increasing the presence of farmers markets among SNAP authorized retailers. The goal of the proposed study is to increase FNS's understanding of the farmers market environment such that it can inform future policy in a manner that attracts a greater numbers of farmers markets and SNAP shoppers.

9Briggs, S., Fisher, A., Lott, M., Miller, S., and Tessman, N. (June, 2010). Real food, real choice: Connecting SNAP participants with farmers markets. Community Food Coalition/Farmers markets Coalition.

10 FMC and CFSC embark on Farmers Market SNAP Research Project. Available at: <http://farmersmarketcoalition.org/snap-research>. Accessed on 5/13/2011/

11USDA, Economic Research Service, 2009. Supplemental Nutrition Assistance Program (SNAP) at Farmers Markets: A How-To Handbook. Available online at:

<http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5085298>

12Food and Nutrition Service (FNS) Supplemental Nutrition Assistance Program (SNAP) Benefit Redemption Division (BRD) Annual Report for FY 2010. (2011). Available at:

<http://www.fns.usda.gov/snap/retailers/pdfs/2010-annual-report.pdf>. Accessed on May 11, 2011.

A.2. Indicate How, by Whom, How Frequently, 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 proposed study involves a national survey of Farmers Market (FM) managers and Direct Marketing (DM) farmers to understand their current operations and how those affect participation in USDA nutrition assistance programs. About 80% of FM managers and 2% of DM farmers are considered businesses for profit. Many of the DM farmers are small business owners. In addition to the national study, two related sub-studies include: examination of the undercoverage of farmers markets on the sampling frame, and exploration of the market operation characteristics that influence SNAP recipients' decisions to shop at a farmers market.

Study Objectives

National Survey of Nutrition Assistance and Farmers/Farmers Markets

The objectives of this national study are to:

1. Understand the characteristics of SNAP authorized and not SNAP authorized FMs and DM farmers.
2. For SNAP authorized markets and DM farmers, understand relationship of characteristics to the way the program works (e.g., system of redemption, volume of redemptions) in that setting.
3. Understand the connections to other markets, support organizations, and other entities, including sources of funding.
4. Understand the characteristics that predict participation and lack of participation in SNAP and other FNS programs.

Undercoverage sub-study of FMs on the sampling frame

The objective of this sub-study is:

1. To assess the most recent version of the Agricultural Marketing Service (AMS) Directory for completeness and representativeness of FMs.

Focus groups sub-study with SNAP recipients

The objective of this sub-study is:

2. To explore the market operations factors that serve as facilitators or barriers to shopping at FMs for SNAP recipients.

Overview of National Survey of Nutrition Assistance and Farmers/Farmers markets

A total of 2101 Farmers Market (FM) managers and 443 Direct Marketing (DM) farmers will be invited to participate in the national survey; these participants will represent one of the following four strata:

1. SNAP authorized FMs and DM farmers that redeemed benefits during the last 12 months;
2. SNAP authorized FMs and DM farmers that did not redeem benefits during the last 12 months;
3. FMs and DM farmers that were SNAP-authorized sometime during the past 5-years, but have not been authorized during the last 12 months; and
4. FMS that have never been authorized to redeem SNAP benefits.

The first three strata will be selected from the FNS Store Tracking Redemptions Systems (STARS II) database, and the fourth stratum will be selected from the Agricultural Marketing

Service (AMS) directory. To maximize survey response rates and control costs, the data collection plan will involve a sequence of requests that will vary the mode of data collection and allow respondents to report in the mode that is most efficient for them. Mixing modes allows researchers to compensate for the limitations of each mode, in the hopes of reducing particular forms of survey error, increasing response rates, speeding up data collection, or lowering costs.¹³

Westat and FNS will begin data collection by mailing a study packet via U.S. Postal Service priority mail to all FM manager and DM farmer contacts in the sample that have a street or P.O. Box address. The study packet will include an introductory letter explaining the study (**Appendix A1-A2**); a \$5 incentive and a hard-copy of the FM Manager Survey and the DM Farmer Survey in English (**Appendix B1 and B2**). The letter will ask respondents to either complete the hard-copy survey or go to a secure web site to complete the survey online (**Appendix B5-B6**). Spanish speaking FM managers and DM farmers will also be directed to go the website to access the Spanish survey (**Appendix B3 and B4**) and either download it or complete it online. Next, we will immediately send all contacts who have an email address the introductory letter via email (**Appendix C1-C2**) regardless of

