

SUPPORTING STATEMENT PART A FOR

**Nutrition Assistance in Farmers markets: Understanding the Shopping Patterns
of SNAP Participants**

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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.

The study titled “**Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants**” is a revision to a previous collection of information (OMB Number 0584-0564; Expiration Date November 30, 2014). The study, planned for FY 2012-2013, affirms the United States Department of Agriculture’s and the Food, Nutrition and Consumer Services (USDA and FNCS) priority for expanding the farm-food connection in Food and Nutrition Service (FNS) programs.¹ Section 17 [7 U.S.C. 2026] (a)(1) of the Food and Nutrition Act of 2008 provides general legislative authority for the planned data collection. This section authorizes the Secretary of Agriculture to enter into contracts with private institutions to undertake research that will help to improve the administration and effectiveness of Supplemental Nutrition Assistance Program (SNAP) in delivering nutrition-related benefits.

This study is the second of three related studies. The first, Nutrition Assistance in Farmers’

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

Markets: Understanding Current Operations (FM Ops), was approved under information collection OMB Number 0584-0564; Expiration Date November 30, 2014. The final proposed study will explore the market operation characteristics that influence SNAP recipients' decisions to shop at farmers markets.

Background

Fewer than 1 in 10 Americans meet the Dietary Guideline Recommendations for fruit and vegetable consumption (Kimmons, 2009), and intakes are less likely to be adequate for low-income Americans and participants in Food Nutrition Service (FNS) SNAP (USDA, 2008). SNAP is the largest domestic food and nutrition assistance program for low-income households; in FY 2010, SNAP served about 1 in 8 Americans each month.²

However, the redemption of SNAP benefits for fresh fruits and vegetables at farmers markets remains quite low. Over the past 5 years, the number of farmers markets authorized to accept SNAP benefits has increased over 250 percent and SNAP redemptions at farmers markets have increased about 49 percent. Despite this growth, in FY 2010 only about 0.01 percent of all SNAP redemptions were made at farmers markets.³ As a comparison, consumers overall spent about 0.2 percent or 20 times more than SNAP recipients at farmers markets (Briggs, 2010).

Because SNAP serves over 45 million Americans, it is imperative to understand why so few SNAP participants redeem benefits at farmers markets. No large study has been conducted with a representative sample of SNAP participants to try to determine what factors influence SNAP

²<http://www.ers.usda.gov/Briefing/SNAP/>

³<http://www.fns.usda.gov/snap/retailers/pdfs/2010annualreport.pdf>

participants' decisions to shop at farmers markets. The proposed study will provide information on shopping behaviors for fresh fruits and vegetables of SNAP participants who purchase food in a catchment area around a nationally representative sample of farmers markets that redeemed at least \$1,000 in SNAP benefits from June 2010 through May 2011. In addition, the study will use this survey data to develop questions for more in-depth focus group discussions with a limited number of the same survey participants. The primary objective of the study is to increase FNS' understanding of factors that facilitate and hinder SNAP participants' shopping at farmers markets. These findings will enable FNS to develop and implement policies and practices for increasing participation for program participants to realize the benefits of greater access to healthy and fresh foods.

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 survey of SNAP participants and the study's primary goal is to determine facilitators and barriers contributing to SNAP participants' decisions to shop at their local farmers market.

Study Objectives

The objectives of this study are to:

1. Understand the shopping patterns of the SNAP participants redeeming benefits at farmers markets.
2. Understand why some SNAP households do not shop at farmers markets.
3. Understand the characteristics of the farmers markets serving the participants surveyed.

Overview of National Survey of Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants

An initial sample of 4,625 SNAP participants will be invited to participate in the national survey; these participants will represent one of the following two strata:

1. SNAP participants who used their SNAP/Electronic Benefits Transfer (EBT) card at a farmers market in the last 12 months;
2. SNAP participants who did not use their SNAP/EBT card at a farmers market in the last 12 months.

A reserve sample of 1,295 SNAP participants is available for release if a response rate of 80% is not achieved.

