

SUPPORTING STATEMENT FOR

“Study of the Food Distribution Program on Indian Reservations (FDPIR)”

Bob Dalrymple, Ph. D., Senior Analyst

Office of Research & Analysis
Food and Nutrition Service, USDA
3101 Park Center Drive, 2016
Alexandria, VA 22302
703-305-2122
Bob.Dalrymple@fns.usda.gov

STUDY OF THE FOOD DISTRIBUTION PROGRAM ON INDIAN RESERVATIONS (FDPIR)

TABLE OF CONTENTS

PART A

A1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY1

A2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED.....2

A3. USE OF AUTOMATED ELECTRONIC, MECHANICAL OR OTHER TECHNOLOGICAL COLLECTION
TECHNIQUES TO REDUCE BURDEN.....8

A4. EFFORTS TO IDENTIFY DUPLICATION.....9

A5. METHODS TO MINIMIZE THE BURDEN ON SMALL BUSINESSES OR OTHER SMALL
ENTITIES.....9

A6. CONSEQUENCES IF DATA ARE NOT COLLECTED.....10

A7. SPECIAL CIRCUMSTANCES.....10

A8. FEDERAL REGISTER NOTICE AND CONSULTATIONS WITH PERSONS OUTSIDE THE
AGENCY.....11

 8A. FEDERAL REGISTER NOTICE.....11

 8B. CONSULTATIONS WITH PERSONS OUTSIDE THE AGENCY.....11

A9. REMUNERATION TO RESPONDENTS..... 12

A10. ASSURANCES OF CONFIDENTIALITY.....13

A11. QUESTIONS OF A SENSITIVE NATURE.....14

A12. ESTIMATES OF THE BURDEN OF THE COLLECTION OF INFORMATION.....15

 12A. ESTIMATE OF RESPONDENT BURDEN HOURS.....15

 12B. TOTAL ANNUAL COST BURDEN TO RESPONDENTS.....16

A13. TOTAL ANNUAL COST BURDEN TO RESPONDENT OR RECORD KEEPERS.....16

A14. ESTIMATE OF ANNUAL COST TO THE GOVERNMENT.....17

A15. REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS.....17

A16. PLANS FOR TABULATION, ANALYSIS, AND PUBLICATION.....17

A17. APPROVAL NOT TO DISPLAY THE OMB EXPIRATION DATE.....22

A18. EXCEPTION TO THE CERTIFICATION STATEMENT.....22

ATTACHMENTS REFERENCED IN PART A

ATTACHMENT A: Research Questions and Data Sources Table

ATTACHMENT B1a: Case Record Review

ATTACHMENT B1b: Case Record Data Review Template

ATTACHMENT B2a: Household Survey

ATTACHMENT B2c: Household Survey Outreach Script

ATTACHMENT B3: Procedures for Conducting Household Surveys

ATTACHMENT B4a: Onsite Official Interview Guide

ATTACHMENT B4b: Site Visit Checklists

ATTACHMENT B4c: Site Visit Planning Call Script (FDPIR Director)

ATTACHMENT B4d: Onsite Official Interview Outreach Script

ATTACHMENT B5a: Discussion Group Guide

ATTACHMENT B5b: Discussion Group Participant Information Questionnaire

ATTACHMENT B5c: Discussion Group Participant Gift Confirmation

ATTACHMENT B5d: Discussion Group Recruitment Flyer

ATTACHMENT B5e: Discussion Group Outreach Script

ATTACHMENT C: NASS Comments and Responses

ATTACHMENT D1: Urban Institute IRB Package

ATTACHMENT D2: NORC IRB Package

ATTACHMENT D3: Staff Confidentiality Pledge

ATTACHMENT E: Burden Table

ATTACHMENT F: Median Hourly Wage Rates by Occupation

ATTACHMENT I4: FDPIR Letter #4 — To Household Survey Respondents from USDA

ATTACHMENT I6: FDPIR Study Informational Brochure

A1. 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 request. This supporting statement provides detailed information on proposed data collection for a national, representative study of the Food Distribution Program on Indian Reservations (FDPIR) and its participants. FDPIR provides USDA Foods to low-income households living on Indian reservations and to American Indians residing in designated areas near reservations or in the State of Oklahoma. FDPIR is administered at the Federal level by the Food and Nutrition Service (FNS) of the U.S. Department of Agriculture, and administered locally by either Indian Tribal Organizations (ITOs) or an agency of a State government. Households participate in FDPIR as an alternative to the Supplemental Nutrition Assistance Program (SNAP). In fiscal year (FY) 2011, FDPIR federal costs totaled \$94 million, including \$57 million for food. ITOs and State agencies also contribute up to a 25 percent match, including in-kind contributions, for the costs of administering FDPIR.

