2014 SUPPORTING STATEMENT

[TITLE OF DOCKET]
OMB # _0584____ - __0559__

Contents

A.1 EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.

Authorizing Legislation

This is a revision of a currently approved information collection. In the 2010 Agriculture Appropriations Act (P.L. 111-80), Section 749(g), Congress authorized demonstration projects to develop and test methods of providing access to food for low-income children in urban and rural areas during the summer months when schools are not in regular session, as well as a rigorous independent evaluation of the projects regarding their effectiveness. The data being collected under this submission are necessary to meet the congressionally-mandated requirement for an independent evaluation of the Summer Electronic Benefit Transfer for Children (SEBTC) Demonstration being conducted by FNS under this authorizing legislation.

The first year of the SEBTC Demonstration, 2011, was a proof-of-concept (POC) period. The actual demonstration began in 2012 and continued through 2013. The data being collected under this submission are for the 2014 and potentially 2015-2016 years of the demonstration.

Background

Very Low Food Security Among Children During the Summer Months

Despite the existence of three USDA food programs that provide meals directly to children, many children are not food secure and some meet the standard for Very Low Food Security (VLFS). Furthermore, the available evidence suggests that levels of VLFS are even higher during the summer months when most children are not in school. During the school year, most children in low-income households (income $\leq$185 percent of the poverty level) have access to free or reduced-price meals through the School Breakfast Program (SBP) and the National School Lunch Program (NSLP). In contrast, summer access to meals through the Summer Food Service Program (SFSP) is much more limited. There are significant geographic gaps in the availability of the SFSP—even in those communities where the program operates, rates of participation by eligible children are well below rates of participation for the SBP and NSLP. Gaps in coverage by the SFSP are among several factors responsible for the summer spike in VLFS.

National data for 2008 show that 21 percent of all ***households with children*** experienced low or very low food security, and 1.5 percent of all ***children*** experienced VLFS (Nord et al. 2009). Food insecurity is considerably higher among the low income population; 39 percent experienced low or very low food security (17 percent VLFS) which translates to 3.1 percent of VLFS among children. In addition, 20 percent of food insecure households obtained emergency food from a local food pantry or emergency kitchen, suggesting that households at greatest risk of VLFS seek food assistance from multiple sources (Nord et al. 2009). In fact, in 2009, 33 percent of families with children visiting food pantries in the Feeding America National Network had VLFS, and another 43 percent had low food security (Mabli et al. 2010). National data from the Current Population Survey (CPS) indicate that food insecurity changes seasonally. Households with school-age children have a higher prevalence of food insecurity in the summer, and rates of food insecurity were greater in states with fewer SFSP and summertime NSLP meals (Nord and Romig 2006). The summer spike in food insecurity among children is consistent with anecdotal reports that emergency kitchens see more children accompanying adults in summer months.

Congressionally Mandated Summer EBT for Children Demonstrations

The SFSP was implemented in 1975 to reduce the risk that children in low-income households would miss meals during the summer when they have little or no access to the NSLP and SBP. Research suggests that an expanded SFSP could, in principle, substantially reduce, though not eliminate, the summer spike in VLFS among children (Nord and Romig 2006). However, logistical and other practical considerations would present barriers to such expansion. The SFSP is operated by local community-based organizations in churches, recreation centers, schools, and the like. It would be challenging to find additional program operators and locations to expand the program sufficiently to dramatically increase access to it. Furthermore, even in those areas where substantial expansion of the SFSP would be feasible, rates of participation by eligible children would likely remain below those for the NSLP and SBP. An earlier evaluation of the SFSP reported various barriers to SFSP participation, including lack of transportation, lack of publicity about the program, limited days and hours of site operations, lack of program activities, and parents' concerns about neighborhood safety (Gordon and Briefel 2003). In addition, most SFPS sites operate for eight weeks or less, leaving low-income children with several weeks in the summer with no SFSP or alternative program for meals.

In response to the high prevalence of VLFS among low-income children when school is not in session, Congress has mandated that USDA implement demonstrations of two approaches to reducing the risk that children will miss meals during the summer. The first of these demonstrations enhanced the existing SFSP so that it can serve more children in the demonstration sites. The second of these demonstrations, which is the subject of this evaluation, has used existing SNAP and WIC benefit delivery systems to enhance the food purchasing power of households with eligible children during the summer months. More specifically, the benefits are delivered through the electronic benefit transfer (EBT) procedures used by the SNAP and the WIC program. This Summer EBT Benefits for Children demonstrations have supplemented rather than replace SFSP in the demonstration sites.

