

**Supporting Statement for the
Evaluation of Demonstrations
of NSLP/SBP Direct
Certification of Children
Receiving Medicaid Benefits**

Part A

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PART A: JUSTIFICATION

A.1. Explanation of Circumstances That Make Collection of Data Necessary

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 National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are the cornerstones of the government's efforts to provide nutritious meals to school children. All children enrolled in schools participating in the school meal programs are eligible to receive school meals. Although the U.S. Department of Agriculture (USDA) subsidizes all school meals that meet program requirements, the subsidies are much larger for meals provided to children certified for free or reduced-price meals. Historically, most students have become certified for free or reduced-price meals through an application process. In recent years, however, more students have been automatically determined eligible for free meals through direct certification. Direct certification is conducted by matching school enrollment records with public assistance program records. Students can be directly certified if their families participate in certain public assistance programs such as the Supplemental Nutrition Assistance Program (SNAP); these families do not need to complete an application.

Section 104 of the Child Nutrition and WIC Reauthorization Act of 2004 (P. L. 108-265) amended section 9(b) of the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1758(b)) to require all local educational agencies

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(LEAs)¹ that participate in the NSLP and/or SBP to establish, by school year 2008–2009, a system to directly certify as eligible for free school meals children who are members of households receiving assistance under SNAP. Section 103 of Public Law 111–296, the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), amended the NSLA to authorize the USDA’s Food and Nutrition Service (FNS) to conduct and evaluate multiyear demonstration projects beginning in July 2012 in selected States and school districts to test the effectiveness of direct certification using Medicaid eligibility and income data in determining eligibility for free school meals. HHFKA also authorized the evaluation to access data for the purposes of conducting demonstration projects, program monitoring, evaluations, and performance measurements of States and school districts participating in the Child Nutrition Programs and mandates the cooperation of relevant State agencies.

In response to this Federal mandate, FNS seeks approval to conduct data collection as part of the Evaluation of Demonstrations of NSLP/SBP Direct Certification of Children Receiving Medicaid Benefits. FNS has contracted with Mathematica Policy Research to conduct this evaluation.

The overall aim of this evaluation is to estimate the effect of direct certification using Medicaid (DC-M) on meal program access, costs, and participation. Although the process of matching student enrollment records to Medicaid data will likely increase direct certification costs for States and some school districts, DC-M can generate cost savings for districts if it leads fewer families to submit applications for school meals. DC-M will also have an

¹ Because nearly all schools in the NSLP/SBP are parts of entities commonly known as school districts, we use that term throughout this document instead of LEA to refer to local entities that enter into agreements with State agencies to operate the NSLP and SBP.

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impact on Federal costs if it leads to an increase in students certified for free meals and therefore, an increase in Federal funds to school districts to cover the meals of the additional certified students. We will examine the effects of DC-M on these and other outcomes. In some school districts, meal reimbursement rates are established through means other than an annual student certification process, such as using a socioeconomic survey (SES) of households to create claiming percentages for school meals. We also will compare costs of DC-M with costs to be expected if school districts use socioeconomic surveys (SEs) to establish Federal reimbursement rates.

FNS has selected five States—Florida, Illinois, Kentucky, New York, and Pennsylvania—to participate in the DC-M demonstrations beginning in SY 2012-2013.² Additional States will be selected for SY 2013-2014.³ DC-M will occur in selected school districts within some of the demonstration States (DC-M1 States) and will be implemented statewide in other States (DC-M2 States). Of the five States participating in SY 2012-2013, three (Florida, Illinois, and New York) were selected to conduct DC-M in only a subset of school districts (these are called DC-M1 States), and the other two (Kentucky and Pennsylvania) will conduct DC-M in all school districts statewide (called DC-M2 States). DC-M will be randomly assigned to school districts in the DC-M1 States, enabling a rigorous impact analysis in those States.⁴

² A sixth State, Alaska, was initially selected but later withdrew from the demonstration.

³ Although the additional SY 2013-2014 states have not yet been selected, for burden estimates, we are assuming that four additional states will be included.

⁴ In New York, only New York City is participating in the demonstration. The 32 community districts in the city will be randomly assigned to demonstration and control groups.

A.2. How the Information Will Be Used, By Whom, and For What Purpose

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.

This is a new information collection request. The DC-M study includes a Participation and Cost Evaluation and a Match Validation Substudy (MVS). Additionally, the DC-M study will be informed by an Access Evaluation that is described within this ICR to provide insight into the overall study. However, burden for the Access Evaluation is not included within this ICR. The Access Evaluation will identify the potential impact of DC-M on children's access to free NSLP and SBP meals based on a retrospective match of administrative records. The Participation and Cost Evaluation will estimate the effect of DC-M on program cost and participation for each of 2 school years, SY 2012-2013 and SY 2013-2014, and will explore the challenges experienced during these two years of the demonstration. The data collected for the Participation and Cost evaluation will also be used to examine the conditions that would make the use of a SES to establish Federal reimbursement rates a cost-effective alternative to standard certification procedures (with or without DC-M). The Match Validation Substudy (MVS) will use varying levels of match stringency to independently validate matches made in selected demonstration school districts. The data collection required is described in a Memorandum of Understanding (MOU) (Appendix M) that will be signed by Mathematica and each State when it joins the demonstration. Table A.2.1

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shows the various State- and school district-level data collection efforts. Both DC-M1 and DC-M2 States will be included in all data collection activities.

