

SUPPORTING STATEMENT A FOR
Study of Organizations Providing or Administering SNAP Incentives at Farmer's Market
(Farmers Market Incentive Provider Study (FMIPS))

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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 collection of information titled the “**Study of Organizations Providing or Administering SNAP Incentives at Farmer’s Market (Farmers Market Incentive Provider Study (FMIPS))**.” The study, planned for FY 2012-2013, affirms the Food, Nutrition and Consumer Services (FNCS) priority for expanding the farm-food connection in Food and Nutrition Service (FNS) programs.²¹ The collection is authorized under paragraph 17(a)(1) of the Food and Nutrition Act of 2008 (7 U.S.C. 2026). With approval from OMB, this collection will be merged with OMB # 0584-0564, Expiration Date: 11/30/2014.

Background

The USDA Food and Nutrition Service (FNS) is taking steps to support access to fresh fruits and vegetables through farmers markets (FM) for individuals participating in programs such as the Supplemental Nutrition Assistance Program (SNAP). To this end, FNS is conducting studies regarding SNAP participation from three perspectives: the markets themselves, SNAP clients who shop at FMs, and organizations supporting incentive programs for SNAP clients shopping at FMs. The *Nutrition Assistance in Farmers Markets: Understanding Current Operations* (Approved under OMB # 0584-0564, Exp. Date: 11/30/2014); “FM Ops”) is

²¹FNCS 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

exploring the supply side of FMs to understand their characteristics and logistics, and the motivation and challenges of accepting SNAP benefits. The second study, the *Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants* (Approval requested under OMB # 0584-0564, Exp. Date: 11/30/2014; also known as Farmers Market Client Survey, FMCS) will evaluate the consumer side of FMs to determine the characteristics of SNAP clients who use and do not use FMs and their reasons why. The *Study of Organizations Providing or Administering SNAP Incentives at Farmer's Market (Farmers Market Incentive Provider Study, FMIPS)* for which this information collection package is being submitted, will assess how private organizations design, operate, and evaluate SNAP financial incentive programs for clients purchasing fruits and vegetables at farmers markets. It will also assist in assessing how much these programs influence the purchase of fruits and vegetables at farmers markets using SNAP benefits. This will be achieved by using information extracted from FNS's Anti-fraud Locator for EBT Redemption Transactions (ALERT) data and linking it with data obtained from participating organizations in the FMIPS study. The ALERT database contains information on every SNAP transaction that occurs via Electronic Benefits Transfer (EBT) at each of the FMs supported by the organizations included in the FMIPS sampling frame. Critical ALERT data of interest include the location, date, and purchase amount of transactions. These will be used to independently and objectively assess the impact of the SNAP incentives on the purchase of fruits and vegetables.

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 purpose of the FMIPS is to gain an understanding of relationships among organizations that are involved with administering the SNAP incentive program in the farmers markets environment, and to gain insight into how these organizations perceive and evaluate the impact that these incentives have on recipients. The beneficiaries of the data collected are USDA's Food and Nutrition Service, organizations that administrator these programs, and the general public.

Study Objectives

The overall objectives of this national study are to:

1. Understand the characteristics of FMs and direct marketing (DM) farmers where use of SNAP is authorized and is not authorized.
2. Understand the relationship of the characteristics to the way the program works for SNAP authorized markets and DM farmers (system of redemptions, volume of redemptions, information available, etc.).
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.

There are two main data collection activities for this study:

- Conduct a telephone interview with each of one to three key staff at selected organizations that provide and/or administer farmers market SNAP incentives. The interview will gather qualitative data to better understand the:
 - relationship of these organizations to the farmers markets that obtain SNAP incentive funds;
 - primary mission of the organizations and their history with SNAP;
 - source of the financial support for the organizations' SNAP incentive programs, and whether other types of support are provided or offered;
 - number of markets a specific organization supported in 2012;
 - selection process and requirements for farmers markets to be awarded incentive dollars;
 - factors that make it difficult to implement and manage incentive programs; and
 - characteristics of successful incentive programs.

The telephone interview will also capture information on whether the organizations maintain and/or collect information on the performance of their program. This self-evaluation data may include information regarding the number of incentives redeemed by markets with a SNAP incentive program, vendor satisfaction with the program, and/or data used for assessing the impact of these programs on farmers market sales and SNAP redemptions at farmers markets.

- Collect and evaluate self-evaluation data of participating organizations. Organizations identified during the telephone interviews as maintaining data on their SNAP incentive programs will be asked to share this data for the purpose of this research study. Self-evaluation data shared by organizations may include, for example, the number of other organizations or farmers markets for which they manage or awarded financial incentives, the volume of SNAP incentive redemptions, the dollar amount of unredeemed incentives, and other information. Shared data will provide the opportunity to help identify differences across incentive programs with respect to performance in 2012.