See Section B.1.3.

The SNAP participants will be selected using a two-stage process. The first stage was to identify a nationally representative sample of 50-70 SNAP authorized farmers markets with more than \$1,000 in SNAP EBT redemptions (for more detail,

see Supporting Statement B). The sample will be drawn from the initial task of the data collection, the Nutrition Assistance in Farmers' Markets: Understanding Current Operations (FM Ops), (OMB #: 0584-0564; Expiration Date November 30, 2014). The data collection for the initial task is complete, but the data analysis that will support this study, task 2, is underway. The initial task is scheduled to complete in February 2013. The second stage is to select a sample of SNAP participants who have made purchases with their SNAP/EBT card at farmers markets or other retailers near the sampled farmers market. To maximize survey response rates and control costs, the data collection plan will involve two modes of data collection and allow respondents to answer in the mode that is most efficient for them. Using more than one mode of data collection allows researchers to compensate for the limitations of each mode; consequently reducing survey error, increasing response rates, speeding up data collection, and/or lowering costs.⁴

Westat and FNS will begin data collection by mailing a study packet via priority mail to all SNAP participants 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 cash incentive in the amount of \$5 or \$10 (see further discussion

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

on incentive experiment in A.9) and a paper survey in English (**Appendix B1**). To reach Spanish-speaking SNAP participants, the letter will also be written in Spanish (**Appendix A2**).

Spanish-speaking SNAP participants will be instructed to contact the study through a toll-free number to request a paper survey in Spanish. One week after the first survey mailing, an automated call will be placed to the participants' phone number on file to remind them to complete the survey (**Appendix D5-D6**). Three weeks after the first survey mailing, individuals who do not return the survey will be sent a second survey packet that will include a reminder letter (**Appendix C1-C2**) and the survey in English. For those who have expressed interest in receiving materials in Spanish, this letter and survey will be sent in Spanish (**Appendix B2**). One week after the second survey mailing, an automated call will be placed to the participants' phone number on file to remind them to complete the survey (**Appendix D5-D6**).

Individuals who do not return the survey within three weeks after the second survey mailing will be contacted by telephone (**Appendix D1-D2**) to complete the survey over the telephone (**Appendix B3-B4**). We will attempt refusal conversion (**Appendix D3-D4**) as needed to achieve the target response rate of 80 percent.

The proposed mixed-mode approach of combining mailed and telephone survey instruments helps to reduce the problem of coverage error in administration of surveys.⁵ We will use the unimode design (also referred to as ‘one questionnaire fits all design’ by de Leeuw⁴) advocated by Dillman⁶ to reduce the potential measurement error. We will follow the guiding principles outlined by Dillman, to ensure that questions are written and presented identically in both modes – and are effective regardless of mode, to make them appropriate for both, visual and oral presentation.

Overview of Focus Groups with SNAP Recipients

An additional component involves conducting four focus groups with SNAP recipients in three different cities to supplement the survey data and provide a more in-depth understanding of SNAP recipients’ perceptions of, attitudes towards and shopping behaviors with respect to farmers’ markets. Typically each group will consist of 8-12 participants. Eight of these groups (two cities) will be conducted with English speakers; four of the groups (a third city) will be conducted with SNAP recipients who self-identify

⁵ Schaefer, D. R., Dillman, D. A. (1998). Development of a standard e-mail methodology. *Public Opinion Q.*; 62:378-97.

⁶ Dillman, D. A., Smyth, J. D., & Christian, L. M. (2008). Internet, mail, and mixed-mode surveys: The tailored design method. 326-329.

as Latino who either speak only Spanish or are conversant in both English and Spanish.

The criteria for selecting the cities for the English language groups have emerged from our FM Ops focus group findings, which suggest that the degree to which farmers' markets are viewed by SNAP recipients as an important source of fresh fruits and vegetables may vary by context. In cities where food distribution networks in low-income neighborhoods are strongly developed, SNAP recipients may opt to obtain fresh produce from food pantries or other local distributors and save their EBT benefits for other items that are not so easily obtained. In locales where such networks are underdeveloped, the farmers' markets may take on a different role. For the English language groups we will select one city that represents each of these food network conditions.