In authorizing the demonstrations, Congress mandated that USDA provide for their rigorous independent evaluation. The demonstrations and evaluation have provided and will continue to provide USDA and Congress with comprehensive research findings that will allow policy makers to determine whether the SEBTC methodology is a feasible and effective strategy for reducing VLFS, reducing low food security, and improving nutrition status among children in low-income households.

The SEBTC benefit was provided to households of children from pre-kindergarten through 12th grade who are certified for free and reduced-price (FRP) school meals in the demonstration school food authorities (SFAs). The amount of the benefit in 2011 and 2012, an approximately $60 value per summer month per eligible child in the household, is comparable to the cost of free lunches plus breakfasts under the NSLP and SBP. Benefits—provided monthly on an EBT card and prorated for partial summer months—were administered by grantees in the summer for the period when schools are not in session.[1] FNS added a third demonstration year in 2013 to evaluate two levels of SEBTC benefits—a $60 value versus $30 value per month per eligible child in the household. The 2014 demonstrations will provide benefits to the same households at the same levels as were provided in 2013.

Evaluation Objectives

The 2014 evaluation of SEBTC has two broad objectives: (1) to describe the receipt and use of the benefits and (2) to describe the implementation of the SEBTC in terms of approaches used and the challenges and lessons learned during the demonstrations.

A.2 INDICATE HOW, BY WHOM, HOW FREQUENTLY, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED. EXCEPT FOR A NEW COLLECTION, INDICATE THE ACTUAL USE THE AGENCY HAS MADE OF THE INFORMATION RECEIVED FROM THE CURRENT COLLECTION.

This section of the supporting statement provides an overview of the research design and data collection efforts planned to meet the overall objectives of the *Summer Electronic Benefits Transfer for Children (SEBTC) Demonstration: Evaluation Findings for the Fourth Implementation Year.*

[1] More information on these evaluations and projects can be found on the FNS website at [http://www.fns.usda.gov/ops/summer-food-children-demonstrations].

Overview of the Research Design

The USDA/FNS released a Request for Application (on August 11, 2010 which closed October 29, 2010 under OMB Control Number 0584-0512, expiration date: 1/31/2016 to States that are implementing either EBT systems for SNAP or for WIC. From among those States, USDA awarded five grants in Year 1 (school year 2010/11) for the proof-of-concept year that targeted 5,000 households. Each grantee had a single site.[2] The second year, referred to as the "full implementation year" expanded the demonstration to 10 State agencies (grantees) and a total of 14 sites, and targeted 27,000 households for the evaluation (school year 2011/2012). In Year 3 (school year 2012/2013), all 10 grantees provided SEBTC benefits ($60) in 2013 to all of the households who received them in 2012, if they still had eligible children. For the evaluation component, FNS selected four of the 2012 grantees (Chickasaw Nation, Delaware, Michigan, and Oregon) to implement the 2013 demonstration ($30 benefits vs. $60 benefits)) and evaluation in six sites (targeting 18,000 households). The 2014 evaluation will examine 5 States that participated in the 2013 demonstration and evaluation. This collection will not re-contact any households that participated in prior phases of this study.

Measures

Exhibit A.1 provides an overview of the research objectives for the study, the outcome measures and the data sources.

[2] The term "grantee" refers to the State agency or group of agencies implementing the demonstration. In 2013, two of the 10 grantees are Indian Tribal Organizations (ITOs) with demonstration sites in Oklahoma. For this report, the term "State" or grantee refers to the 10 grantees composed of eight States and two ITOs.