The Urban Institute (UI), in conjunction with NORC¹ at the University of Chicago and Support Services International, Inc. (SSI), has been awarded a contract from FNS to conduct this 3-year study, which began in October 2011. The study's goals are to obtain a demographic profile of participants, explore participation barriers, examine key aspects of program operations, and learn about participants' program experiences. This study is needed to inform FNS decision-making regarding FDPIR program administration and to identify ways to make the program more beneficial to participants. It will provide current information on the characteristics of participants and local program administration across the

¹ NORC was founded in 1941 as the National Opinion Research Center.

nation. Information on perceptions about the program and potential access barriers will also be obtained to identify reasons for declining national participation.

Information on FDPIR administration and participant characteristics is either limited or outdated. At the national level, monthly data is available which tracks the number of participants who received aid from administering agencies; in addition, federal dollars spent on food items issued by administering agencies and related program administration costs are tracked. Information on racial and ethnic data is collected once a year. Though some national data exist, they are not collected or available in a manner that allows detailed examination of the questions FNS needs answered. The primary source of detailed information about programs and participants has been special studies, which do not provide a national level understanding of the program. The Evaluation of the Food Distribution Program on Indian Reservations (Usher 1990), conducted by Research Triangle Institute (RTI) and published by FNS, is the only study to provide nationally representative profiles of FDPIR participants and program characteristics; however, this study was conducted in the late 1980s. Since then, significant changes have occurred in FDPIR, including changes to eligibility rules, foods offered, and food delivery options. To understand how the program changes, along with external factors, have affected program administration and client participation, a new, nationally representative study is necessary to allow FNS to best meet the food and nutrition needs of eligible households.

A2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The study's objectives include:

- Obtaining an updated demographic profile of participants,
- Exploring reasons for the overall decline in FDPIR participation,
- Examining food package distribution approaches and other key aspects of FDPIR operations,

- Learning about FDPIR's contribution to participants' food supply, and
- Learning about participant satisfaction with the program.

Data collection activities will include case record reviews, a household survey, and site visits. Site visits will consist of staff interviews, discussion groups with participants and low-income non-participants, and tours of FDPIR facilities. To make the study as representative a possible, ITOs or State agencies in different regions and with varying levels of program participation will be asked to participate. A nationally representative sample of 1,040 participating households in 25 FDPIR programs will be selected for case record reviews and the survey. Program visits will be conducted, including staff interviews and discussion groups, in 17 of the 25 programs.

Proposed primary data collection, for which OMB approval is sought, includes three components, detailed below, all of which will be conducted in Tribal areas. Attachment A displays the range of data collection procedures, respondents, and the core research objectives addressed by each.

Case Record Reviews

Information to be collected. The purpose of the case record review is to obtain information that will describe current program participants and their characteristics, including demographics, household composition, participation in SNAP, earned and unearned income (amount and sources), and other available sources of public benefits. The data elements to be extracted are noted in Attachment B1a. The information for the case record review is based on the mandatory elements for a case record as defined by the FNS Regulations 7 CFR Parts 253 and 254 and FNS Handbook 501 for the Food Distribution Program on Indian Reservations (FDPIR):

<http://www.fns.usda.gov/fdd/programs/fdpi/501Handbk.htm>. Case record reviews will be conducted for the 25 sampled Tribes/ITOs. About 30 records will be abstracted for each site, with about 68 for the two largest sites.

From whom the information will be collected. Information pertaining to a sample of 1,040 participating households across 25 Tribes/ITOs will be abstracted from case records that are maintained

on file at FDPIR program offices. Details about the selection of the sample are included in Supporting Statement Part B, response 1b.