This study is not intended to be nationally representative and the FMIPS survey is not going to be used to make inferences about a population. The survey is primarily qualitative in nature and thus it is not necessary to develop a statistically rigorous sampling design and frame for the purposes of meeting specific levels of precision or for performing subsequent statistical weighting adjustments. Instead, organizations included in this study will be chosen from a list of private organizations that will be developed based on responses received from farmers responding to the FNS study, *Nutrition Assistance in Farmers Markets: Understanding Current Operations* (FM Ops). To assist in the selection process, the list will categorize the organizations into three groups:

1. Type I: large organizations that provide grant money to other organizations that administer SNAP incentive programs. For example, Type I organizations will include many national non-profit organizations such as a Wholesome Wave and Fair Food Network, both of which are committed to the promotion of food equality.

2. Type II: smaller than Type I organizations, Type II organizations distribute the SNAP financial incentives to farmers markets and administer the SNAP incentive programs in the markets that they support. These might be regional or state-level organizations such as Roots of Change or the Portland Farmers Market.
3. Type III: local organizations that provide money for SNAP incentive programs.

Further stratification of the frame may occur based on whether organizations also provide non-financial support. Non-financial support might include providing information and technical assistance for implementing or managing SNAP incentive programs or providing staff to work at the farmers markets and assist with the management of the programs onsite. A Type III organization could include a local neighborhood organization, a local health department such as the New York City Department of Health and Mental Hygiene, or even health provider organizations such as Blue Cross Blue Shield or Kaiser Permanente.

Use of the Information

Information gathered during the interviews with these types of organizations will provide a better understanding of how the organizations operate, how they are funded, their primary mission, and their relationships with other organizations and farmers markets. Collection of self-evaluation data from these programs will assist in assessing the impact of SNAP incentives on sales at farmers markets. The data will provide a mechanism for assessing whether the provision of incentives actually increases the sale of fruits and vegetables to SNAP clients.

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.

Telephone interviews will be conducted with study participants to collect data for this study. Existing FNS ALERT system data on SNAP redemptions will be used to analyze the impact of the incentive programs on SNAP redemption at FMs.

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 of the literature we identified that some stakeholder organizations have self-published information, but no systematic studies have been conducted in this area.

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

Some of the organizations selected for the study sample will be small businesses or other small entities. At this time, we estimate that approximately 20% of our participating organizations may be small businesses (approximately 20 organizations with 45 respondents). All efforts will be made to minimize burden. As with the other respondents, the information being collected from small business owners will be held to the minimum required for the intended use. Telephone interviews will be scheduled to fit well with each individual's schedule and availability.

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 the data is not collected, USDA/FNS will be unable to improve its understanding of how SNAP incentives impact the sale of healthier foods to SNAP clients in the farmers market setting. It would also preclude understanding how organizations that provide or administer funding for SNAP incentive programs operate, which types of organizational models and relationships may be more successful, and potential challenges or obstacles to the implementation and maintenance of these programs.

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 Code of Federal Regulations 1320.5 for this collection of information. This request fully complies with the regulation 5 CFR 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

A 60-day federal register notice was published on February 16, 2012 in the Federal Register Volume 77, Number 32, pages 9198-9200, and provided a 60-day period for public comments. No relevant comments were received.

The members of the Technical Working Group (TWG) provided guidance on the availability and frequency of collection of self-evaluation data, and also on the data elements to be recorded, disclosed, or reported. Table B.3 in Section B.5 of supporting statement B provides a list of names and contact information of TWG members.

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

The study participants will not receive payment or gifts for their participation in this study. Organizations participating in the study may receive a standard individualized report estimating the number of SNAP clients that actually shop at farmers markets that these

organizations support without using their SNAP incentives, e.g. the number of clients that pay in cash, as well as general attitudes regarding use of SNAP at the markets the organizations support.

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

Participation in the study is voluntary and all responding organizations will be informed of this before beginning the interviews. Responding organizations will also be informed that organizational names and associated data will be maintained throughout the research process. While some of the analyses will report on organizations in aggregate and not include organizational names, other analyses will not maintain the anonymity of the organization. However, personal identifiers of individuals responding on behalf of the organization will be maintained and individuals will be assured that the information they provide will not be published in a form that personally identifies them. Only organizational identifiers may be used in analyses, appear in a resulting report or manuscript, and included in the public use dataset.

At the time of the interview, the interviewer will obtain verbal informed consent and permission to record the conversation. Recordings of the interviews are needed to transcribe the interview for analysis. 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. These recordings will be destroyed subsequent to transcription. All data will be securely stored in locked file cabinets or password-protected computers, and accessible only to Westat project staff.