Exhibit A.1. SEBT for Children Evaluation Research Objectives, Outcomes, Subgroups for Analysis, Data Sources, and Analysis Methods

Research Objectives	Subgroups Represented in Analysis	Data Sources	Analysis Methods
Use of Benefits by Participants	By site By demonstration type (SNAP vs. WIC) By benefit level	• EBT transaction data	Descriptive statistics presented in tables, cross-tabs, and charts
Implementation of Demonstrations	By site By demonstration type (SNAP vs. WIC)	• Stakeholder (grantee or school) interviews	Descriptive lists, tables, and narrative

Use of Benefits Analysis

In the 2011 and 2012 reports, the SEBTC evaluation described patterns of use of the $60 SEBTC benefit for households in the treatment group. In 2013, in addition to providing similar descriptive results for households who received the $60 SEBTC benefit and the $30 benefit, the evaluation also assessed the differential impact of a $60 SEBTC benefit relative to a $30 benefit on SEBTC participation (i.e., any use of the SEBTC benefit), the proportion of SEBTC that households redeemed SEBTC benefits, and the proportion of households that exhausted all of their SEBTC benefits in at least one month. The 2014 evaluation will also provide these descriptions.

Specifically, the research questions for the analysis of SEBTC benefit use are:

1. How do the participants use their SEBTC benefits? What are their respective benefit participation, redemption, and exhaustion rates, overall and by site? For households in WIC sites, how do redemptions vary by food category?
2. What are the size and types of stores at which the benefits are used?
3. In WIC sites, what foods are purchased by participants with their benefits? For households in WIC sites, what specific foods within the food categories are purchased?
4. For rates of SEBTC participation, redemption, and benefit exhaustion, do impacts vary by benefit amount ($60 vs. $30), site, and demonstration model?

The analysis will use EBT transaction data collected from the evaluation sites. Grantees/site administrators and EBT vendors will provide EBT data, which can be used to examine benefit issuances, redemptions, and other transactions (such as returns and reversals) for each month of the SEBTC benefit period. Data from the SNAP and WIC systems will provide the date, time, and total dollar value of each purchase transaction. In addition to the purchase-level data, the WIC data will provide separate transactions for each category of food issued and redeemed, allowing for the analysis of redemptions at the aggregate and food category levels for the WIC-model sites.

The transactions for each household will be aggregated to produce net amounts for benefits issued and redeemed for each issuance cycle, and then the monthly benefits issued and redeemed for the summer will be summed (taking into account benefits carried over from month to month in the SNAP sites). All outcomes are defined for the entire summer. A household is defined as having exhausted benefits if it spent the maximum redeemable amount in one or more months in the summer. These research questions are descriptive, and they are addressed by describing the pooled results on the levels of the key SEBTC benefit use outcomes for the $60 SEBTC benefit group and separately for the $30 group. The analyses will also present additional descriptive tabulations on the dollar value of benefits issued and redeemed, and the percentage of benefits redeemed by food category in the WIC model sites. The descriptive analysis also reports differences in the patterns of SEBTC benefit use among the evaluation sites. The descriptive analyses do not control for observable differences among the sites.

Implementation Study

Successful implementation of the demonstrations has required the involvement and cooperation of a number of state and local agencies and vendors in each demonstration site. Local school food authorities (SFAs), either individually or in combination, administer the demonstration sites; however, the state WIC, SNAP, or NSLP/SBP agencies are the formal recipients of the USDA grants for the demonstrations, with legal responsibility for their implementation and operation. Substantial cooperation, including data sharing, was promised by the schools and school districts served by the SFAs as well as by the state education agency. EBT vendors for SNAP and WIC deliver the SEBTC benefits to participating households. The evaluation will include qualitative interviews with these stakeholders (Appendix C) in order to document the implementation processes, challenges, and lessons from the demonstrations. The responses from these interviews will be incorporated into a training document for future SEBTC demonstration expansion sites.

The Implementation Study will address three research questions:

1. Are the three different models of SEBTC: 1) WIC; 2) SNAP; and 3) SNAP hybrid operationally feasible? If so, under what conditions?
2. How are the demonstrations implemented? What are the challenges encountered and lessons learned?

To address these research objectives, the team will conduct qualitative interviews with State grantees and school districts (stakeholders) to collection information on implementation and operations. This collection will not re-contact any households that participated in prior phases of this study.

Exhibit A.2 shows the data to be collected during stakeholder interviews.

Use of the Information

The information gathered in the data collection activities described above will be used by FNS to describe the use of benefits and implementation of the 2014 SEBTC demonstration. There is currently no other national effort that can address the research objectives of the proposed study.