How the information will be collected. For most sites, the case record review will involve abstracting information onsite from eligibility forms that are completed by applicants to FDPIR. At the USDA-Tribal Leader consultations with the Tribes in the study sample, we learned that very few Tribes maintain electronic records that would be amenable to electronic data transfer. Tribes/ITOs will draw the sample in advance (based on specifications provided by the study team). Research staff trained in data abstraction procedures will conduct the case record review. They will conduct onsite visits to abstract the data in FDPIR offices, using the case record review template provided in Attachment B1b. These data will be entered into a secure database for aggregation and analysis.

For those sites that maintain electronic data files (to-date, we are aware of only one such site in the sample), research staff will consult with the Tribe to establish a data format and a secure method of data transfer, which may include shipping encrypted data on an external hard drive or uploading it to a secure file transfer program (FTP) link.

For very small sites, the research team will offer FDPIR programs the option of copying and transmitting redacted copies of case records through a secure and traceable carrier. Research staff will then abstract the data from these records to obtain the necessary data elements. Based on the consultations, we expect that few Tribes will select this option.

Survey of Participants

Information to be collected. The household survey (Attachment B2a) will address research objectives related to program participation. The survey will capture information that describes the extent of participation in other nutrition assistance programs, access to food stores, access to facilities for storing and preparing food, perspectives on FDPIR customer service, and reasons for FDPIR participation and for switching between FDPIR and SNAP. The survey questions will focus on information and perceptions that cannot be obtained from case records. Although certain information about household members

(relationship to head of household, age or date of birth, type of income sources) is available in the case record, the survey will verify this information and obtain additional demographic information.

From whom the information will be collected. A sample of 1,040 current FDPIR households, selected from 25 FDPIR programs, will be approached to participate in the survey—the same sample whose case records will be reviewed.

How the information will be collected. A Paper and Pencil Instrument (PAPI) will be used for telephone and in-person survey administration with FDPIR participants. The survey is estimated to take 40 minutes. Efforts will first be made to conduct the interview by telephone. If this is not successful, the Field Interviewer will conduct an in-person interview. Respondent tracking efforts will be conducted as needed, using information derived from the case records. More information on this process can be found in Attachment B3.

- *Telephone surveys.* All sampled respondents will receive an advance letter (Attachment I4) describing the study and including a brochure about the survey (Attachment I6) and a toll-free number for contacting the Field Interviewer if there are any questions. Interviewers will attempt to contact respondents by telephone and record each attempt. After three contact attempts, the Field Interviewers will shift to more intensive, in-person locating efforts for hard-to-reach cases (see Attachment B2c for household survey outreach script).
- *In-person surveys.* If the respondent prefers to meet in-person, the Field Interviewer will travel to the site and conduct the survey in the respondent's home or in a designated, private office space (i.e., designated office space identified by the Tribe). In-person surveys may be pre-arranged or may occur on an *ad hoc* basis on food distribution days. The Field Interviewer will be on-site at least once a month in order to become known to the community and to be available should any sampled respondent indicate a willingness to participate in the survey and wishes to schedule or proceed with the interview.

Program Site Visits

Information to be collected. Site visits will address research objectives related to program operations by examining FDPIR implementation and identifying variations in FDPIR practices across reservations, regions, and states, based on a purposive sample. Site visits will include interviews with program administrators and staff, other service providers, and Tribal leaders; visits to FDPIR programs to observe facilities related to client enrollment, warehouses, and food distribution; and discussion groups with program participants and eligible non-participants. Fieldwork will examine: outreach to the target population, program eligibility and enrollment procedures, ordering and selecting foods, food storage and distribution, nutrition education and health promotion, communication between FDPIR and SNAP offices, availability and access to SNAP and other food assistance and social service programs, program participation levels and client satisfaction, and staff recommendations for improving access to healthy foods and traditional foods. The discussion groups with current FDPIR participants and low-income non-participants will focus on food access, reasons for participating in FDPIR or other food support programs, and program satisfaction. The data collection materials for onsite interviews are presented in Attachments B4a –B4d. The onsite discussion group guide, participant questionnaire, and gift confirmation form are provided in Attachments B5a-B5c.

From whom the information will be collected. During visits to 17 program sites, interviews will be conducted with FDPIR program managers and staff, including warehouse managers and/or food ordering staff, and nutrition education staff. Site visits also will include interviews with Tribal officials and managers of other service programs operating in the area. Discussion groups will be held with current FDPIR participants and low-income non-participants.