Westat has extensive experience in data collection efforts requiring strict procedures for maintaining the privacy, security, and integrity of data. These data handling and reporting procedures include requiring all project staff, both permanent and temporary, to sign a confidentiality and nondisclosure agreement (**Attachment 5**). In this agreement, Westat 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 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, pages 17251-17252, discusses the terms of protections that will be provided to respondents.

Institutional Review Board

Westat's 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 included as **Attachment 1**.

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 questions in the telephone interviews are not considered to be sensitive. See **Attachments 2a-2c** for instruments. Participants can choose not to answer any question and participation in the study is voluntary. A pretest of the interview instruments was conducted by telephone with a panel of key informants who are knowledgeable about SNAP incentive programs and not currently working with eligible organizations. Pretest participants were individuals who have worked for eligible organizations in the past. A total of 7 participants were interviewed to ensure pretesting is conducted in line with Office of Management and Budget (OMB) provisions. None of the data captured as part of the pretest will be part of the study data and, again, none of the individuals participating in the pretest were currently working for organizations within the sampling frame.

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 A1 shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection, and for total burden. The length of telephone interview and estimated time for completion depends on the position a respondent holds at the given organization. The estimated time for telephone interviews with those individuals involved in day to day operations is 60 minutes (1 hour) and for those who serve more as an organizational leader is 20 minutes (0.33 hours). Therefore for 110 individuals who are involved in day to day operations (such as Program Managers) participating from Type I and II organizations and 45 individuals from Type III organizations, the telephone interview will take 60 minutes (1 hour) to complete. For 55 participating individuals (the Type I and II organizational leaders), the telephone interview will take 20 minutes (0.33 hours) to complete. It is estimated that the organizational leaders from the 15 organizations that refuse to participate will spend approximately 15 minutes (0.25 hours) on the telephone. We do not anticipate any other people in the organization refusing to participate once the organization's leader has agreed to participate. Further, of the 90 organizations that participate and complete the telephone interviews, 80 will agree to provide SNAP incentive program self-evaluation data. To provide

the data, it will take 120 minutes (2.0 hours) of the organization's time. For the 10 organizations that elect not to share their self-evaluation data, it will take 30 minutes (0.50 hours).

Table A1. Respondent Burden and Cost Estimate

Affected Public	Respondent	Estimated number of respondents	Responses annually per respondent	Total annual responses	Estimated average number of hours per response**	Estimated total annual hours of response burden
Business (for/not-for profit)	Telephone Interviews with Staff at 15 Type I Organizations (Attachment 2A)					
	Leaders Completed	15	1	15	0.33	4.95
	Leaders Non-response	2.5	1	2.5	0.25	0.63
	Staff*	30	1	30	1.00	30.00
	Subtotal Type I	47.5	1	47.5	35.58
	Telephone Interviews with Staff at 40 Type II Organization (Attachment 2B)					
	Leaders Completed	40	1	40	0.33	13.20
	Leaders Non-response	8	1	8	0.25	2.00
	Staff*	80	1	80	1.00	80.00
	Subtotal Type II	128	1	128	95.2
	Telephone Interviews with Staff at 45 Type III Organization (Attachment 2C)					
	Leaders or Staff Completed	45	1	45	1.00	45.00
	Leaders or Staff Non-response	4.5	1	4.5	0.25	1.13
	Subtotal Type III	49.5	1	49.5	46.13
	GRAND TOTAL	225	225	176.9
	Provision of Organizational Self-Evaluation Data Type I, II, and III Organizations					
	Number of Organizations Providing Self-Evaluation Data	80	1	80	2.00	160
	Number of Organizations that Refuse to Provide Self-	10	1	10	0.50	5

	Evaluation Data					
	Total	90	1	90	165

*100% response anticipated for this group.

**Burden is inclusive of advance letters (Attachments 3a, b, c).

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 is \$495,970. This is based on an estimate of 3,059 labor hours, with a salary range of \$67.98 - \$226.22 per hour and includes instrument development, data collection, analysis, reporting, and overhead costs, including computing, copying, supplies, 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 \$513,970 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 request for a new information collection. With approval from OMB, the 90 annual responses and 165 hours will be added to OMB # 0584-0564; Expiration Date: 11/30/2014.

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

The schedule for the study showing beginning and ending dates of collection of information, completion of reports, and publication dates is shown in **Table A2**.