Exhibit A.2: Topics and Respondents for Qualitative Stakeholder Interviews

Topic	State SNAP/WIC	School District/SFA	EBT Vendor
Plan demonstration and prepare application	✓	✓	✓
Identify eligible children and households	✓	✓	✓
Obtain consent for demonstration and evaluation		✓	
Inform selected parents/caretakers	✓	✓	✓
Distribute SEBTC cards	✓	✓	✓
Training for schools		✓	
Training for parents	✓	✓	✓
Training for/support for retailers	✓		✓
Other training and public information	✓	✓	✓
Project organization and management	✓	✓	✓
Replace cards/other participant support	✓	✓	✓
Prevent/detect losses and abuse	✓	✓	✓
Involve local agencies or community organizations	✓	✓	
Successes, challenges and solutions	✓	✓	✓
Feasibility of continuing and replicating demonstrations	✓	✓	✓
Implementation and operational costs	✓	✓	✓
Impact on program participation and operations	✓	✓	

Notes:
✓ indicates agency expected to be lead source for topic;

A.3 DESCRIBE WHETHER, AND TO WHAT EXTENT, THE COLLECTION OF INFORMATION INVOLVES THE USE OF AUTOMATED, ELECTRONIC, MECHANICAL, OR OTHER TECHNOLOGICAL COLLECTION TECHNIQUES OR OTHER FORMS OF INFORMATION TECHNOLOGY, E.G., PERMITTING ELECTRONIC SUBMISSION OF RESPONSES, AND THE BASIS FOR THE DECISION FOR ADOPTING THIS MEANS OF COLLECTION. ALSO, DESCRIBE ANY CONSIDERATION OF USING INFORMATION TECHNOLOGY TO REDUCE BURDEN

The study will comply with the E-Government Act of 2002 to promote the use of technology. The study will use computer-assisted telephone interviewing (CATI) for the client survey as an efficient alternative to conducting interviews and tracking responses on paper. Features such as programmed skip patterns on the survey instrument will reduce respondent burden and minimize any questions asked in error. By including programmed skip patterns, consistency and data range checks, these technologies reduce data entry error that often necessitate callbacks to respondents to clarify the responses recorded by an interviewer using pencil and paper to conduct an interview. No responses will be collected with the use electronic submission.

A.4 DESCRIBE EFFORTS TO IDENTIFY DUPLICATION. SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE DESCRIBED IN ITEM 2 ABOVE

The data requirements for the evaluation have been carefully reviewed to determine whether the needed information is already available. Efforts to identify duplication included a review of FNS reporting requirements, State administrative agency reporting requirements, and special studies by government and private agencies. It was concluded that no existing data sources can provide data needed to answer the study's research questions.

A.5 IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN

FNS has determined that the requirements for this information collection do not adversely impact small businesses or other small entities. Information being requested or required has been held to the minimum required for the intended use. Although smaller State agencies and SFAs will be involved in this data collection effort, they deliver the same program benefits and perform the same function as any other State agency and SFA. Thus, they maintain the same kinds of information on file. All grantees have agreed to participate in the evaluation and provide the necessary data. Data requirements include interviews with State and/or local agencies. Interviews will also be conducted with EBT vendors; however, none are small businesses.

A.6 DESCRIBE THE CONSEQUENCE TO FEDERAL PROGRAM OR POLICY ACTIVITIES IF THE COLLECTION IS NOT CONDUCTED OR IS CONDUCTED LESS FREQUENTLY, AS WELL AS ANY TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

This is a one-time data collection. The data collection for the proposed study will be conducted at two separate points in times during 2014 (once to obtain the transaction/administrative data and another time to conduct the qualitative interviews). If this study is not conducted, FNS will not have the data necessary to examine how the demonstration sites implemented SEBTC and how the benefits were used by households in 2014, which will be used to produce the required report to Congress and inform future program decisions.

A.7 EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances. The collection of information is conducted in a manner consistent with guidelines in 5 CFR 1320.5.

A.8 IF APPLICABLE, PROVIDE A COPY AND IDENTIFY THE DATE AND PAGE NUMBER OF PUBLICATION IN THE FEDERAL REGISTER OF THE AGENCY'S NOTICE, SOLICITING COMMENTS ON THE INFORMATION COLLECTION PRIOR TO SUBMISSION TO OMB. SUMMARIZE PUBLIC COMMENTS RECEIVED IN RESPONSE TO THAT NOTICE AND DESCRIBE ACTIONS TAKEN BY THE AGENCY IN RESPONSE TO THESE COMMENTS.