We will further narrow our focus in each city by identifying a market or markets that are located in areas where households receiving SNAP benefits make up a significant portion of the population. Through web-based research, Westat staff will identify a location for the focus groups that is centrally located, easily accessed by public transportation, and that is handicapped-accessible. Locations we have used successfully in the past have included community meeting rooms at local libraries, community centers, and places of worship.

Westat staff will work with local resource networks – e.g., food pantries, grocery stores, local clinics, job development centers, SNAP offices,

churches – to post recruitment flyers (**Appendix E11-E12**) throughout the catchment area. An initial set of resources will be identified through internet research and contacted by a Westat staff member. Staff will explain the study, ask if the facility is willing to post a flyer for the group, and also ask if there are additional individuals or locations we should contact about posting the flyers. Staff will make phone calls or send emails to this second tier of contacts, again explaining the purpose of the study and asking if the facility is willing to post a recruitment flyer. Interested individuals can call the toll-free number on the flyer and be screened for eligibility.

In each site, we will hold two focus groups with individuals who shop at farmers' markets "frequently," which is defined as having shopped one or more times a month during the months when the market is operating. The frequent shoppers can help FNS learn what factors facilitate SNAP recipients' shopping at farmers' markets and what strategies the agency might employ to encourage other SNAP recipients to shop at these locations. We will also hold two focus groups in each city with individuals who are "non-shoppers." There are two categories of non-shoppers we will recruit: first, those who have shopped at a farmers' market two times or fewer in the previous year. These individuals have some experience with the market, but for reasons we want to discover, opted not to return. The second group of non-shoppers consists of those individuals who have not shopped at the market in the past year, but who do know about the market. This second group of individuals is of particular interest because they know of the

market in some capacity (i.e., they at least know it exists as a shopping venue), but have chosen not to make any purchases there. The non-shoppers will help FNS learn what the common barriers are to shopping at farmers' markets and if there are particular policy areas that can be addressed to reduce these barriers.

For each of these English-language groups, we will recruit participants who have a mix of characteristics that may influence shopping behaviors. These include gender, race, and level of education, as well as age and family structure. In particular, we will endeavor to recruit three individuals for each group who are over age 65 and who may receive Senior vouchers for the farmers' markets, and three parents of young children, who may be receiving WIC vouchers.

The four groups with self-identified Latinos/Latinas will examine the extent to which acculturation is a factor in whether or not SNAP recipients shop at local farmers' markets. The speakers' use of Spanish exclusively versus his/her use of both English and Spanish will serve as a proxy for degree of acculturation. Two groups will be conducted with individuals who are comfortable speaking only Spanish; two groups will be held with individuals who indicate they are comfortable speaking both Spanish and English. Our main criterion for city selection is that the Spanish speaking population must have some historical depth in the location, i.e., it is not an entirely recent immigrant population.

Recruitment will occur the same way for Spanish language groups as indicated above for our English language groups. Westat staff will work with the community resource network to distribute recruitment flyers in Spanish. Interested individuals can call the toll-free number at Westat, where they will be screened for eligibility by a Spanish-speaking staff member. As with the English language groups, we will endeavor to recruit individuals who have a mix of demographic characteristics, including gender, age, level of education, and parents of young children. Westat staff will also identify an easily accessible community location (e.g., community center, library) where these four focus groups can be held.

For all 12 focus groups, participants will be served a light meal (sandwiches, fruit) and all will receive \$60 as a token of appreciation at the end of each discussion.

A copy of the focus group discussion guides, recruitment flyers, recruiting screening tool, and related materials are found in **Appendix E1 - E12**.