How the information will be collected. Interviews will be pre-arranged and conducted with FDPIR program staff, Tribal officials, and managers of other service programs during the site visit. FDPIR directors/managers will be contacted to plan the site visit (Attachment B4c). Research staff will determine the relevant people to interview at each site during preliminary discussions with FDPIR

program directors/managers and then outreach calls will be made to those individuals (Attachment B4d). The questionnaire is segmented by topics to permit flexibility and adjustment to match the FDPIR program design in each sampled Tribe. On average, interviews will be designed to last no more than one hour.

Site visits will include observations, by FNS contract staff, of program facilities and activities, including client enrollment and re-enrollment procedures, warehouse facilities and operations, distribution sites and operations, and any nutrition education activities that take place during the site visit. FNS contract staff will use the Site Visit Checklists included as Attachment B4b.

A total of 19 discussion groups are planned, with 12 current FDPIR participants and low-income non-participants in each group. The discussion group guide is included in Attachment B5a. Discussion group participants will be recruited by FDPIR and other Tribal program staff as determined through Tribal consultations and the outreach process (Attachments B5d and B5e). Discussion groups will be arranged at times and locations to accommodate the needs of participants. The groups may be arranged to coincide with activities at which a number of people are expected to congregate (e.g., a nutrition education program). Field researchers will ensure that program staff is not present during the groups. Two researchers will lead each discussion group, which will last no more than two hours.

Frequency of data collection.

For each of the 25 selected sites, data from case records and the participant survey will be collected one time. This will be followed by site visits to 17 of the 25 program sites that will incorporate interviews, program observations, and discussion groups, each of which will occur a single time.

How this information will be used.

The information will be included in a research report that will be used to inform Congress and federal policymakers, as well as Tribal leaders, about FDPIR program operations and participants in order to improve program management and policy. Findings related to factors affecting program participation

will help policymakers and program administrators identify any barriers to program enrollment among qualifying households.

Sharing of information with other organizations.

FNS will share the results with representatives of the Tribes included in the study and the general public.

A3. 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.

The methods for conducting the FDPIR participant survey and for collecting case record data from ITOs both provide an option for conducting data collection remotely through telephone and electronic data transfer, respectively. In both instances remote data collection will be the preferred method and will reduce the burden on participating ITOs and FDPIR participants.

Case record data. The majority of the ITOs do not have automated case record files that can be transferred electronically and will require a site visit, though electronic transfer is the preferred method of data collection because it will reduce burden on FDPIR staff to pull the case records and host a researcher to conduct onsite data abstraction. When electronic transfer is possible, research staff will consult with each ITO to establish a secure method of data transfer, which may include shipping encrypted data on an external hard drive or uploading it to a secure FTP link. Data files can be delivered in ASCII, SAS, STATA, SPSS, or MS Excel format.

Participant Surveys. The majority of survey interviews are planned to be administered by telephone, though it is anticipated that some respondents will prefer an in-person interview. All sampled

respondents will receive an advance letter (Attachment I4) describing the study and including a toll-free number to contact the Field Interviewer assigned to their program for answers to any questions. Each Field Interviewer is provided with a dedicated toll-free number to accept calls from respondents. This allows respondents to reach the Field Interviewer directly from his or her own home or cell phone. Telephone interviews may occur at the time of the call or be scheduled for a later date at the respondent's convenience.

A4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

The current effort does not duplicate existing information. There has not been a systematic, national study of the program since the one that was completed in 1990. Studies that have been conducted since then have focused on particular Tribal-FDPIR programs. For example, in 2009, Finegold and co-authors completed a study comparing the Food Distribution Program on Indian Reservations (FDPIR) and the Supplemental Nutrition Assistance (SNAP), and in 2002 Rita Hiwalker and co-authors published "The Relationship of Food Assistance Program Participation to Nutritional and Health Status, Diabetes Risk and Food Security Among the Northern Cheyenne." While such studies shed light on individual programs, they do not provide the updated information and understanding that a national study can offer.