13 de Leeuw, E. D. (2005). To mix or not to mix data collection modes in surveys. *Journal of Official Statistics-Stockholm*- 21 (2):233

whether they received the package in the mail. The email will include a direct link to the secure project web site. Individuals who do not return the hard-copy questionnaire or complete the survey online will be sent a reminder postcard or email (**Appendix D1-D2**) after 1 week, and another reminder email after 2 weeks (**Appendix D3-D4**). Individuals who do not return the hard-copy questionnaire after 4 weeks will be contacted by telephone to complete the survey (**Appendix E1-E2**). We will attempt refusal conversion (**Appendix E3-E4**) as needed to achieve the target response rate of 80 percent.

In a prior national farmers market survey involving farmers market managers,¹⁴ individuals who managed two or more farmers markets were underrepresented in the study. The proposed mixed-mode approach of combining mailed and e-mailed survey instruments with an Internet-based response mechanism helps to reduce the problem of coverage error in administration of surveys.¹⁵ We recognize that it is important to minimize measurement error due to the use of mixed-mode survey and will use the unimode design (also referred to as ‘one

14 Ragland, E., and Tropp D. USDA National Farmers Market Manager Survey (2006). Marketing Services Division, USDA Agricultural Marketing Service, May 2009. <http://www.ams.usda.gov/AMSV1.0/getfile?dDocName=STELPRDC5077203>.

15 Schaefer DR, Dillman DA.(1998). Development of a standard e-mail methodology. *Public Opinion Q.*; 62:378-97.

questionnaire fits all design' by de Leeuw¹³) advocated by Dillman¹⁶ to reduce measurement error. We will follow the guiding principles outlined by Dillman, to ensure that questions are written and presented identically in all modes – and are effective regardless of mode, to make them appropriate for both, visual and oral presentation.

Overview of Undercoverage Sub-study of Farmers markets

FNS indicated that the STARS II and AMS directory represent approximately 85 percent of the farmers markets in the country. This sub-study is designed to determine the extent and characteristics of that undercoverage and in the process, to improve the quality of the Farmers' Market manager sample. Because the STARS II database represents all farmers markets ever authorized to accept SNAP, the markets on the STARS II are 100 percent covered. However, the AMS directory relies on voluntary input from FM managers and therefore may underrepresent the “never” authorized farmers markets. Therefore, the focus of the sub-study is the undercoverage in the never SNAP authorized farmers markets. It is of note that the AMS directory does not include DM farmers. We will not attempt to characterize that undercoverage in this sub-study since there is no public-

16 Dillman, D. A., Smyth, J. D., & Christian, L. M. (2008). Internet, mail, and mixed-mode surveys: The tailored design method. 326-329.

use comprehensive frame of DM farmers, and the effort required to trace and screen all farms (more than 2.2 million) is not in the scope of this study.

The sampling frame for the sub-study will be the 3,143 counties in the US. We will draw a sample of 630 counties, review the list of farmers markets in each county and use the web and other sources to identify new markets. If the putative 15 percent undercoverage rate bears out, we expect to find about 250 farmers markets not currently listed on the AMS file. After unduplicating this list against the STARS database we will select a random subsample of 125 markets. We will obtain contact information for these farmers markets from web searches and contact with extension services and other government agencies. We will mail the National Farmers market Manger Survey to the 125 newly identified market managers and follow the contact procedures detailed above for the national survey to obtain the expected response rate of about 75% or 94 new FM managers.

Overview of Focus Groups Sub-study with SNAP Recipients

The third component involves conducting four focus groups with English-speaking SNAP recipients to supplement the survey data and provide a consumer perspective on farmers market operational factors that enable or hinder SNAP recipients to shop at farmers market.

A sample of SNAP recipients residing within the vicinity of the selected farmers market will be invited to participate in focus group discussions. We will use the focus groups to listen to and gather information from participants regarding their awareness of farmers market in their

neighborhoods, and reasons for shopping (or not) at the market. Two focus group discussions will be held with SNAP recipients who have redeemed SNAP benefits at farmers markets in the past year and two focus group discussions will be held with SNAP recipients who have never redeemed benefits at farmers markets. A copy of the focus group discussion guide and related materials are found in **Appendix F1 - F6**.