Use of the Information

The information gathered in the survey and focus groups described above will be used by FNS to understand the facilitators and barriers for SNAP participants to shop at farmers markets. These data will inform FNS policy decisions intended to increase participation for program participants and realize the benefits of greater access to healthy and fresh foods.

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.

This study offers technology-based options to respondents to ease burden, as described below.

Automation of Participant Data Collection. In compliance with E-Government Act 2002, to reduce burden to the respondent and improve data quality, for approximately 25% of the study participants, the SNAP participant survey will implement the use of computer-assisted data collection technology. The use of computer-assisted data collection technology reduces the survey completion time - automated skip patterns that are built-in to the program ensure that respondents are asked only relevant questions, based on their response. The branching and skip patterns applied by the system will prevent staff from mistakenly skipping sections, or asking the wrong questions during interviews. We expect approximately 75% of the study respondents to complete a paper copy of the survey. The survey will be formatted to ensure ease of use and will have clear directions that will assist the participant to ensure that they are only answering relevant questions, based on their responses.

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. In our review, we identified several studies examining how food shopping decisions are made, particularly those involving SNAP recipients and decision to shop at farmers markets. Only one large national study was identified, the remaining were conducted at the individual market level or at a state level. While a few studies involved Food Stamp recipients⁸ who shopped at farmers markets^{7,8}, others involved a random sample of State residents who do not shop at farmers markets. For example, Briggs et al. Conner and colleagues¹ conducted in-depth interviews with 27 individuals, organizations, and state representatives to gather their perspectives on challenges faced by SNAP recipients in redeeming their SNAP benefits at farmers markets. Similarly, Conner and coworkers conducted a telephone survey of 953 Michigan residents to examine attitudes and preferences for local foods and farmers markets. Similarly, Grace and coworkers⁹ examined the perceptions of 108 food stamp recipients to shopping at farmers markets.

The current survey is designed to include shoppers as well as non-shoppers at farmers markets. In addition, unlike other studies, the current survey is collecting information on the importance of incentives to shop at farmers markets. Finally, combining the survey data with the redemption pattern of EBT usage in stores in the catchment area, Geospatial Information Systems (GIS) will provide valuable information on shopping patterns of SNAP recipients and how farmers markets fit in their overall shopping patterns.

7 Briggs S, Fisher A, Lott M, Miller S, Tessman N. Real Food, Real Choice. Connecting SNAP recipients with Farmers Markets. June 2010.

http://www.foodsecurity.org/pub/RealFoodRealChoice_SNAP_FarmersMarkets.pdf

8 David Conner, Kathryn Colasanti, R. Brent Ross, Susan B. Smalley. Locally Grown foods and farmers markets: consumer attitudes and behaviors. *Sustainability*, 2010, 2, 742-756. Open access: www.mdpi.com/2071-1050/2/3/742/pdf

9 Christine Grace, Thomas Grace, Nancy Becker, Judy Lyden. Barriers to using Urban Farmers Market: An investigation of Food Stamp Clients' Perceptions. October 2005. <http://oregonfarmersmarkets.org/EBT/docs/BarrierstoUsingFarmersMarkets102206.pdf>

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

The data collection plan has no impact on small businesses or other small entities.

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 this information collection is not conducted, USDA/FNS will be unable to improve its understanding of what factors influence SNAP shoppers' decisions to shop at farmers markets, in order to identify policy changes that could attract program participants to healthier and fresher foods.

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 December 22, 2011 in the Federal Register Volume 76, Number 246, pages 79646-76948 and provided a 60-day period for public comments. We received 2 comments. **Appendix F1** includes these comments and **Appendix F2** includes the action taken by the agency in response.

Outside Consultants

FNS also consulted with the following experts:

- Darcy Freedman, University of South Carolina, 803-777-1326
- Punam Ohri-Vachaspati, Arizona State University, 602-496-2644

- On October 17, 2011 FNS and Westat held a stakeholders meeting with representatives of eight organizations closely involved with the Farmers Market community to obtain their input on the research study. The opinions expressed during this meeting helped inform the overall study design and the contents of the survey instrument. After the meeting, there have been ongoing follow-up communications with the stakeholders to obtain further input on the survey instrument.
- The information has been reviewed by Leanne Tang, 202-720-6957, of the Methods Branch of USDA's National Agricultural Statistics Service (NASS), with special reference to the statistical procedures. See the NASS comments in **Appendix F3**.