Table A.2.1. Data Collection Activities

Type of Data Collection	State-Level Data Collection		School District-Level Data Collection	
	SY 2012-2013	SY 2013-2014	SY 2012-2013	SY 2013-2014
Access Evaluation ^a	X		X	
Participation and Cost Evaluation				
Challenge Interviews	X	X		X
Cost Data Collection	X	X	X ^b	X
Match Validation Substudy		X		X

^a Retrospective administrative data about SY 2011-2012 enrollment collected from 3 state agencies and 6 school districts in summer/fall 2012

^b Retrospective data about SY 2012-2013 costs collected in summer 2013

1. Access Evaluation

The Access Evaluation will provide a preliminary assessment of the outcomes of matching students to Medicaid data and of using income data in the Medicaid files to determine eligibility for free NSLP/SBP meals. (Note: We are not requesting clearance for the Access Evaluation. The Access Evaluation involved fewer than ten individuals and will be completed before this request is submitted to OMB. We mention the Access Evaluation here only for completeness, as the resulting analysis will inform components of this study.)

Medicaid data was requested from each Year 1 demonstration State's Medicaid agency (five in total). Student enrollment data will be obtained from nine individuals within the five States, some at the State level and others at the school district level. Illinois and Kentucky will provide statewide student enrollment data, and the New York City Department of Education will

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provide student enrollment data for all community districts in the city. In Florida and Pennsylvania, we requested student enrollment data from a total of six school districts (three in each state). Using this data, we will conduct a retrospective match of student enrollment records against Medicaid data to simulate DC-M in SY 2011–2012. We will measure potential impacts of DC-M by comparing the number of certifications identified through the simulation with school districts' actual certifications in SY 2011–2012.

2. Participation and Cost Evaluation

Data collected as a part of the Participation and Cost Evaluation will be used to measure the impact of DC-M on participation and costs observed over two years of demonstrations. This component of the study will examine whether DC-M leads to changes in the number and distribution of certified students, as well as patterns of participation in the school meals programs. It will also examine whether DC-M leads to higher or lower certification costs and meal costs. The results of this analysis will be used to develop national projections of the impact of DC-M on costs.⁵ Finally, the Participation and Cost Evaluation will identify the challenges that States and school districts face when implementing DC-M. We will also develop estimates for FNS's Special Milk Program (SMP) and the NSLP Afterschool Snack Program (ASP), both of which are directly affected by changes in NSLP/SBP certification.

We will collect four key types of data:

(1) Administrative data on participation and certification (Appendix A);

⁵ We recognize the limitations of basing national projections on a small non-representative sample of states and districts. The reports from the study will describe the approach to sampling and acknowledge this and other relevant limitations.

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(2) State-level cost data (tracking logs presented in Appendix B; State cost interview protocols presented in Appendix C; State cost survey correspondence presented in Appendix D);

(3) School district-level cost data (presented in Appendix F; district cost survey correspondence presented in Appendix E and G); and

(4) Data on DC-M challenges (protocols presented in Appendix H; correspondence related to the interviews presented in Appendix I).

We discuss each type below.

a. Administrative Data on Participation and Certification

We will collect administrative data from State Child Nutrition Directors on certification and meal participation for each school district in either the demonstration or control group in a DC-M1 State and for each sampled school district in a DC-M2 State. Administrative data will include information on certification (number of students by category—i.e. free, reduced-price, or paid), as well as on participation (number of meals served by category) in the NSLP, SBP, ASP, and SMP. We will collect these data for both demonstration school years. We also will request the information for the year prior to the beginning of the demonstration to (1) improve the precision of our estimates of the impacts of DC-M on certification and participation in the DC-M1 States, and (2) enable pre-post comparisons in the DC-M2 States.⁶ This data collection activity will involve a total of five individuals in Year 1 and fewer than ten individuals in Year 2.

b. State Cost Data

⁶ We obtained some SY 2011–2012 data from States during the sample frame development process and will not need to request such data again.

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For the State-level cost data collection, State Child Nutrition Directors and Medicaid Directors will be sent tracking logs (Appendices B-2 and B-3) to monitor hours spent on start-up and ongoing activities related to DC-M, then will be interviewed (follow-up interview protocols presented in Appendices C-1 and C-2) three times during the school year so we can develop a more detailed understanding of the costs described and to ascertain if some costs have been missed. Prior to the data collection, we will explain the cost data collection, including the tracking logs and the follow-up interviews, during one of the monthly conference calls FNS holds with representatives of each demonstration State.

In SY 2012-2013 and SY 2013-2014, Mathematica will encourage State agency staff to keep monthly or weekly logs of DC-M activities, staff involved in the activities, and estimated hours spent on DC-M activities. We will ask them to complete logs for July through March. Logs will be collected quarterly, and the interviews will be conducted early in the next month. The first follow-up interview will be in November, covering July through September; the second in February, covering October through December; and the third will be in April, covering January through March.

c. School District Cost Data

At the school district level, a district cost survey will obtain data on the start-up costs of DC-M and the ongoing costs related both to direct certification and to certification using household applications.