Table A2. Data Collection and Reporting Schedule

Start Interviews: First Weekly Interview Report	Week of November 5, 2012
Complete Interviews: Final Weekly Interview Report	Week of December 3, 2012
First draft of report	December 24, 2012
Draft raw data and analysis files	January 7, 2013
Draft data documentation and code book	January 14, 2013
Final Report—electronic versions (MS Word; PDF) and 25 hard copies	March 23, 2013
Final raw data and analysis files (if needed)	March 25, 2013
Final data documentation and code book (if needed)	March 25, 2013
Data Sets and Documentation for FNS	Week of March 25, 2013
Draft Final Report	Week of April 8, 2013
Public Use Data Sets	Week of April 15, 2013
Final Presentation Materials	Week of May 20, 2013
Final Report	Week of July 1, 2013

Analysis Plan

This section describes the analysis that will be conducted to address the study’s research questions. Planned analysis include: (1) qualitative analysis of the telephone interview data collected from the three types of supporting organizations; (2) descriptive quantitative analysis of the ALERT data and information obtained in the telephone interviews (e.g., the total number of

FMs supported by the organization; the number of FMs supported by the organization that use a point-of-sale system for their SNAP incentive program; and the number of operating days of each of the FMs supported); (3) analysis of self-evaluation data; and (4) social mapping of inter-organizational relationships.

Qualitative Methods for Analyzing Telephone Interview Data

The first consideration in the analysis of qualitative data will be the protection of the confidentiality of interviewees. Participants will be assured that statements and quotes from individuals will not be attributed to a specific individual. Analysis and reporting of the data will also be done in such a way as to remove any overt clues to identify an individual. These procedures will be made clear in the verbal informed consent for interviews as will the fact that interviewees' anonymity cannot be guaranteed.

In the case of organizations, the names of individual organizations will not be used in reports or other presentation of findings, nor will direct quotes be included. Instead, results will be presented in a way to obscure the organizations' identities and as often as possible report results for groups of organizations. In the discussion of specific organizational clusters, the data will be reviewed for confidentiality prior to dissemination beyond Westat staff.

For the analysis itself, findings will first be summarized by organization. The information for all organizations within particular communities will then be analyzed, followed by an analysis of the interrelated sets of organizations across all communities represented in the sample. These data analyses, including reports and intermediate analyses, will be incorporated in an appropriate relational database to provide maximum flexibility for analyses.

The analysis will be conducted to enable the reporting of findings within organizations from multiple interviewees, across organizations within a single community, and across organizations and communities on specific measures. All data transcripts will be coded using a codebook keyed into the data collection instrumentation. Transcripts will be independently coded by two analysts and compared. A minimum 90 percent concordance between both coders will be required before coding is considered final.

Once all data is entered, we will begin the analysis by generating reports for important questions across all data sources within each organization. We can then produce narrative summaries for each question across all organizations by type, e.g., we can summarize the perspectives of directors of all umbrella organizations across communities. A computerized set of matrices will be used to develop narratives addressing specific research questions, such as the advantages and disadvantages of alternative strategies or factors that facilitate or impede the ability of organizations to convert incentives into increased sales of fruits and vegetables.

There are two advantages to this kind of analysis of qualitative data. First, it grounds conclusions in evidence that can be traced and assessed by policymakers, program managers, and other interested parties. Anyone can pull up the analysis database and track the logic underlying the conclusions. The database is also a resource for further research. FNS will be able to replicate analyses or develop new ones as questions emerge. Preservation of all steps in the analysis is an important part of protecting validity, reliability, and scientific integrity of any qualitative data collection.

Analysis of Self-Evaluation Data

Self-evaluation data are likely to be highly variable in format and quantity. All self-evaluation data will first be reviewed for quality and consistency with other information about the organization and the amount of variability. If the data are uniform enough to be coded using a single codebook, they will be coded and analyzed using a matrix methodology similar to that presented above. To do this, the data will be described addressing the following issues:

- What outcome variables were of major interest;
- How was the data compiled by the organization and by whom; and
- Has the data been analyzed by the organization that collected them and how have they been used?

In the process of assessing self-evaluations conducted by organizations we will develop expert opinions on organizational evaluation quality. These reviews will also be incorporated into the database. By comparing evaluations and evaluation results across all organizations and summarizing them, we will be able to advise FNS on what kinds of evaluations are acceptable, feasible and useful to participating organizations and to FNS.

Descriptive Analysis of the ALERT Data

The descriptive analysis will include simple descriptive statistics for each of the characteristics of FM SNAP incentive programs. These will include means, medians, standard

deviations and/or confidence intervals, frequency distributions and cross-tabulations but they are not of primary interest to the study.

Social Mapping of Inter-Organizational Relationships

As part of our analysis of the data captured under the FMIPS, we will build upon the social mapping conducted under Task 1, the Farmers Market Operations Study, (FM Ops), by mapping the relationships between organizations that provide support to FMs, either directly or indirectly. FM Ops will map the relationships between farmers markets and their specific organizations that provide both financial and non-financial support. FMIPS will map the relationships between these organizations as well as identify any additional organizations identified during FMIPS interviews.

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.