Use of the Information

The information gathered in the data collection activities described above will be used by FNS to understand the characteristics of farmers markets and direct marketing farmers and facilitators and barriers to participating in SNAP. These data will inform FNS policy decisions intended to increase the number of DM farmers and farmers markets that participate as SNAP retailers, as well as improve operations for currently authorized DM farmers and farmers markets. The focus group data will be used to conduct exploratory qualitative analysis of facilitators and barriers to shopping at farmers markets as reported by SNAP recipients. The findings from this analysis will assist FNS to promote DM farmers and farmers markets among SNAP clients and identify barriers and facilitators that merit further study.

A.3. 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.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. This study offers technology-based options to respondents to ease burden, as described below.

National Survey of Farmers Market Managers and Direct Marketing Farmers

Two surveys will be used to collect data for the National Survey of FM Managers and DM Farmers. The surveys are designed in two forms - as paper-and-pencil and as web-based surveys. Participants with access to computers and familiarity with web-based surveys can choose to complete this online. Sampled participants who do not complete the paper-and-pencil survey or the web survey will be contacted by telephone to complete the survey and interviewer will conduct the interview using the web survey. We assume that 25% of participants will complete the hard copy survey, 75% will complete the web administered survey or on-line survey (25% will self-

administer and 50% will be telephone administered). The use of a web survey improves accuracy and reduces respondent burden because it includes automatic skip patterns that are built-in to the program.

A.4. Describe Efforts to Identify Duplication.

Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

There is no data similar to that proposed for collection in this study. Every effort has been made to avoid duplication. The data requirements for the study have been carefully reviewed to determine whether the needed information is already available. While in our review of the literature we found one survey, the National Farmers Market Manger Survey (OMB 0581-0169, expiration date: April 30, 2007) conducted by the USDA Agricultural Marketing Service (AMS) as somewhat relevant, this survey does not comprehensively meet the objectives for the current study. The AMS survey was mailed to all farmers markets listed in the AMS farmers market directory and covered a broad range of topics, with a focus on describing the farmers market industry. While the AMS survey included general information regarding participation in federal nutrition assistance programs, it lacked the detailed information about perceived barriers and facilitators for participation in these programs or the prevalence of incentive programs to increase traffic

from SNAP shoppers. We also identified an evaluation of NYC Health Bucks Initiative,¹⁷ which included a survey of farmers market managers. In contrast to the AMS survey and the NYC Healthy Bucks Initiative, the current FM Manager survey is designed to be a nationally representative survey of four strata of farmers markets that are of particular interest to FNS. In addition, unlike the AMS survey and the NYC Healthy Bucks Initiative, the current survey is collecting information on direct marketing farmers. The widespread interest in promoting nutrition assistance programs at farmers markets and direct marketing farmers makes obtaining scientifically-sound information on how nutrition assistance programs fit with current farmers market operations critical.

A.5. If the Collection of Information Impacts Small Businesses or Other Small Entities, Describe any Methods Used to Minimize Burden.

We expect that as much as 85 to 90 percent of the sample of direct marketing farmers and farmers market managers will be small business owners. As with the other respondents, the information being collected from small business owners will be held to the minimum required for the intended use. The self-administered surveys are designed such that they can be done at a time most convenient to respondents. The survey can also be completed

¹⁷ http://www.center-trt.org/downloads/obesity_prevention/interventions/healthbucks/NYC_Health_Bucks.pdf

online. After four weeks of survey mailing, we will attempt to complete the survey with direct marketing farmers by telephone.

A.6. 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 request for clearance is to conduct a one-time data collection. If these data are not collected, USDA/FNS will be unable to improve its understanding of the farmers market environment, particularly barriers to participation in nutrition assistance programs by these markets, in order to identify policy changes that could attract a greater number of farmers markets and SNAP shoppers.

A.7. 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 relating to the Guidelines of 5 CFR 1320.5 for this collection of information. This request fully complies with the regulation 5 *Code of Federal Regulations* 1320.5.