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The first round of district-level cost data collection will include 690 school districts from the initial five demonstration States.⁷ We will provide draft letters/emails (Appendix E-1, E-2, and E-3) for State agency staff to use to inform school districts of the upcoming data collection and instruct them on how to participate. In July 2013, we will ask school district administrators (School Food Authority (SFA) directors and business managers) to provide retrospective information (Appendix F-1) on costs for the previous year, SY 2012-2013. We will ask them to report on costs of certification activities during the initial part of the school year (August through October 2012), and then, ask them to report for a typical month during the rest of the school year. The second round of cost data collection will include approximately 1,200 school districts from the first five demonstration States as well as the second set of demonstration States. Beginning in September 2013, we will ask school district administrators to provide cost information bimonthly (Appendix F-2) for the two previous calendar months. We will request this information five times during SY 2013-2014.

The school district cost survey (Appendices F-1, F-2) will be completed as web-based surveys. The survey will ask these respondents to identify which staff conducted specific certification activities during the key months in which NSLP/SBP certification activities tend to occur. For each staff member, the SFA director or business manager will record the total time spent on certification activities and the person's direct and indirect labor rates. The

⁷ This number includes all 32 community districts in New York City. However, a single respondent will provide the data for all 32 community districts. Thus, in total, there will be 659 SFA directors and 659 business managers asked to report on 690 districts.

survey will also ask about other categories of costs related to certification and about school district characteristics and direct certification procedures.

d. Challenges Data

We plan to conduct semi-structured telephone interviews with respondents (described below) to learn about their challenges with DC-M (challenge interview protocols are presented in Appendix H). For states that began the demonstration in SY 2012-2013, we will conduct interviews with state-level respondents in both SY 2012-2013 and SY 2013-2014. For states that will enter the demonstration in SY 2013-2014, and for school district-level respondents in both cohorts, we will conduct interviews in SY 2013-2014 only. In each year, we will conduct two rounds of interviews; the first round will take place in the fall, and the second round in the second semester. The first interview for each state or school district will focus on challenges experienced in their initial DC-M match at the beginning of, or shortly before, the school year. The second interview each year will identify challenges with their subsequent matching.

State Interviews (Appendix H-1, H-2, H-4, H-5). Two State offices are likely to be involved in the state interviews: (1) the State Child Nutrition Agency and (2) the State Medicaid Agency. We will conduct a separate interview with each of the two agencies in SY 2013-2014. In SY 2012-2013, we will interview only nine people, including at least one from each State. Staff in each agency will be given the opportunity to determine who is most suitable for participation in the interview. Before the interview, we will send a letter (Appendix I-1) to the primary contact at the agency explaining the

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purpose of the interviews and describing the general nature of the interview questions. An interviewer will follow up with each person by telephone (Appendix I-3) and attempt to schedule the interview.

School District Interviews (Appendix H-3 and H-6). School district interviews will follow the same approach as State interviews. We will interview staff (typically the SFA director) from an average of 6 school districts in each study State where DC-M matching is conducted at the local level, for a total of approximately 30 school districts attempted. We expect a 90 percent response rate for a total of 27 district challenge interview respondents.

3. Match Validation Administrative Data (Substudy)

The Match Validation Substudy will collect administrative data for SY 2013-2014 to independently validate matches made in 12 selected demonstration school districts across three States, using varying levels of match stringency. Data will include the individual-level Medicaid and student enrollment files used in the direct certification process at the beginning of SY 2013-2014 as well as the final certification file indicating the outcome of DC-M. We will also collect detailed information on the rules and algorithms used for the matching.

In summer 2013, we will collect Medicaid data from State agency staff in all three States in the MVS. Most other data will be collected from the agency that conducts the match: either the State Child Nutrition Agency or the school district.⁸

⁸ We plan to collect data from ten districts directly (in states where DC-M matching is conducted at the local level), and data for two other districts from the state agency (in a state where matching is conducted centrally).

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A secure file transfer protocol (FTP) site will be created for the States and school districts to use in transmitting their data with a unique password for each State and district. Mathematica staff will work with State and school district data managers to address any questions and provide technical assistance with transferring the files, as needed.

4. Dissemination

The analyses derived from this data collection will be presented in two reports to Congress, one detailing the results for SY 2012-2013 of the demonstration and a second incorporating the results for SY 2013-2014. Three additional reports will present analyses related to (1) the Access Evaluation, (2) the Match Validation Substudy (MVS), and (3) the NSLP Afterschool Snack Program (ASP) and the Special Milk Program (SMP).

A.3. Use of Improved Information Technology to Reduce Burden

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

FNS is committed to complying with the E-Government Act of 2002 to promote the use of technology. Because school district, State, and Medicaid staff resources are limited, the following technological collection techniques have been incorporated into the data collection to minimize the burden on these agencies. The State-level cost data collection will collect information via a tracking spreadsheet (Appendix B) into which designated staff can easily enter requested data on a monthly basis and return it to Mathematica

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by electronic mail or fax. The study will use a web-based survey to collect the district cost data (Appendix F) as an efficient alternative to conducting interviews and tracking responses on paper. Features such as data quality checks and programmed skip patterns on the web survey instrument will reduce respondent burden and minimize any questions asked in error. Electronic mail will be used, when possible, to send reminders and other communications to State and school district staff.

A.4. Efforts to Identify and Avoid Duplication

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.

The information on costs and challenges to be collected in this study does not exist elsewhere. There is currently no information on whether DC-M has an impact on NSLP/SBP costs and participation. Although direct certification has been conducted with other programs (such as SNAP, Temporary Assistance for Needy Families (TANF), and Food Distribution Program on Indian Reservations (FDPIR)), DC-M has not been authorized before this demonstration. To avoid duplication, the administrative records data on certification and meal participation collected for the Participation and Cost Evaluation is information that States typically collect from school districts for administrative reporting, and the enrollment files collected for the MVS will be existing data files used by the States and school districts to conduct DC-M.