DESCRIBE EFFORTS TO CONSULT WITH PERSONS OUTSIDE THE AGENCY TO OBTAIN THEIR VIEWS ON THE AVAILABILITY OF DATA, FREQUENCY OF COLLECTION, THE CLARITY OF INSTRUCTIONS AND RECORDKEEPING, DISCLOSURE, OR REPORTING FORM, AND ON THE DATA ELEMENTS TO BE RECORDED, DISCLOSED, OR REPORTED

An announcement was published in the Federal Register on November 15, 2013 (Federal Register Volume 78, No. 221, Page 68810). No substantive public comments that discussed burden and time were received.

Consultations outside the Agency

FNS has consulted with Colette Bounds, Mathematics Statistician at the National Agricultural Statistical Service (202-720-9189), Fran Thompson, Epidemiologist at the National Cancer Institute, National Institutes of Health (301-435-4410) and Ronette Briefel, Senior Fellow at Mathematica Policy Research (202-484-9220).

A.9 EXPLAIN ANY DECISION TO PROVIDE ANY PAYMENT OR GIFT TO RESPONDENTS, OTHER THAN REMUNERATION OF CONTRACTORS OR GRANTEES

No gifts or incentives will be provided to respondents in this revised data collection.

A.10 DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS AND THE BASIS FOR THE ASSURANCE IN STATUTE, REGULATION, OR AGENCY POLICY

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991 Volume 56, Number 80, and is located on pages 19078-19080 discusses the terms of protections that will be provided to respondents. Participants in this study will be subject to assurances and safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the privacy treatment of records maintained by a Federal agency according to either the individual's name or some other identifier.

The States and sites participating in this study will be notified that the information they provide will not be released in a form that identifies participants, except as otherwise required by law. No identifying information will be attached to any reports or data supplied to USDA or any other researchers.

Our contractor, [Abt Associates and their partner, Mathematica Policy Research] has extensive experience in data collection efforts requiring strict procedures for maintaining the privacy, security, and integrity of data. The following data handling and reporting procedures will be employed to maintain the privacy of survey participants and composite electronic files.

- All project staff, both permanent and temporary, will be required to sign a confidentiality and nondisclosure agreement (see Appendices D and E). In this agreement, staff pledges to maintain the privacy of all information collected from the respondents and will not disclose it to anyone other than authorized representatives of the evaluation, except as otherwise required by law. Field data collectors are required to carry their signed pledge with them at all times while in the field and may be required to show it to respondents. Issues of privacy are also discussed during training sessions provided to staff working in the project.

- While in the field, data collectors are required to store all completed forms, surveys, and material with identifying information on it in a locked car trunk. If the data collector is in the field for several days, forms and materials are shipped to the central office by Federal Express, UPS or other traceable shipping service. Regular mail is not used to ship any material containing respondent information. Field staff are also instructed to avoid making photocopies of such material.
- Once in the central office, documents containing respondent information are kept in locked files cabinets. At the close of the study, such documents are shredded.
- Data gathered from the interviews will be combined into master respondent files. Immediately after each file is created, it will be assigned a unique identification number. Any identifying information will be removed from the survey data and replaced with the identification number.

In addition, the evaluation contractor has established a number of procedures to ensure the privacy and security of electronic data in their offices during the data collection and processing period. Standard backup procedures will be implemented for the central office computer system to protect project data from user error or disk or other system failure. Backups and inactive files will be maintained on tape or compact disks. The system servers will be maintained inside a secure locked area accessible only to authorized systems personnel. Files will be accessible only by authorized personnel who have been provided project logons and passwords. Access to any of the study files (active, backup, or inactive) on any network multi-user system will be under the central control of the database manager. The database manager will ensure that the appropriate network partitions used in the study are appropriately protected (by password access, decryption, or protected or hidden directory partitioning) from access by unauthorized users. All organizations using data on study participants will maintain security, virus, and firewall technology to monitor for any unauthorized access attempts and any other security breaches.

Institutional Review Board

The contractor, Abt Associates, maintains its own Institutional Review Board (IRB), which serves as the organization's administrative body that conducts prospective reviews of proposed research and monitors continuing research for the purpose of safeguarding research participants' rights and welfare. All research involving interactions or interventions with human subjects is within the purview of the IRB.