A5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

There are no small businesses that will be asked to participate in this study; however, many Tribal governments would be considered small entities because the populations in their jurisdictions are smaller than 50,000. 2010 Decennial Census population counts of American Indians or Alaska Natives alone or in

combination with other races were used to estimate the number of small entities. For the Tribal areas included in the service areas of the 25 tribes in the study sample, all but three of the Tribal areas (Creek Oklahoma Tribal Statistical Area (OTSA), Cherokee OTSA, and Navajo Nation Reservation and off-reservation trust land) have populations of under 50,000. Several steps have been taken to minimize burden on such entities: 1) data collection is one-time only; 2) where possible, information will be collected from FNS administrative records and other secondary sources such as the Census; 3) data collection procedures involve opportunities to establish times for the interviews or survey administration that are most convenient for the respondents; and 4) questions pertain only to essential information that cannot be obtained from secondary data sources. Finally, the time required to complete interviews is brief, averaging no more than one hour. The data collection is, therefore, not considered to have a significant economic impact on such entities.

A6. 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.

This study will provide current information on the characteristics of participants and local program administration across the nation, without which FNS will not be able to assess, with up-to-date national level data, how the program operations and management might be improved. Information on perceptions about the program and potential access barriers also will be obtained in order to identify reasons for declining national participation. This information is critical to FNS' ongoing assessment of the FDPIR program, and for identifying appropriate future measures that can be put in place to enhance this program.

A7. 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 that require deviation from these guidelines.

A8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

8a. Federal Register Notice. A 60-day public comment notice was published in the Federal Register on May 14, 2012, at 77 FR 28351, and no public comments were received in response to this notice.

8b. Consultations with Persons Outside the Agency

Researchers have spoken with staff of six regional FDPIR offices to gather information on data available in case files and methods of case file data collection across Tribal-FDPIR programs. This information has been used to develop data extraction approaches and to estimate the burden associated with case-file data extraction. Two formal Tribal consultations with Tribal leaders and FNS were held via webinar (January 18 and January 26, 2012) and attended by members of the research team. Additionally, in November and December 2012, FNS held three in-person consultations for those Tribes invited to participate in the study sample. These consultations were held in Rapid City, SD, Oklahoma City, OK, and San Francisco, CA, and included presentations by the study team. A fourth webinar consultation was held on January 10, 2013. At the consultations, Tribal leaders and their representatives offered suggestions as to key issues to address, outreach methods, and data collection approaches. The research team pretested data collection instruments from October 30 through December 17, 2012 to assess burden, clarity of questions, and clarity of instructions. The following Tribes participated in the pretest: Red Cliff Reservation, WI; Bois Forte Reservation, MN; Ho-Chunk Nation, WI.

The information has been reviewed by Christy Meyer (202-720-2555) of the Methods Branch of USDA's National Agricultural Statistics Service (NASS), with special reference to the statistical procedures. See the NASS comments and the research team's response in Attachment C.

A9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Each survey respondent and discussion group participant will receive cash, a gas voucher, or a store or VISA gift card valued at \$25 as a token of our appreciation. Based on past experience, the desired form of gift varies by Tribe and is often determined by practical matters, such as the feasibility of using a gas voucher or gift card based on the proximity of gas stations and stores. The research team will consult with each ITO to determine the most appropriate gift (e.g., cash, gas voucher, store or VISA gift card). Field Interviewers will provide the gift to the respondent at the end of the in-person survey and will mail the gift to respondents who participate by telephone. Discussion group participants will receive the gift at the end of the session, or upon their departure if they choose not to participate after listening to the introductory script.

Each participating ITO will receive a nominal payment of \$100 to defray operational costs associated with providing case records or automated data, helping organize discussion groups, making space available for interviewing, and otherwise accommodating the study. The payment will be sent with the guidance that the funds cannot be directly applied to FDPIR, but can be applied to a general fund and used to match federal funds.

A10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

UI maintains an Institutional Review Board (IRB), as does NORC, to ensure that research practices and procedures effectively protect the rights and welfare of human subjects, consistent with the requirements set forth in Title 45, Part 46 of the *Code of Federal Regulations* (45 CFR 46). The Urban Institute's IRB application and approval for the pretest are included as Attachment D1 (a second application will be submitted for the full data collection submitted for OMB approval). A copy of NORC's IRB application and approval is included in Attachment D2.