A.5. Efforts to Minimize Burden on Small Businesses or Other Entities

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

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We will not contact any small businesses during the course of this study. Approximately 85 percent of the school districts in Year 1 of the study have populations of fewer than 50,000 people; we expect a similar proportion of Year 2 districts will have populations of this size. These districts will provide the same types of data as larger school districts, but for smaller numbers of students.

A.6. Consequences of Less Frequent Data Collection

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.

If this study is not conducted, USDA would be prevented from meeting its Federal obligation under Healthy, Hunger-Free Kids Act of 2010, which requires this demonstration project to be conducted. USDA would also be unable to submit to Congress the interim report (due no later than October 1, 2014) and final report (due no later than October 1, 2015) describing the results of the demonstration, also mandated by this legislation. The planned data collection described in this submission is necessary for FNS to understand and evaluate the effects of DC-M in determining eligibility for free school meals. In the absence of these results, FNS will lack the means to accurately assess the effect of DC-M on students' access to free school meals, as well as the costs of DC-M.

A.7. Special Circumstances Requiring Collection of Information in a Manner Inconsistent with Section 1320.5(d)(2) of the Code of Federal Regulations

Explain any special circumstances that would cause an information collection to be conducted in a manner:

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- **Requiring respondents to report information to the agency more often than quarterly**

In SY 2013-2014, district cost survey respondents (typically SFA directors and business managers) will submit cost data five times during the year. This is slightly more often than quarterly but is necessary for the collection of quality data because more frequent data collection will reduce the recall period, and the reporting of hours spent on DC-M is likely to be more reliable if collected soon after the costs are incurred.

- **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**
 - **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.

A.8. Federal Register Comments and Efforts to Consult with Persons Outside the Agency

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.

a. Federal Register Notice and Comments

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, 02/14/2013, volume 78, number 31, pages 10593-10595. Six public comments were received and are included in Appendix L, along with the response to these comments.

b. Consultations Outside of the Agency

In addition to soliciting comments from the public, FNS consulted with the following individuals for expert consultation about the availability of data, the design, level of burden, and clarity of instructions for this collection:

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Table A.8.1. Individuals Consulted

Name	Title	Affiliation	Telephone Number
Marianne Bitler	Associate Professor of Economics/Peer Reviewer	University of California-Irvine	949-824-5606
Logan Dreasky	Manager Eligibility Section—Medicaid Policy Division/Peer Reviewer	Michigan Department of Community Health	517-241-5414
Joanne Guthrie	Nutritionist/Peer Reviewer	Economic Research Service	202-694-5373
Mary Jo Tuckwell	Technical Director for Consulting Services/Peer Reviewer	inTEAM Associates	715-765-4244
Michael Jacobsen	NASS Methods Reviewer	NASS	202-690-8639

A.9. Payments to Respondents

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

No Federal funds will be made available to States or school districts for the purpose of participating in this demonstration.

A.10. Assurance of Confidentiality

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

Participants in this study will be subject to assurances and safeguards as provided by the Privacy Act of 1974 (5 USC 552(a)), which requires the safeguarding of individuals against invasion of privacy. A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991, Volume 56, page 19078, discusses the terms of protections that will be provided to respondents.

All information collected for the evaluation will be used for research purposes only. Individuals participating in this study will be notified that the information they provide will not be published in a form that identifies them. When reporting the results, data will be presented only in aggregate form so

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that individuals and institutions will not be identified. Mathematica will employ the following safeguards to carry out confidentiality assurances during the study:

- All employees at Mathematica sign a confidentiality pledge (Appendix J) emphasizing its importance and describing their obligation.
- Access to identifying information on survey respondents as well as children and families whose data are being collected as a part of this study will be limited to those who have direct responsibility for collecting or analyzing the data and for providing and maintaining sample information. At the conclusion of the research, these data will be destroyed.
- Identifying information will be maintained on separate forms and files, which are linked only by sample identification number.
 - Employees will be required to notify their supervisors, the project director, and the Mathematica security officer if private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner. The project director and Mathematica security officer, in consultation with FNS, will then determine the appropriate action to be taken based on the nature of the breach of privacy.

A.11. Questions of a Sensitive Nature

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.

As a part of the cost data collection, salary information will be collected because it is necessary to compute costs. Although this may be considered private information, we will only need job titles, first names, or initials to be linked to the salaries; full names of individuals will not be required. The interview questions about DC-M challenges (Appendix H) experienced by

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State and school district staff will primarily relate to those faced at start-up and during implementation of DC-M and will not be sensitive in nature.

A.12. Estimates of Respondent Burden

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 13 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.**

Respondent groups include (1) State-level administrators, including State Child Nutrition Directors that administer the NSLP and SBP and State Medicaid Directors and (2) school district administrators, including SFA directors, business managers, and data managers.

The total estimated sample is 2,428 individuals. This includes (1) 18 State administrators (nine State Child Nutrition Agency Directors and nine State Medicaid directors) and (2) 1,920 school district administrators (including 960 SFA directors and 960 business managers who may contribute salary information for the district cost survey (Appendix F)), many of whom are included in more than one data collection activity. This number also includes 483 district cost survey non-responders, and the 10 district data managers that will respond to the MVS. The 2012-2013 sample is a subset of the 2013-2014 sample.