A.11 PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR OR ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE. THIS JUSTIFICATION SHOULD INCLUDE THE REASONS WHY THE AGENCY CONSIDERS THE QUESTIONS NECESSARY, THE SPECIFIC USES TO BE MADE OF THE INFORMATION, THE EXPLANATION TO BE GIVEN TO PERSONS FROM WHOM THE INFORMATION IS REQUESTED, AND ANY STEPS TO BE TAKEN TO OBTAIN THEIR CONSENT

There are no personally sensitive questions to be asked during the qualitative interviews.

A.12 PROVIDE ESTIMATES OF THE HOUR BURDEN OF THE COLLECTION OF INFORMATION. THE STATEMENT SHOULD:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 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.**

Exhibit A.3 shows affected public, estimated number of respondents, estimated frequency of response, estimated annual responses per respondent, estimated burden and estimated annualized cost of respondent burden for the revised data collection. These estimates reflect consultations with program officials and the Agency's prior experience in collecting data. It has been calculated using average hourly earnings for May 2013 obtained from the Bureau of Labor Statistics' estimates for occupational employment wages.

Individuals and Households will not be contacted in this revised data collection request.

State Agency Reporting Burden								
Affected Public	**Activities/Requirements**	**Estimated # Respondents**	**Estimated Responses Annually per Respondent**	**Estimated Total Annual Responses (Col. bxc)**	**Estimated Annual Time per Response**	**Estimated Total Annual Burden Hours (Col. dxe)**	Estimated Hourly Rate	Total Cost
State Agencies	Primary Site Grantees – Implementation Study Interviews	13	1	5	1	5.00	$ 39.10	$ 195.50
	Primary School Districts - Implementation Study Interviews		1	8	1	8.00	$ 39.10	$ 312.80
SA Grand Total Reporting		**13**	**----**	**13**	**----**	**13.00**	**----**	$ 508.30
Business Reporting Burden								
Affected Public	**Activities/Requirements**	**Estimated # Respondents**	**Estimated Responses Annually per Respondent**	**Number of Total Annual Records**	**Estimated Time Per Record**	**Estimated Total Recordkeeping Hours**	Estimated Hourly Rate	Total Cost
Business Reporting Burden	EBT Vendors – SEBTC Transaction Data	5	1	5	0.5	2.50	$ 39.70	$ 99.25
Business Grand Total Reporting		**5**	**----**	**5**	**----**	**2.50**	$ 39.70	$ 99.25
Summary of SA & Business Grand Totals for Reporting		**Estimated # Respondents**	**Estimated Responses Annually per Respondent**	**Estimated Total Annual Responses**	**Estimated Annual Time per Response**	**Estimated Total Annual Burden Hours**	Estimated Hourly Rate	Total Cost
		18	**----**	**18**	**----**	**15.50**	**----**	**$ 607.55**

A.13 Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up 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 annualized maintenance costs associated with this data collection for respondents.

A.14 Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

Annualized Costs to Federal Government is $641,350.00. This includes the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The cost of the FNS employee, Social Science Research Analyst, involved in project oversight with the study is estimated at

GS-13, step 1 at $43.23 per hour based on 2,080 hours per year. We anticipate this person will work 520 hours per year for 3 years for a combined total of 1560 hours. The annual cost for this FNS employee over the course of this study is $22,480. The cost of the FNS employee, Branch Chief, involved in project oversight with the study is estimated at GS-14, step 1 at $51.09 per hour based on 2,080 hours per year. We anticipate this person will work 156 hours per year for 3 years for a combined total of 468 hours. The annual cost for this FNS employee over the course of this study is $7,970. The annual cost for both of these FNS employees over the course of this study is $91,350. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2014 for the Washington DC locality.

This Federal Cost also includes the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The cost to the Federal government for the all tasks associated with the Summer Electronic Benefits for Children (SEBTC) Demonstration is $550,000, as specified in the 2010 Agriculture Appropriations Act (P.L. 111-80), Section 749(g). This cost includes all study tasks, including design, pretests, sample selection, recruitment, information collection, analysis and report writing.

A.15 EXPLAIN THE REASONS FOR ANY PROGRAM CHANGES OR ADJUSTMENTS REPORTED IN ITEMS 13 OR 14 OF THE OMB FORM 83-1.