In accordance with these requirements, survey respondents, interview respondents, and discussion group participants will be informed about the purpose of the data collection, its sponsorship, the voluntary

nature of participation, and the privacy of responses. Accordingly, reports produced by UI for FNS may name organizations that participated in the data collection effort but will not link individual respondents with particular information collected. Through outreach activities to programs in the study sample, researchers will learn of any Tribal IRBs that may include additional requirements, such as obtaining signed written consent forms from participants. Such requirements will be determined by each participating Tribe and approved by UI's IRB.

Within UI and its subcontractor organizations, information identifying particular respondents will only be shared with staff who have signed *Staff Confidentiality Pledges* (Attachment D3) and who need the information for research purposes. Hard-copy materials containing respondent identifying information will be locked up when not in use, and electronic materials with identifying information will be stored on a secure server in password-protected and/or encrypted files, where appropriate.

Additionally, a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991 (56 FR 19078) discusses the terms of protections that will be provided to respondents. Participants in this study will be subject to 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.

A11. 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 to be asked of FDPIR administrators, ITOs, Tribal officials, Tribal leaders, or other stakeholders are not considered personally sensitive. They do not ask about sexual behavior or attitudes, religious beliefs, or other matters that are commonly considered private. Respondents will be informed that participation is voluntary and that they can decline to answer any question without consequence.

Survey respondents and discussion group participants will be asked questions about personal circumstances, such as family composition, household income, health related issues and illnesses, and health insurance, but will not be asked other questions commonly considered private. Interviewers will explain that household composition and income are important for describing FDPIR participants and considering how to best serve them. Interviewers will also explain that FDPIR is concerned about providing foods that are compatible with the nutrition and health needs of the eligible population and, for that reason, health issues related to dietary restrictions or requirements are relevant. FDPIR is interested in promoting nutrition education, and questions about health insurance indicate sources of care which are important opportunities for coordination of nutrition education for FDPIR participants. Data collection instruments will include reminders about our assurance of privacy, that participation is voluntary, and that respondents can decline to answer any question without consequence. Discussion group participants will introduce themselves using first names only and will be asked not to repeat anything heard in the group to anyone else. Outreach to Tribes will provide assurance that research approaches are tailored to concerns about sensitive questions and privacy.

A12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A) 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 13 of OMB Form 83-I.

B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

12a. Estimate of respondent burden hours

Respondents include FDPIR managers and administrative staff, FDPIR participants, low-income FDPIR non-participants, Tribal leaders, and other service providers that work or coordinate with FDPIR programs. The total number of respondents is estimated to be 1,554, including 1,270 respondents and 284 who are contacted but do not respond.

- Case record reviews require FDPIR staff to pull case records selected for the sample and subsequently return them to the appropriate file. One staff person at each site will be responsible for this task, for a total of 25 respondents.
- The total estimated sample for the survey is 1,040. The total estimated number of respondents to the survey is 832 (80 percent response rate).
- The total estimated sample for the on-site staff interviews is 170. A 100 percent response rate is anticipated for the staff interviews.
- The total estimated sample for the discussion groups is 304. The total estimated number of discussion group participants is 228 (75 percent response rate).

Attachment E provides a detailed table of the burden estimate. The times estimated in Attachment E are based on previous studies conducted by UI, using similar methods; NORC's extensive household and telephone survey experience; information gathered on case file content from calls with regional FDPIR program staff; and pretesting of the case record review, the participant survey instrument, the site visit interview guides, and discussion group guide. See Supporting Statement Part B, Question 4 for a detailed explanation of the pretesting.

12b. Total annual cost burden to respondents

The median hourly wages of selected occupations (classified by Standard Occupational Classification codes) were compared using Occupational Employment Statistics from the U.S. Department of Labor's Bureau of Labor Statistics. Potentially relevant occupations and their median hourly wages can be seen in Attachment F. The average wage rate for the first two occupations in the table, used to estimate costs for household survey and discussion group participants, is \$12.25 per hour. For all other respondents, the

estimates use an average of the remaining six occupations listed, or \$27.28. Based on these assumptions, the *estimated total respondent cost* is \$21,841.58, as follows:

$$1,219.8 \times \$ 12.25 = \$14,942.92$$

$$247.8 \times \$27.28 = \$6,759.53$$

A13. 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 questions 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital costs, start-up or ongoing operation, or maintenance costs associated with this data collection effort.

A14. Provide estimates of annualized cost to the Federal government. 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.