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The state administrative certification and participation data collection (Appendix A-1) burden estimate is 4.00 hours (240 minutes) for each request and the accompanying email (Appendix A-2) burden estimate is 0.03 hours (2 minutes). The state and district challenge interview burden estimates are 1.00 hour (60 minutes) for each interview, inclusive of 0.084 hours (5 minutes) to review the advance letter (Appendix I), 0.05 hours (3 minutes) for a scheduling call (Appendix I), and 0.866 hours (52 minutes) to complete the telephone interview itself (Appendix H). The burden for each state cost survey is 3.50 hours, which represents 0.03 hours (2 minutes) to review the introductory email, 0.05 hours (3 minutes) to review the introductory letter, 2.89 hours (173 minutes) for completing each tracking log (Appendices B-2 and B-3), 0.03 hours (2 minutes) to review the follow-up email (Appendix D-6), and 0.50 hours (30 minutes) for each follow-up interview (Appendix C), including time to prepare for the follow-up interview. For the web-based district cost survey (Appendix F), the burden estimate is 1.00 hours (60 minutes) in the summer of 2013 and 0.948 hours (57 minutes) for each response in the 2013-2014 school year. These estimates include 0.084 hours (5 minutes) to review the introductory letter from the state (Appendices E-1 through E-3), 0.084 hours (5 minutes) to review the advance letter (Appendix G-1), 0.03 hours (2 minutes) to review the follow-up email (Appendix G-2) in each round, in addition to 0.802 hours (48 minutes) to gather cost data and complete the web survey on retrospective costs for 2012-2013 (Appendix F-1) and 0.75 hours (45 minutes) to gather cost data and complete each web survey in 2013-2014 (Appendix F-2). For the Match Validation Substudy, the

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burden for State Child Nutrition and Medicaid directors is expected to be 5.0 hours total, per response. The burden for SFA directors and data managers in the Match Validation Study is estimated to be 2.5 hours total, per response. These MVS estimates include time to fully explain the request to the main contact and the data manager, for the data manager to pull the data, and to answer any follow-up questions. For all persons who decline to participate in the district cost survey (Appendix F) or challenge interview (Appendix H), the burden estimate is 0.1667 hours (10 minutes) and includes time to read a letter and respond to a telephone call.

A total of 9,484.04 burden hours and a total annualized cost to respondents of \$347,140.96 are estimated for this study. Table A.12.1 shows sample sizes, estimated burden, and annualized costs for each data collection component. The estimates are based on experience with comparable instruments on similar studies and will be adjusted, if necessary, based on pre-test results.

An estimated 100 percent of State administrators are expected to respond to each State-level data collection activity, 90 percent of school district administrators are expected to respond to the challenge interviews (Appendix H), and 80 percent of school district administrators are expected to respond to the district cost survey (Appendix F) .

Table A.12.1. Annual Burden Estimate

Respondent Type	Instrument	Sample Size (Districts)	Sample Size (Individuals)	Number of Respondents	Responsive				Non-Response				Total Burden Hours	Total Annualized Cost of Respondent Burden ^a	
					Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response			Total Annual Burden
Demonstration School Year 1 (2012-2013)															
State Administrative Data Collection															
(State Government) State CN Directors	Certification and Participation Data Request (Appendix A-1)	NA	5	5	2	10	4.000	40.00	0	0	0	0	0	40.00	1,534.40
(State Government) State CN Directors	Certification and Participation Data Request Email (Appendix A-2)	NA	5	5	2	10	0.030	0.30	0	0	0	0	0	0.30	11.51
State Challenge Data Collection															
(State Government) State CN and Medicaid Directors	State Challenge Interviews (Appendix H-1, H-2, H-4, H-5)	NA	9	9	2	18	0.866	15.59	0	0	0	0	0.00	15.59	597.96
(State Government) State CN and Medicaid Directors	State Challenge Interview Letter (Appendix I-1)	NA	9	9	1	9	0.084	0.76	0	0	0	0	0.00	0.76	29.00
(State Government) State CN and Medicaid Directors	State Challenge Interview Scheduling Call (Appendix I-3)	NA	9	9	2	18	0.050	0.90	0	0	0	0	0.00	0.90	34.52
State Child Nutrition Agency Cost Data Collection															
(State Government) State CN Directors	State Cost Data Collection Tracking Logs (Appendix B-1)	NA	5	5	4	20	2.890	57.80	0	0	0	0	0.00	57.80	2,217.21
(State Government) State CN Directors	State Cost Data Collection Follow-Up Interview (Appendix C-1)	NA	5	5	3	15	0.500	7.50	0	0	0	0	0.00	7.50	287.70
(State Government) State CN Directors	State Cost Survey Introductory Email (Appendix D-1)	NA	5	5	1	5	0.030	0.15	0	0	0	0	0.00	0.15	5.75
(State Government) State CN Directors	State Cost Survey Letter (Appendices D-2 and D-3)	NA	5	5	4	20	0.050	1.00	0	0	0	0	0.00	1.00	38.36
(State Government) State CN Directors	State Cost Survey Follow-up Interview Email (Appendix D-6)	NA	5	5	3	15	0.030	0.45	0	0	0	0	0.00	0.45	17.26
State Medicaid Agency Cost Data Collection															