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

SNAP clients are a diverse group. Because benefits are available to most low-income households with few resources, regardless of age, disability status, or family structure, participants represent a broad cross-section of the Nation's poor (USDA, 2011). While we know a lot about the characteristics of SNAP clients, there is a lack of research on how to reach and implement effective

studies with SNAP clients. While this study obtains valuable information on the determinants of SNAP participants' decision to use their EBT card at the Farmers Markets, it also provides a unique opportunity to implement an "incentive experiment" to better understand the type of incentive schemes that may work best for future SNAP client surveys.

One possible method of providing an incentive is to include a small cash payment with the advance materials. The research on pre-paid incentives generally finds that small incentives, of approximately \$1 or \$2, have significant effects on mail¹⁰ and interviewer-administered surveys^{11,12}. This same research has found that there are smaller gains in response rate for pre-paid incentives above \$2. For example, Trussell

10 Church, Allan H. 1993. "Estimating the Effect of Incentives on Mail Survey Response Rates: a Meta-Analysis". *Public Opinion Quarterly* 57:62-79.

11 Cantor., D., O'Hare, B. and O'Connor, K. (2007) "The Use of Monetary Incentives to Reduce Non-Response in Random Digit Dial Telephone Surveys" pp. 471-498 in J. M. Lepkowski, C. Tucker, J. M. Brick De Leeuw, E., Japac, L., Lavrakas, P. J., Link, M. W., & Sangster, R. L. (Eds.), *Advances In Telephone Survey Methodology*, New York: J.W. Wiley and Sons, Inc.

12 Singer, Eleanor, John Van Hoewyk, Nancy Gebler, Trivellore Raghunathan, and Katherine McGonagle. 1999. "The Effect of Incentives on Response Rates in Interviewer-Mediated Surveys". *Journal of Official Statistics* 15:217-230.

and Lavrakas¹³ found a 13 point increase in response rate between \$0 and \$2, and a 6 point increase between \$2 and \$5. Similar differences between \$2 and \$5 for telephone surveys were found by Brick et al.¹⁴ Recent research associated with the National Household Education Survey has found increases of 5 percentage points when comparing \$5 to \$20.

A second possible method is to promise the respondent a cash incentive for completing the survey. The research on promised incentives is not as definitive. In a meta-analysis of mail surveys, Church (1993) did not find a significant effect of small (\$1, \$2) promised incentives. Inconsistent effects have been found for interviewer-mediated surveys. In a meta-analysis of both telephone and personal interviewing, Singer found significant effects of promised incentives (Singer, et al. 1999). In contrast, a review of more recent random digit dial (RDD)

13 Trussell, N. and P. Lavrakas (2004) "The influence of incremental increases in token cash incentives on mail survey responses. Is there an optimal amount?" *Public Opinion Quarterly*, 68(3): 349 - 367.

14 Brick, J. Michael, Jill Montaquila, Mary Collins Hagedorn, Shelley Brock Roth, and Christopher Chapman. 2005. "Implications for RDD Design from an Incentive Experiment". *Journal of Official Statistics*. Forthcoming

surveys did not find consistent effects (Cantor et al. 2008). For example, Singer et al¹⁵ found a \$5 promised incentive to increase response rates at the screening stage by 7.4%. However, a number of other studies have found no effect of a promised incentive for a screening interview (Cantor et al. 2008: Table 22.3)¹¹. One reason why this might be the case is that a promise of money at the screener, which is the initial contact with the household, may sound more like a sales-pitch than a serious survey. There has been more success when promising significantly more money when requesting to complete an extended interview of RDD respondents. For example, Strouse and Hall¹⁶ did not find a significant effect of amounts in the \$0 - \$10 range, but did find a significant effect of \$35 Cantor et al¹⁷ report an effect of 9.1 percentage points when offering \$20. Other studies have found amounts of \$25 or more

15 Singer, Eleanor, John Van Hoewyk, and Mary P. Maher. 2000. "Experiments with Incentives in Telephone Surveys". *Public Opinion Quarterly* 64:171-188.