The 36 month contract cost to the federal government for the implementation, data coding, preparation of raw data files, and analyses for this study is fixed price at \$ 2,271, 851. The annualized contract cost is \$757,284 (\$2,271,851/3). This information collection also assumes a total of 800 hours of federal employee time for a GS-14, step 10 Senior Analyst at \$65.53 per hour, for a total of \$52,424 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2012. The total annualized cost (contract + FNS cost) is \$809,708.

A15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This submission is a new information collection request as a result of program changes and will add 1,468 hours of burden to OMB's inventory.

A16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Data collection will commence upon approval. The schedule shown in Table A-1 lists the expected period of performance for the data collection and reporting. FNS will publish the final report and post it on its website, as well as share findings during stakeholder meetings. Tribes and ITOs will be able to share and disseminate the report as well.

Table A-1 Anticipated Schedule for Data Collection and Reporting

Participant case record review, participant survey, other onsite data collection activities	August 2013 – November 2013
Draft Final Report	First Draft: May 2014 Second Draft: July 2014
Final report	September 2014
Briefing	September 2014

Analysis and reporting will combine data from many different sources of data, both primary and secondary. Sources and analytical approaches will vary depending up the questions addressed. The following is an overview of the analysis plan² for each of the 5 research topics:

- A demographic profile of current FDPIR participants
- FDPIR’s contribution to participants’ food supply
- The extent to which FDPIR participants switch between FDPIR and SNAP and the reasons for doing so
- Reasons why fewer individuals in the nation are participating in FDPIR
- Key aspects of FDPIR operations

² A detailed analysis plan was submitted to FNS on April 10, 2012

A demographic profile of current FDPIR participants. The study will produce a picture of current program participants' characteristics based on data from case record reviews and the survey. It will include aggregated descriptive statistics at the national level for the following categories: demographic characteristics; economic characteristics; economic need and program eligibility and participation; access to FDPIR; and access to other food resources. This updated, nationally representative data will be estimated from the share of the current FDPIR participants that responds affirmatively to the characteristics of interest (e.g., presence of elderly in the household, marital status, family structure, educational attainment, labor market participation, earnings, health insurance coverage, other nutrition program participation, etc.). Much of the information needed to create the demographic profile will be included in the participant case files; other data will come from the participant survey. These characteristics will be reported for the nationally-representative sample of FDPIR participants and for subgroups, where feasible given sample size limitations.

FDPIR's contribution to participants' food supply. Descriptive analyses of survey data collected from the sample of current FDPIR participants as well as information gathered from Tribal staff about the availability of other nutrition assistance programs in their area will be used to address the research questions pertaining to this issue. The analyses will assess participants' use of other nutrition assistance programs and other sources of food. Using participants' responses to questions about where the foods they typically eat come from, and the number of meals that come from those foods, the analysis will include an estimate of the proportion of their diet that comes from FDPIR foods.

The extent to which FDPIR participants switch between FDPIR and SNAP and the reasons for doing so. Current FDPIR participants' case record data and responses to survey questions about their prior year's use of FDPIR and SNAP will be used to answer these research questions. These data will identify switchers and the characteristics, income, location, distance from the closest supermarkets, size of the SNAP benefit, season, employment status associated with switching, and how long participants are on FDPIR during the year and if the length of time on FDPIR has changed over the years. Descriptive methods will be used to assess the size of the population that switches between programs, and the

characteristics of these SNAP and FDPIR participants. Multivariate regression models will also be used. For example, analysis may use logistic regression models, where the outcomes of interest are “ever switched from SNAP to FDPIR in the last year,” and “ever switched from FDPIR to SNAP in the last year.” Each variable would be regressed on the characteristics of interest (e.g., household demographics, program eligibility, benefit size) to estimate the magnitude of the statistical association between a given characteristic and the probability of switching to and from FDPIR and SNAP. Results from these models will provide estimates of the association between household circumstances and likelihood of switching programs to help policymakers better understand why Tribal populations switch between SNAP and FDPIR.

Reasons why fewer individuals are participating in FDPIR. The study will explore a number of possible reasons why fewer individuals are participating in FDPIR in recent years.