This is a revision collection of information. The current OMB burden inventory is 34,774. FNS is requesting 15.5 burden hours for this revised information collection request. This is a decrease of -34,758.5 burden hours as a result of program changes. In addition there is a decrease in the estimated total annual responses. The currently approved responses for this collection are 83,672 estimated total annual responses; with this revision, we are seeking approval for estimated total annual responses of 18. This will reflects a decrease of -83,654 total annual responses. These decreases are primarily due to the removal of individuals and households (I/H) that will not participate in this phase of the information collection request. There were 41,233 I/H respondents and non-respondents included in the prior clearance; again, there will be no re-contact with that affected public in this information collection request. Therefore, this is a decrease of -41,233 I/H respondents. There are also decreases to SA/SFA, 62 participated in the current collection and 13 will be contacted for this request. This program change reflects a decrease of -49 SA/SFA. The other affected public Business' also decreased. The current number of Business that participated in the current approval was 87; this phase seeks to contact 5, a decrease of -82 Business respondents. Consequently these program changes reflect a significant decrease in burden hours.

A.16 FOR COLLECTIONS OF INFORMATION WHOSE RESULTS ARE PLANNED TO BE PUBLISHED, OUTLINE PLANS FOR TABULATION AND PUBLICATION

Study Schedule

The schedule shown in Exhibit A.4 lists the expected period of performance for the data collection and reporting. Data collection plans are designed to provide timely data for the evaluation reports, including:

- *Demonstration (2014) Reports*:
  Final Congressional Status report completed April 15, 2015
  Final Evaluation Report completed June 15, 2015

Exhibit A.4: Schedule of Tasks and Deliverables

Task	Activity/Deliverable	Begin Date	End Date	Deliverable Date
1.0	**Data Collection/Analysis Plan**	**5/1/2014**	**5/31/2014**	
1.1	Revise Research Design – 2014 Update	5/1/2014	5/31/2014	
1.2	Revise 2014 Data Collection/Analysis Plan	5/1/2014	5/31/2014	
2.0	**Collect Data**	**6/15/2014**	**11/1/2014**	
2.1	Collect EBT transaction data*	6/15/2014	9/15/2014	
2.2	Collect Implementation Study data*	10/1/2014	11/1/2014	
3.0	**Analyze Data**	**11/15/2014**	**1/28/2015**	
3.1	Conduct implementation analysis	11/15/2014	1/15/2015	
3.2	Analyze EBT transaction data	10/1/2014	1/28/2015	
4.0	**Reports and Briefings**	**2/1/2015**	**6/30/2015**	
4.1	Draft Implementation Training Manual	2/1/2015	3/15/2015	3/15/2015
4.2	Final Implementation Training Manual	3/16/2015	4/15/2015	4/15/2015
4.3	Draft Evaluation Report on 2014 SEBT for Children Demonstrations	4/1/2015	5/15/2015	5/15/2015
4.4	Final Evaluation Report on 2014 SEBT for Children Demonstrations	5/16/2015	6/15/2015	6/15/2015
4.5	Annual briefing 1	5/16/2015	5/30/20115	5/30/2015
4.6	Annual briefing 2	6/16/2015	6/30/2015	6/30/2015
5.0	**2014 Documentation**	**7/1/2015**	**8/15/2015**	
5.1	Data files and documentation for Final Evaluation Report	7/1/2015	7/30/2015	7/30/2015
5.2	2014 Public Use Files	8/1/2015	8/15/2015	8/15/2015

*Data collection and interviews can only occur after OMB clearance has been obtained.

Analysis Plan

The main lines of analysis follow the broad research categories outlined in section A.1. Each of the research questions within these categories is explicitly or implicitly associated with one or more outcome measures to be analyzed. Our approach, including data sources for each question and the planned analyses are summarized in Exhibit A.1, above.

Analysis Methods

Tabulations and cross-tabulations: The descriptive research questions will be addressed by tabulations or cross-tabulations. For example, simple tabulations will be used to characterize overall SEBTC use of benefits. Cross-tabulations will be used to examine outcomes by site characteristics and other sub-groups. Tests of significant differences in levels of use across subgroups will be performed.

Publication of Study Results

The study's findings will be represented in two reports which will undergo peer review. The projected dates for these reports are presented in Exhibit A.4 (above).

A.17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

All data collection instruments (Appendix C) for the Food and Nutrition Service Evaluation of the Summer Electronic Benefits for Children Demonstration Projects will display the OMB approval number and expiration date.

A.18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this study.

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