16 Strouse, Richard C., and John W. Hall. 1997. "Incentives in Population Based Health Surveys". *Proceedings of the American Statistical Association, Survey Research Section*: 952-957.

17 Cantor, David, Kevin Wang, and Natalie Abi-Habib. 2003 "Comparing Promised and Pre-Paid Incentives for an Extended Interview on a Random Digit Dial Survey". *Proceedings of the American Statistical Association, Survey Research Section*.

have been effective at the point of refusal conversion (Fesco, 2001),^{18,19}

There has been almost no research on the combination of a pre- and a promised incentive, even though these schemes are used on some surveys. Three questions that are of particular interest are:

1. To what extent does the combination of pre and promised incentives increase response rates?
2. Is it better to simply use one of the more effective methods (e.g., just a pre-paid or just a post-paid), rather a combination of the two?
3. Under either scenario, what are the best levels of incentives to use?

The proposed experiment seeks to add to the above questions by testing pre- and promised-incentives on responses rates and data quality. The information learned from this experiment will inform decisions on incentives and the impact on response rates for future studies with similar study populations. For pre-incentive payment, we are proposing payments of, \$5 and \$10. For post-incentive payment, we are proposing payments of \$10 and \$20. Therefore, the study will have 4 conditions.

18 Currivan, Doug. 2005. "The Impact of Providing Incentives to Initial Telephone Survey Refusers on Sample Composition and Data Quality". Paper presented at the Annual Meeting of the American Association of Public Opinion Research, Miami Beach, FL.

19 Olson, Lorayn, Martin Frankel, Kathleen S. O'Connor, Stephen J. Blumberg, Michael Kogan, and Sergei Rodkin. 2004. "A Promise or a Partial Payment: the Successful Use of Incentives in an RDD Survey". Paper presented at the Annual Meeting of the American Association of Public Opinion Research, Phoenix, AZ.

In addition, individuals who participate in the focus groups will receive a \$60 cash incentive at the end of each of the discussions. This amount is intended to increase response rate without enticing participation in the study. OMB has approved this amount as an incentive for previous SNAP recipient focus groups [e.g., Task 1 under this contract] and we believe it to be a reasonable incentive amount for the groups under this proposed study.

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 privacy, 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 G1**). In this agreement, staff pledges to maintain the privacy 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 privacy 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, 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.

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 G2**.

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 not to answer any question and participation in the study is voluntary. A survey questionnaire was developed and all survey items have been cognitively tested with SNAP participants; 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 A12A shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection and for total burden. The current OMB Inventory for OMB 0584-0564 (Expiration Date November 30, 2014) is 17,499 hours. This information collection will add 3,758 burden hours.

The estimated annualized cost to survey respondents and focus group participants is based on the national minimum wage of \$7.25 per hour.

Table A.12A Respondent Burden and Cost Estimate

Affecte d public	Respon dent		Number of Respond	Respon ses Annually	Total Annual Respon	Estimate d Hours Per	Estimate d Total Hours	Annualize d Cost of Responde
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			ents	Per Respond	ses	Respon e**		nt Burden
Individuals or Households	SNAP recipient's survey	Pretest*	24	1	24	1	24.00	174
		Completed	3,700	1	3,700	0.95	3515.00	25483.75
		Attempted	925	1	925	0.0333	30.80	223.318125
	SNAP recipient focus groups	Completed	120	1	120	1.333	159.96	1159.71
		Attempted	840	1	840	0.0333	27.97	202.797
ALL	TOTAL		5609		5609		3757.73	27,243.58

* SNAP recipients were tested in two rounds; no more than 9 respondents were asked the same question.