A.8. If Applicable, Provide a Copy and Identify the Date and Page Number of Publication in the Federal Register of the Agency’s Notice, 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.

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 form, and on the data elements to be recorded, disclosed, or reported.

Federal Register

FNS published a notice March 18, 2011 in the Federal Register Volume 76, Number 56, pages 16376-16378 and provided a 60-day period for public comments. We received four comments. **Appendix G1** includes these comments and action taken by the agency in response.

Outside Consultants

The information collection has been reviewed by the National Agricultural Statistics Service of USDA (NASS) with special reference to the statistical procedures. The report prepared by NASS is presented in **Appendix G2**. We have incorporated the reviewer’s comments and

suggestions regarding statistical procedures into Part B of the supporting statement.

FNS also consulted with the following experts:

- Stacy Miller, Farmers Market Coalition, 434-984-0175
- Punam Ohri-Vachaspati, Arizona State University, 602-496-2644

A.9. Explain any Decision to Provide any Payment or Gift to Respondents, Other than Remuneration of Contractors or Grantees.

Achieving high response rates is critical to data quality. An effective incentive can improve initial response rates, which reduces the need for follow-up and decreases survey costs.¹⁸ In addition, incentives disproportionately encourage those less interested in the research to participate, thus reducing non-response bias.¹⁹ Church estimated the effects of incentives on mail survey response rates by employing meta analysis and noted that only those surveys that included rewards (monetary or nonmonetary) in the initial mailing (pre-incentive) yielded significant increase in

¹⁸Berlin, M., Mohadjer, L., Waksberg, J., Kolstad, A., Kirsch, D., Rock, D., and Yamamoto, K. (1993). An experiment in monetary incentives. Proceedings of Survey Research Methods Section of American Statistical Association, 393-8.

¹⁹Groves, R., Singer, E., Corning, A. (2000). Leverage-saliency theory of survey participation: description and an illustration. *Public Opinion Quarterly*. 64(3): 299-308.

response rates.²⁰ In a study comparing response rate by the amount of prepaid incentive provided to participants, the investigators noted a ten percentage point increase in response rate when a \$2 prepaid incentive was included with the invitation letter (compared to no prepaid incentive).²¹ Based on this research, Farmers market managers will receive a prepaid incentive of \$5 for completing the survey. SNAP recipients (living in DC and Baltimore) will receive \$60 for their interactive participation in a 60 minute focus groups. This amount is consonant with what OMB has approved for studies with other low-income focus group participants. In Westat's recent work for the Internal Revenue Service on the Earned Income Tax Credit (EITC), a \$100 incentive was provided for a 90 minute focus group discussion to low-income participants (OMB #: 1545-1349. Four separate focus group task orders were undertaken between 2005-2010; OMB clearance number for *Task Order 13: Earned Income Tax Credit Research Studies - EITC Post Filing Season*

²⁰Church, A.H. (1993). Estimating the effect of incentives on mail survey response rates: a meta-analysis. *Public Opinion Quarterly*. 57:62-79.

²¹<http://www.amstat.org/sections/sgovt/rathbun.pdf>

Marketing Focus Groups with Taxpayers: SOI-336 (April - June, 2009)). For the Healthy Incentives Pilot (OMB #: 0584-0561), FNS will be asking SNAP participants in western Massachusetts to participate in a 90-minute discussion; OMB has approved an incentive amount of \$75 for these participants. A stipend of this amount is typical when conducting focus groups with populations that may incur child care and/or transportation expenses to attend the discussion and should be adjusted to reflect the cost of living in the area where the groups are to take place.

A.10. Explain any Assurance of Confidentiality Provided to Respondents and the Basis for the Assurance in Statute, Regulation, or Agency Policy.

The individuals participating in this study will be assured that the information they provide will not be published in a form that identifies them. No identifying information will be attached to any reports. Identifying information will not be included in the public use dataset.

Westat has extensive experience in data collection efforts requiring strict procedures for maintaining the confidentiality, security, and integrity of data. Specific data handling and reporting procedures will be employed to

maintain the privacy of survey and focus group participants and composite electronic files. These data handling and reporting procedures include requiring all project staff, both permanent and temporary, to sign a confidentiality and nondisclosure agreement (**Appendix H1**). In this agreement, staff pledges to maintain the confidentiality of all information collected from the respondents and will not disclose it to anyone other than authorized representatives of the study, except as otherwise required by law. In addition, Westat has established a number of procedures to ensure the confidentiality and security of electronic data in their offices during the data collection and processing period. A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on March 31, 2000, Volume 65, Number 63, and is located on pages 17251-17252 discusses the terms of protections that will be provided to respondents.