Respondent Type	Instrument	Sample Size (Districts)	Sample Size (Individuals)	Responsive					Non-Response					Total Burden Hours	Total Annualized Cost of Respondent Burden ^a
				Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden		
(State Government) Medicaid Directors	State Cost Data Collection - Tracking Logs (Appendix B-2)	NA	5	5	4	20	2.890	57.80	0	0	0	0	0.00	57.80	2217.21
(State Government) Medicaid Directors	State Cost Data Collection - Follow-up Interview (Appendix C-2)	NA	5	5	3	15	0.500	7.50	0	0	0	0	0.00	7.50	287.70
(State Government) Medicaid Directors	State Cost Survey Introductory Email (Appendix D-1)	NA	5	5	1	5	0.030	0.15	0	0	0	0	0.00	0.15	5.75
(State Government) Medicaid Directors	State Cost Survey Letter (Appendices D-4 and D-5)	NA	5	5	4	20	0.050	1.00	0	0	0	0	0.00	1.00	38.36
(State Government) Medicaid Directors	State Cost Survey Follow-up Interview Email (Appendix D-6)	NA	5	5	3	15	0.030	0.45	0	0	0	0.000	0.00	0.45	17.26
District Cost Data Collection															
(Local Government) SFA Directors and Business Managers - Pre-Test Respondents	Pretest District Cost Survey (Summer 2013) (Appendix F-1)	9	9	9	1	9	0.886	7.97	0	0	0	0.000	0.00	7.97	290.83
(Local Government) SFA Directors and Business Managers - Pre-Test Respondents	Pretest - District Cost Survey Advance Letter (Appendix G-1)	9	9	9	1	9	0.084	0.76	0	0	0	0.000	0.00	0.76	27.73
(Local Government) SFA Directors and Business Managers - Pre-Test Respondents	Pre-test District Cost Survey Follow-up Email (Appendix G-2)	9	9	9	1	9	0.030	0.27	0	0	0	0.000	0.00	0.27	9.85
(Local Government) SFA Directors and Business Managers	District Cost Survey on the Web Summer 2013 (Appendix F-1)	690 ^b	1318	1054	1	1054	0.802	845.63	264	1	264	0.167	44.01	889.64	32,476.46
(Local Government) SFA Directors and Business Managers	State letter to districts (Appendices E-1 through E-3)	690 ^b	1054	1054	1	1054	0.084	88.57	0	0	0	0.000	0.00	88.57	3231.90
(Local Government) SFA Directors and Business Managers	District Cost Survey Advance letter (Appendix G-1)	690 ^b	1054	1054	1	1054	0.084	88.57	0	0	0	0.000	0.00	88.57	3231.90
(Local Government) SFA Directors and Business Managers	District Cost Survey Follow-up E-mail (Appendix G-2)	690 ^b	1054	1054	1	1054	0.030	31.63	0	0	0	0.000	0.00	31.63	1154.18
Year 1 Total		690^c	1337^c	1073^c	4.15	4460	0.28	1254.75	264	1	264	0.167	44.01	1,298.76	47,762.80
Demonstration School Year 2 (2013-2014)															

Respondent Type	Instrument	Sample Size (Districts)	Sample Size (Individuals)	Responsive					Non-Response					Total Burden Hours	Total Annualized Cost of Respondent Burden ^a
				Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden		
State Administrative Data Collection															
(State Government) State CN Directors	Certification and Participation Data Request (Appendix A-1)	NA	9	9	2	18	4.000	72.00	0	0	0	0	0	72.00	2,761.92
(State Government) State CN Directors	Certification and Participation Data Request Email (Appendix A-2)	NA	9	9	2	18	0.030	.54	0	0	0	0	0	0.54	20.71
State Challenge Data Collection															
(State Government) State CN and Medicaid Directors	State Challenge Interviews (Appendix H-1, H-2, H-4, H-5)	NA	18	18	2	36	0.866	31.18	0	0	0	0.000	0.00	31.18	1195.91
(State Government) State CN and Medicaid Directors	State Challenge Interview Letter (Appendix I-1)	NA	18	18	1	18	0.084	1.512	0	0	0	0.000	0.00	1.51	58.00
(State Government) State CN and Medicaid Directors	State Challenge Interview Scheduling Call (Appendix I-3)	NA	18	18	2	36	0.050	1.800	0	0	0	0.000	0.00	1.80	69.05
District Challenge Data Collection															
(Local Government) SFA Directors	District Challenge Interviews (Appendix H-3 and H-6)	30	30	27	2	54	0.866	46.76	3	1	3	0.167	0.50	47.26	1724.52
(Local Government) SFA Directors	District Challenge Interview Letter (Appendix I-2)	30	27	27	1	27	0.084	2.27	0	0	0	0.000	0.00	2.27	82.83
(Local Government) SFA Directors	District Challenge Interview Scheduling Call (Appendix I-4)	30	27	27	2	54	0.050	2.70	0	0	0	0.000	0.00	2.70	98.52
State Child Nutrition Agency Cost Data Collection															
(State Government) State CN Directors	State Cost Data Collection Tracking Logs (Appendix B-1)	NA	9	9	4	36	2.890	104.04	0	0	0	0.000	0.00	104.04	3990.97
(State Government) State CN Directors	State Cost Data Collection Follow-Up Interview (Appendix C-1)	NA	9	9	3	27	0.500	13.5	0	0	0	0.000	0.00	13.50	517.86
(State Government) State CN Directors	State Cost Survey Introductory Email (Appendix D-1)	NA	9	9	1	9	0.030	0.27	0	0	0	0.000	0.00	0.27	10.36
(State Government)	State Cost Survey	NA	9	9	4	36	0.050	1.80	0	0	0	0.000	0.00	1.80	69.05

