

APPENDIX H

Child and Adult Care Food Program (CACFP)

Improper Payment Meal Claims Assessment

(OMB No.: 0584-NEW)

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**Appendix H:
USDA/NASS Observations of Child and
Adult Care Food Program (CACFP)
Improper Payment Meal Claims
Assessment Docket**

APPENDIX J: OBSERVATIONS OF CHILD AND ADULT CARE FOOD PROGRAM (CACFP) IMPROPER PAYMENT MEAL CLAIMS ASSESSMENT DOCKET.

Supporting Statement – Part A

Item A-12

- 1. Comment:** It appears that the survey will have a 100% response rate and that each questionnaire will be completed on the first attempt. However, you have included scripts for the interviewers to use in follow up contacts. The burden needs to be accounted for on each contact.

Response: The burden table initially included time for follow-up calls in the estimates presented for contacting States, Sponsors, and FDCHS to obtain the data necessary for developing the sample frame. It should be clarified that States, Sponsors and FDCHS are not being surveyed; rather they are being contacted to obtain administrative data required to create the sample frame for the study. The table has been modified to add these additional contacts as separate rows for each contact for which a follow-up script has been prepared and included in the OMB package.

- 2. Comment:** You will also need to estimate the number of respondents who will not be able to complete the forms in one attempt.

Response: Respondents to the parent telephone survey will be required to complete all questionnaires in one attempt in order to prevent bias in recall and selectively changing of responses.

- 3. Comment:** There is no mention of burden associated with pre-survey letters, or publicity materials being used to inform the respondents of the importance of this survey or why they should participate.

Response: Pre-survey letters or publicity materials are not being distributed to family day care home providers or parents of the sampled children prior to their being requested to collecting the required information from them. Pre-notification of the study to either the family day care home providers or the parents might jeopardize the validity of their responses.

- 4. Comment:** On the questionnaire, I didn't see any mention of whether the survey is voluntary or mandatory.

Response: Participation in the telephone recall survey is voluntary and language to that effect will be included by the contractor in the recruitment and introduction materials for participants.

- 5. Comment:** On the forms that will be seen by the respondents, I did not see the OMB # and expiration date printed, also, I did not see the burden statement (length of time it would take to complete the questionnaire(s)).

Response: The OMB# and expiration date will be printed by the contractor on all survey instruments and forms, as required. A burden statement, including the estimated length of time to complete the questionnaire(s), will be included on all survey instruments and forms, as required.

6. Comment: In Section A – Supporting Statement, Item 9 you mention a \$10 response incentive, but in Appendix G, you mention a stipend of \$20.

Response: This discrepancy in the amount of reimbursement to be offered has already been identified and the discrepancy will be corrected by the contractor.

7. Comment: In Appendix H you are collecting information about the children being observed. You are getting the child's name and birth date along with the parent's names. I am not aware if there are any legal requirements that govern if you need to get a signed consent form from the parents before you collect any information concerning a minor.

Response: The data collection efforts that are the focus of this clearance package will be conducted in accordance with all relevant federal regulations and requirements, including the Privacy Act (5 USC 552a). Data to be collected will not be released with individual child, parent, day care provider, or sponsor identifiers. Data will be presented in aggregate statistical form only. A statement to this effect will be read to parents/guardians before administering the telephone survey.

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Supporting Statement – Part B

The underlying methodology seems sound.

8. Comment: Regarding validation methods: Is it anticipated that parent awareness of meals provided will increase during the in-home observation period (will parents be aware of the study prior to conclusion of the observational period, as it occurs over two days), so the validation process may not reflect the accuracy/precision of the parent-recall interview as an estimator of meals provided outside the observation period (i.e. in the full national study)?

Response: It is possible that parents may be aware of an observer in the home during several days in the observation week. However, parents will not be aware that some of them will be contacted regarding the meals served to their children during the observation week. Parents will only be contacted after the end of the week in which the observations have taken place. Conducting the observations in the week preceding the parent interviews is required to validate the parents' recall. It is not anticipated that awareness of observers in the home by the parents will negatively impact the validity of this assessment.

9. Comment: Similarly, will the “monitoring visit typically conducted by the sponsor” occur frequently enough that observation during the feasibility study is anticipated to have a minimal effect on interview response?

Response: Monitoring visits in family day care homes by States and sponsors is a routine and on-going requirement in the Child and Adult Care Family Program. A sponsor conducted monitoring visit is not expected to negatively impact the validity of this assessment.

10. Comment: I assume the states “identified after the national sample was drawn” for the pretest were eligible to be selected for the study, and were only used in the pretest after they were not selected during sampling (so the study is nationally representative)?

Response: States identified for the pretest were eligible for inclusion in the study sample. Pretest states were identified only after the sampling was completed. States used for the pretest were not selected during sampling, so the study is nationally representative.

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