Factors that might affect the number of individuals who are eligible for FDPIR. TRIM3, a microsimulation model operated by UI, will be used to assess how changes in FDPIR policy, changes in household composition and characteristics, and economic factors might affect eligibility. The analysis will use the Annual Social and Economic Supplement (ASEC) of the Current Population Survey (CPS-ASEC) data for CY 2001 and CY 2008 as a secondary data source.

Changes in participant preferences for SNAP over FDPIR. Two approaches will be used to address this question. Simulated SNAP benefit data from TRIM3 and assumptions based on the latest valuations for FDPIR benefits will be used to draw comparisons over time between SNAP and FDPIR benefits, using CPS-ASEC data for CY 2001 and CY 2008. Data from the survey and group discussions will be used to consider changes in participant preferences for SNAP over FDPIR in order to gain insight into reasons fewer individuals are participating in the FDPIR program. Survey data will be analyzed to produce descriptive statistics on key reasons people choose to enroll in, or leave, the FDPIR program. In addition to national-level analysis, all data will be examined for regional differences, although sample size may limit the extent of this analysis. Some of the factors, such as eligibility requirements and

demographic changes, will be analyzed using other data sources as well as survey and discussion group data. A table will be produced to capture preferences for SNAP and for FDPIR.

Group discussions will provide nuanced information on factors affecting people's choices regarding food access and food support programs. These data will be in text form. Analysts will identify topics and themes in the detailed discussion group notes and prepare shorthand text to include in a table. This approach will help identify cross-site and regional comparisons and provide a quick overview of key points from each discussion group. Analysts will return to the actual discussion group notes to provide detail on each topic in the research report. A table will be produced to capture preferences for SNAP and for FDPIR.

Use of FDPIR and demographic changes in subgroups. Both primary and secondary data will be used to assess whether FDPIR is used more by any particular subgroup in the population that has been declining. The 2000 and 2010 Census and ACS 2005-09 will be used to conduct analyses of all the Tribal areas in the US, as well as those in which FDPIR has been located over the past decade, to determine which groups have experienced population declines. These findings will be compared to the characteristics and trends that the survey and case files associate with FDPIR participants. While causal inferences cannot be made from this analysis, results may help posit hypotheses for future testing.

Reasons for leaving FDPIR and barriers to participation. Survey and discussion group data will be used to identify barriers to participation in FDPIR and SNAP, focusing particularly on program features and policies. The analytic approach for the survey and discussion group data will be similar to that described above in addressing program preferences. Findings from survey data will be complemented with the more nuanced information collected during discussion groups exploring program barriers and their role in discouraging program participation.

Economic factors affecting participation. Descriptive analyses of survey data and case file reviews as well as discussion group data will be conducted to describe participants' views on the extent to which employment status, earnings (including seasonal employment earnings, per capita payments, and public assistance), and food prices influence their decision to enroll in FDPIR. Quantitative analysis will

incorporate metrics collected through the participant survey and case file reviews, including unemployment and changes in employment status over time and whether these circumstances affect the decision to participate in FDPIR. Consumer Price Index data from USDA ERS between 2003 and 2012 will be used to supplement this analysis. The CPI for food at home is a component of the full CPI and is the principal indicator of change in retail food prices. Data are readily available for the years 2003 through 2012.

Availability and cost of food outside of FDPIR. The types of food retailers in close proximity to Tribal areas (e.g., convenience stores, large grocery stores, etc.) will be assessed to determine whether primarily high or low cost foods are available, as a proxy for the retail price of FDPIR foods. While not definitive, this analysis will help to understand if FDPIR may be the only low-cost food option in some Tribal area. This analysis will draw on the Census County Business Patterns and the USDA's Food Desert Locator, both secondary data sources.

Key aspects of FDPIR operations. Research objectives related to program operations will be addressed through analysis of qualitative data collected during site visits, supplemented by program administrative data, such as information pertaining to nutrition education grants. In addition to documenting the range of program operations, qualitative analysis will be used to explore the relationship between program features and operating practices and FDPIR participation. Research team members will produce site visit summaries that address each of the objectives, which will be used in the cross-site analysis to identify themes across sites. Research team discussions based on review of the site reports will be a key component of this cross-site analysis and will be used to develop table shells that summarize findings.

A17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date for OMB approval of the information collection will be displayed on all instruments and correspondence with prospective respondents.

A18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement identified in Item 19 of the OMB 83-I "Certification for Paperwork Reduction Act."