Respondent Type	Instrument	Sample Size (Districts)	Sample Size (Individuals)	Responsive					Non-Response					Total Burden Hours	Total Annualized Cost of Respondent Burden ^a	
				Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden			
State CN Directors	Letter (Appendices D-2 and D-3)															
(State Government) State CN Directors	State Cost Survey Follow-up Interview Email (Appendix D-6)	NA	9	9	3	27	0.030	0.81	0	0	0	0.000	0.00	0.81	31.07	
State Medicaid Agency Cost Data Collection																
(State Government) Medicaid Directors	State Cost Data Collection - Tracking Logs (Appendix B-2)	NA	9	9	4	36	2.890	104.04	0	0	0	0.000	0.00	104.04	3990.97	
(State Government) Medicaid Directors	State Cost Data Collection - Follow-up Interview (Appendix C-2)	NA	9	9	3	27	0.500	13.50	0	0	0	0.000	0.00	13.50	517.86	
(State Government) Medicaid Directors	State Cost Survey Introductory Email (Appendix D-1)	NA	9	9	1	9	0.030	0.27	0	0	0	0.000	0.00	0.27	10.36	
(State Government) Medicaid Directors	State Cost Survey Letter (Appendices D-4 and D-5)	NA	9	9	4	36	0.050	1.80	0	0	0	0.000	0.00	1.80	69.05	
(State Government) Medicaid Directors	State Cost Survey Follow-up Interview Email (Appendix D-6)	NA	9	9	3	27	0.030	0.81	0	0	0	0.000	0.00	0.81	31.07	
District Cost Data Collection																
(Local Government) SFA Directors and Business Managers	District Cost Survey (Appendix F-2)	1200	2400	1920	5	9600	0.750	7200	480	1	480	0.167	80.02	7280.02	265,647.93	
(Local Government) SFA Directors and Business Managers	State Letter to Districts (Appendices E-1 through E-3)	1200	2400	1920	1	1920	0.084	161.28	0	0	0	0.000	0.00	161.28	5885.11	
(Local Government) SFA Directors and Business Managers	District Cost Survey Advance Letter (Appendix G-1)	1200	2400	1920	1	1920	0.084	161.28	0	0	0	0.000	0.00	161.28	5885.11	
(Local Government) SFA Directors and Business Managers	District Cost Survey Follow-up Email (Appendix G-2)	1200	2400	1920	1	1920	0.030	57.60	0	0	0	0.000	0.00	57.60	2101.82	
Match Validation Substudy																
(State Government) Medicaid Directors	Match Validation Substudy (Summer 2013)	NA	3	3	1	3	5.000	15.00	0	0	0	0.000	0.00	15.00	575.40	
(State Government) State CN Directors	Match Validation Substudy (Summer 2013)	NA	1	1	2	2	5.000	10.00	0	0	0	0.000	0.00	10.00	383.60	
(Local Government) SFA Directors and Data Managers	Match Validation Substudy	10	20	20	2	40	2.500	100.00	0	0	0	0.000	0.00	100.00	3649.00	

Respondent Type	Instrument	Sample Size (Districts)	Sample Size (Individuals)	Responsive					Non-Response					Total Burden Hours	Total Annualized Cost of Respondent Burden ^a
				Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden		
	(Summer 2013)														
Year 2 Total		1200 ^c	2428 ^c	1948 ^c	8.18	15,936	0.509	8104.76	483	1.00	483	0.167	80.52	8185.28	299,378.05
Grand Total^d		1200	2428	1948	10.47	20,396	0.459	9359.50	483	1.55	747	0.167	124.53	9484.04	347,140.85
Annualized Burden = Year 1 + 2 / 3 year clearance period		630	1255	1087	6.25	6799	0.459	3120	249	1.00	249	0.167	42	3162	115,713.62

Notes: In this table CN = child nutrition and NA = Not applicable

We expect to achieve 100 percent response from State CN and Medicaid directors.

Due to rounding of the data in this table, the individual components may not appear to sum exactly to the totals.

^aFor state government respondents, we used North American Industry Classification System (NAICS) 999200: State Government (SOC Code 11-000) = \$38.36 per hour in computing the cost of respondent burden. For local government respondents, we used NAICS 999300: Local Government (SOC Code 11-000) = \$36.49 per hour.

^bA single pair of respondents will provide the data for all 32 community districts in New York City. Thus, in total, there will be 659 SFA directors and 659 business managers asked to respond for 690 districts.

^cAlthough the individuals responding to the challenge interviews and the State and SFA directors providing data for the MVS are also included in the cost data collection, each individual is counted only once in the Sample Size and Number of Respondents totals.

^dAll Year 1 respondents are also included in the Year 2 data collection.

A.13. Estimates of Other Annual Costs to Respondents

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 cost 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. The study will provide reporting tools to State and local agencies for the purpose of reporting cost data.

A.14. Estimates of Annualized Government Costs

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.