Participants in this study will be subject to assurances and safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the confidential treatment of records maintained by a Federal agency according to either the individual's name or some other identifier.

Participation in the study is voluntary and all respondents will be so informed before beginning either the survey or focus groups. Respondents will also be informed that information provided is private and held in a secure manner and will not be disclosed, unless otherwise compelled by law.

Furthermore, focus group SNAP participants will be assured that participating in the study will not impact their participation in the SNAP program or any benefits to which they are entitled. Finally, focus group participants will be asked permission to audio-record the discussion; a common procedure intended solely to ensure the accuracy of these qualitative data. During the discussion, participants will be identified only by their first name, further ensuring their privacy. Audio-recordings will be stored on Westat's secure network, accessible only to project staff that has been granted access to the password-protected audio files.

Names and phone numbers will not be linked to the data. Survey respondents will have a unique ID number and analysis will be conducted on data sets that include only respondent ID numbers. All data will be securely stored in locked file cabinets or password-protected computers, and accessible only to Westat project staff. Names and phone numbers will be destroyed within 12 months of the end of the contract (end of contract is 9/29/2015).

Institutional Review Board

Westat Institutional Review Board (IRB) serves as the organization's administrative body; it conducts prospective reviews of proposed research and monitors continuing research for the purpose of safeguarding research participants' rights and welfare. All research involving interactions or interventions with human subjects is within the purview of the Westat IRB.

Westat's IRB is the local agent responsible for ensuring that the organization's research: 1) meets the highest ethical standards; and 2) receives fair, timely, and collegial review by an external panel. Westat's IRB currently holds a federal-wide assurance (FWA) of compliance from the U.S. Department of Health and Human Services' Office of Human Research Protections (DHHS/OHRP). The FWA covers all federally supported or conducted research involving human subjects. All study materials and instruments were submitted and approved by Westat's IRB. Copies of the IRB approval letters are in **Appendix H2**.

A.11. 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.

The survey questions and focus group discussion topics are not considered to be sensitive. Participants can choose to not answer any question and participation in the study is voluntary. All of the survey questions were developed through formative research which involved in-depth interviews with nine farmers market managers and researcher

observations at five of the nine markets. Subsequently, a survey questionnaire was developed and all survey items have been cognitively tested with FM managers and DM farmers; no respondent indicated unwillingness to answer the question or discomfort with providing a response.

A.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. 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 14 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table A12.1 shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection and for total burden.

The estimated annualized cost to respondents for the retailer survey is based on the *May 2009 National Occupational Employment and Wage Estimates for the United States*, available at

www.bls.gov/oes/current/oes_nat.htm, for job category “First-Line Supervisors / Managers of Farming, Fishing, and Forestry,” occupation code #45-1011, with a median wage of \$20.12 per hour. The estimated annualized cost to focus group participants is based on the national minimum wage of \$7.25 per hour.

Table A.12A Respondent Burden and Cost Estimate

Affected public	Respondent		Number of Respondents	Responses Annually Per Respondent	Total Annual Responses	Estimated Hours Per Response	Estimated Total Hours	Annualized Cost of Respondent Burden
Business (for profit)	FM manager	Pretest*	11	1	11	1	11.00	221.32
		Completed	1345	1	1345	0.3596	483.66	9731.28
		Attempted	336	1	336	0.0167	5.61	112.90
	New FM Manager (undercover age study)	Completed	184	1	184	0.3596	66.17	1331.27
		Attempted	61	1	61	0.0167	1.02	20.50
	SUBTOTAL			1937		1937		567.46
Business (not for profit)	FM manager	Completed	336	1	336	0.3596	120.83	2431.01
		Attempted	84	1	84	0.0167	1.40	28.22
	New FM Manager (undercover age study)	Completed	4	1	4	0.3596	1.44	28.94
		Attempted	1	1	1	0.0167	0.02	0.34
	SUBTOTAL			425		425		123.68
Farms	Direct Marketing Farmers	Pretest*	3	1	3	1	3.00	60.36
		Completed	353	1	353	0.4167	147.10	2959.55
		Attempted	89	1	89	0.0167	1.49	29.90
	SUBTOTAL			445		445		151.58
Individuals or Households	SNAP Recipient FG Screened and Participants	Completed	32	1	32	1.4	44.8	325.47
		Attempted	20	1	20	0.0334	0.67	4.86
	SUBTOTAL			52		52		45.47
ALL	TOTAL		2859		2859		887	17286.00