** Includes response time for advance letters and recruiting material.

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 \$1,296,608, with an estimated \$864,405 annual cost to the federal government. This is based

on an estimate of 9,905 labor hours, with a salary range of \$25.33 – \$255.90 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 \$18,000 annually; for a combined total of \$882,405 annually. Added to the current cost of this information collection, \$412,735, the total estimated cost is \$1,295,140.

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 revision to a previous collection of information. This ICR is for the second of three related studies. The first, Nutrition Assistance in Farmers' Markets: Understanding Current Operations (FM Ops), was approved under information collection OMB Number 0584-0564; Expiration Date November 30, 2014. This second part of the study will add 3757.73 burden hours to the OMB collection of 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
SNAP recipient survey data collection	August 13 -November 5, 2012
Focus groups with SNAP recipients	October-November, 2012
Focus group draft 1 report	December, 2012
Focus group final report	January, 2013
Survey data cleaning, analysis and file production	August - November 2012
Preliminary data tables	October 29, 2012
Final data tables and data delivery	December 24, 2012
1 st draft final report	January 21, 2013
2 nd draft final report	February 25, 2013
Final Report	April 19, 2013
Draft debriefing materials	February 25, 2013
Briefing for audiences selected by FNS	March 13, 2013
Revised briefing materials	March 20, 2013

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 what types of foods do SNAP recipients purchase, with what frequency, and when in the market season	Survey of SNAP participants and focus group discussion with SNAP participants	FINAL
2. Understand whether shopping patterns vary by time in the redemption month, size of the benefit, availability of specific produce items, other reasons.	Survey of SNAP participants and focus group discussion with SNAP participants	
3. Understand the top reasons why SNAP participants shop at farmers markets.	Survey of SNAP participants and focus group discussion with SNAP participants	
4. Understand what it would take to increase SNAP participants' patronage of farmers markets.	Survey of SNAP participants and focus group discussion with SNAP participants	
5. Understand where SNAP participants redeem most of their benefits and why.	Survey of SNAP participants and focus group discussion with SNAP participants	

<p>6. Understand how prices of fresh fruits and vegetables sold at farmers markets compare with the prices for similar foods at other food retailers.</p>	<p>Survey of SNAP participants and focus group discussion with SNAP participants</p>	
<p>7. Understand whether SNAP participants are aware that benefits can be redeemed at farmers markets.</p>	<p>Survey of SNAP participants and focus group discussion with SNAP participants</p>	
<p>8. Understand the perceived barriers to shopping at farmers markets</p>	<p>Survey of SNAP participants and focus group discussion with SNAP participants</p>	
<p>9. Understand how shopping patterns and characteristics of households who do not shop at farmers markets compare to those who do.</p>	<p>Survey of SNAP participants and focus group discussion with SNAP participants</p>	
<p>10. Understand what changes would make the local farmers market a more appealing place to redeem SNAP benefits</p>	<p>Survey of SNAP participants and focus group discussion with SNAP participants</p>	
<p>11. Understand whether the farmers market is accessible by public transportation</p>	<p>Survey of SNAP participants and focus group discussion with SNAP participants</p>	

12. Understand the hours of operation and the length of the farmers market season	Focus group discussion with SNAP participants and FM Ops data	
13. Understand whether the farmers market provides outreach to the low-income community.	Focus group discussion with SNAP participants and FM Ops data	
14. Understand what services are offered/ available in the vicinity of the farmers market	Focus group discussion with SNAP participants, FM Ops data and Geospatial databases	
15. Understand what food retailers are within a 2-mile radius of the farmers market.	FM Ops data and Geospatial databases	
16. Understand the range of produce sold at the farmers market at the height of the market season.	Focus group discussion with SNAP participants and FM Ops data	

Publication of Study Results

The study’s findings will be presented in reports that will undergo internal review by Westat, in addition to the agency’s 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.