The total annual cost to the Federal government is \$1,128,885.98. The total cost of this study includes a four year, firm fixed-price contract with Mathematica for \$4,391,318 (which represents the contractor's costs for labor, other direct costs, and indirect costs. The annual cost of the contract is \$1,097,829.50. The cost of the FNS employee, social science research analyst/project officer, involved in project oversight with the study is estimated at GS-13, step 1 at \$42.66 for an estimated 728 hours per year, or \$31,056.48 annually. Federal employee pay rates are based on the Office of Personnel Management for 2012 for the Washington, DC, locality.

A.15. Changes in Hour Burden

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

This is a new collection of information. This program change is estimated to add 9,484.04 burden hours to the OMB collection inventory.

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A.16. Time Schedule, Publication, and Analysis Plans

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

The contractor will deliver analyses derived from this data collection to FNS via two reports to Congress, one detailing the results for SY 2012-2013 of the demonstration and a second incorporating the results for SY 2013-2014. In addition, the contractor will produce reports to present analyses related to (1) the Access Evaluation, (2) the Match Validation Substudy (MVS), and (3) the NSLP Afterschool Snack Program (ASP) and the Special Milk Program (SMP). We describe the analyses to be presented in these key deliverables in greater detail below. Each of the reports will present findings of the study in clear, nontechnical language that makes them understandable by a broad audience. Table A.16.1 presents the schedule for data collection and the delivery of these products to FNS.

Table A.16.1. Project Schedule

Task	Data Collection Period or Report Delivery Date
Data Collection	
<i>Access Evaluation Data</i>	
Medicaid enrollment files	Summer/Fall 2012
Student enrollment files	Summer/Fall 2012
<i>Participation and Cost Evaluation Data</i>	
Year 1 State Challenge Interviews and Cost Survey	SY 2012-2013
Year 1 Participation Data	SY 2012-2013
Year 1 District Cost Survey	July 2013–August 2013
Year 2 Challenge Interviews and Cost Survey (States and school districts)	SY 2013-2014
Year 2 Participation Data	SY 2013-2014
<i>MVS Data</i>	
Medicaid enrollment files	Summer 2013
Student enrollment files	Summer 2013
Final results files	Fall 2013
Analysis	
Access Evaluation Analysis	Fall 2012-Winter 2013
Participation and Cost Evaluation Analysis	Summer 2013- Winter 2014
Assessment of SES Certification Alternative Analysis	Summer 2014- Winter 2015
Reports	

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Task	Data Collection Period or Report Delivery Date
Submit final Access Evaluation report to FNS	6/17/2013
Submit final Year One report to FNS	9/26/2014
Submit final Year Two report to FNS	9/26/2015
Submit final Report on Directly Affected FNS Child Nutrition Programs to FNS	10/12/2015
Submit final Match Validation Substudy report to FNS	12/15/2015

Access Evaluation Report. The Access Evaluation report will compare the distribution of certification status determined through a simulation of DC-M with actual certification status in SY 2011–2012. Separate simulations will show the likely impact of DC-M under different matching algorithms and different policies.

Reports to Congress. The findings from the Participation and Cost Evaluation will be presented in two reports to Congress, one for each of the first two years of the demonstration. These reports will include the following:

- **Impact estimates.** We will estimate the impact of DC-M on (1) participation in the NSLP and SBP and (2) Federal meal costs and State and local administrative and implementation costs over two years of demonstrations. To estimate the impacts, we will compare the participation and cost outcomes of each demonstration school district in DC-M1 States with the outcomes of its matched control group school district, aggregating these differences across districts to generate State-level estimates of the impacts of DC-M. For DC-M2 States, we will compare within-State changes from before to after DC-M was implemented.
- **National cost projections.** The results of the impacts analysis will be used to develop national projections of the impact of DC-M on costs, assuming national implementation of DC-M in the future. Projections will be based on assumptions about (1) how to generalize the participation and cost results to other States and (2) how impacts evolve over time.
- **Challenges.** We will conduct a qualitative analysis of the challenges that States and school districts face when implementing DC-M. To identify key challenges, we will code the interview data and then examine themes in the coded data.
 - **Assessment of an SES alternative.** Finally, the reports will present estimates of the costs that school districts would incur if they implemented their own SES and will compare those costs to

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costs of traditional certification and reimbursement procedures (with and without DC-M).

The Year 1 Report to Congress will present participation and cost estimates and other findings from the first year of the demonstration, as well as projections based on the first year's data. The second Report to Congress will update the first using results from both years of the demonstration and document changes between the two years.

Report on other directly affected FNS Child Nutrition Programs.

This separate report will present the findings from the analyses of the impact of DC-M on two other FNS Child Nutrition Programs: the ASP and SMP. We will estimate the impact of DC-M on participation and on Federal meal reimbursement costs for these programs by comparing the outcomes of each demonstration school district in DC-M1 States with the outcomes of its matched control group school district. We will then aggregate these differences across districts to generate State-level estimates.

Match Validation Substudy Report. The MVS report will include two key sets of analyses. First, for each school district in the MVS, the results of the matching conducted by the district (or its State) will be compared with the matching results obtained by the contractor when using the same matching process, variables, and algorithms that were used by the district (or the State). Second, the results of the matching conducted by each school district (or its State) will be compared with the results from matching using algorithms for each of three levels of match stringency, with separate results presented for each of the three levels.

A.17. Display of Expiration Date for OMB Approval

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 forms will display the expiration date for OMB approval.

A.18. Exceptions to Certification Statement

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

There are no exceptions to the certification statement.