* FM Manager and DM Farmer surveys were tested in two rounds; no more than 9 respondents were asked the same question

A.13. Provide Estimates of 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 estimates should be split into two components: (a) a total capital and start-up costs component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

A.14. Provide Estimates of Annualized Cost to the Federal Government.

Also, 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.

Contractor costs associated with this study total \$1,202,000, with an estimated \$400,666 annual cost to the federal government. This is based on an estimate of 10,239 labor hours, with a salary range of \$30.46 - \$236.60 per hour and includes instrument development, data collection, analysis, reporting, and overhead costs, including computing, copying, supplies, postage, shipping, and other miscellaneous items. The cost of the FNS employees involved in project oversight with the study is estimated at \$12,069 annually; for a combined total of \$412,735 annually.

A.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 of information. This program change is estimated to add 887 burden hours, at an annualized cost of \$17,286 to the OMB collection inventory.

A.16. For Collections of Information whose Results are Planned to be Published, Outline Plans for Tabulation and Publication.

Time Schedule

The schedule for the study showing sample selection, beginning and ending dates of collection of information, completion of reports, and publication dates is shown on Table A16.1.

Table A16.1. Data Collection and Reporting Schedule

Activity	Schedule
Farmers market survey data collection	Sep. 1, 2011-January 15, 2012
Focus groups with SNAP recipients	February 1-11, 2012
Focus group draft 1 report	March 12, 2012
Focus group final report	April 9, 2012
Survey data cleaning, analysis and file production	January - April 2012
Preliminary data tables	April 9, 2012
Final data tables and data delivery	May 18, 2012
1 st draft final report	June 8, 2012
2 nd draft final report	July 6, 2012
Phase II final report	August 31, 2012
Draft debriefing materials	July 6, 2012

Analysis Plan

The main lines of analysis follow the study objectives outlined in section A.2. Exhibit A16.2 presents an overview of the research objectives, data collection activities, and reports that this study will produce for future policy development regarding point-of-purchase financial incentives.

Exhibit A16.2. Objectives, Principal Data Sources, and Reports

Objectives	Data source	Reports
1. Understand the characteristics of FMs, both SNAP-authorized and not SNAP-authorized	Survey of farmers market managers and direct marketing farmers	FINAL
2. For SNAP-authorized markets, understand the relationship of characteristics to the way the program works (system of redemptions, volume of redemptions, information available, etc) in that setting.	Survey of farmers market managers and direct marketing farmers	
3. Understand connections to other markets, support organizations, and other entities, including sources of funding.	Survey of farmers market managers and direct marketing farmers	
4. Understand the characteristics that predict participation in SNAP and lack of participation in SNAP and other FNS programs	Survey of farmers market managers and direct marketing farmers	

<p>5. Understand perceptions of barriers and facilitators to SNAP participation, including why formerly authorized markets chose not to continue to participate and why never authorized markets have chosen not to participate to date.</p>	<p>Survey of farmers market managers and direct marketing farmers</p>	
<p>6. Compare the characteristics of the newly identified markets to the characteristics of “never” authorized markets that were sampled from the AMS file.</p>	<p>Survey of farmers market managers</p>	
<p>7. Understand facilitators and barriers to shopping at the farmers market.</p>	<p>Focus group discussion with SNAP recipients</p>	

Publication of Study Results

The study's findings will be presented in reports that will undergo peer review. Once final, FNS will make the reports available on its web site. Findings may also be published in one or more professional journals and publications intended for general or trade audiences, such as nutrition educators or food retailers.

A.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.

All data collection instruments will display the OMB approval number and expiration date.

A.18. Explain Each Exception to the Certification Statement Identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this study.