

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

**Supporting Statement for
Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
Part A
(OMB Control Number: 0584-NEW)**

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**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

Table of Contents

PART A. JUSTIFICATION.....	3
1. Circumstances Making the Collection of Information Necessary.....	3
2. Purpose and Use of the Information Collection.....	4
3. Use of Information Technology and Burden Reduction.....	9
4. Efforts to Identify Duplication and Use of Similar Information.....	10
5. Impacts Small Businesses or Other Small Entities.....	10
6. Consequences of Collecting the Information Less Frequently.....	10
7. Special Circumstance Relating to the Guideline of 5 CFR 1320.5.....	10
8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency.....	10
9. Payment or Gift to the Respondents.....	10
10. Assurance of Privacy and Confidentiality Provided to Respondents.....	11
11. Sensitive Nature.....	12
12. Estimates of Hour Burden Including Annualized Hourly Costs.....	13
13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers.....	14
14. Annualized Costs to Federal Government.....	14
15. Explanation for Program Changes or Adjustments.....	14
16. Plans for Tabulation and Publication and Project Time Schedule.....	14
17. Reason(s) Display of OMB Expiration Date is Inappropriate.....	15
18. Exceptions to Certification for Paperwork Reduction Act Submissions.....	15

ATTACHMENTS

- Appendix A-1 Screen Shots of Online Survey Instruments
- Appendix B-1 SFSP Informational Brochure
- Appendix C-1 Data Management Security Protocols
- Appendix C-2 Confidentiality Agreement
- Appendix D-1 Deliverable Schedule
- Appendix E-1 State Survey Instrument
- Appendix E-2 State MOU
- Appendix E-3 State Survey Invite Email
- Appendix E-4 State Intro Letter
- Appendix E-5 State Reminder Text
- Appendix E-6 State Webinar
- Appendix E-7 State Webinar Save the Date
- Appendix F-1 Sponsor Survey Instrument
- Appendix F-2 Sponsor MOU
- Appendix F-3 Sponsor Survey Invite
- Appendix F-4 Sponsor Letter
- Appendix F-5 Sponsor Reminder Text

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

- Appendix F-6 Sponsor Webinar
- Appendix F-7 Sponsor Webinar Save the Date
- Appendix F-8 Sponsor Info First Request
- Appendix F-9 Sponsor Info Second Request
- Appendix G-1 Site Survey Instrument
- Appendix G-2 Site Survey Invite Email
- Appendix G-3 Site Letter
- Appendix G-4 Site Reminder Text
- Appendix G-5 Site Info Request
- Appendix H-1 Parent, Caregiver Interview Guide—Nonparticipants
- Appendix I-1 Parent, Caregiver Interview Guide—Participants
- Appendix I-2 Parent Intro Letter
- Appendix I-3 Parent Thank You
- Appendix I-4 Parent Info Insert
- Appendix I-5 Parents Informed Consent
- Appendix J-1 FNS Regional Letter
- Appendix K-1 Participant Reminder
- Appendix L-1 School District Letter
- Appendix L-2 School District Thank you
- Appendix M-1 Comments from John Richards, Mathematical Statistician NASS

PART A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This collection is a new data collection effort. School-age children are more susceptible to food insecurity during the summer when they do not have access to meals provided at school. The Summer Food Service Program (SFSP) was designed to ensure that children who benefit from the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) do not experience a nutrition gap during the summer. The SFSP supports children's nutrition through reimbursements to participating institutions for meals meeting USDA Dietary Guidelines for Americans, 2015. The SFSP is operated in all 50 states, the District of Columbia, Guam, Puerto Rico, and the U.S. Virgin Islands, delivered through grants to the states, and usually administered by the state Departments of Education. State-approved sponsors are responsible for operating the SFSP sites where meals are served, in addition to applying for SFSP funding at the state level, and purchasing or arranging for preparation of meals at the sites. Sites can be classified as: open, closed enrolled, camp, migrant, or National Youth Sports Program (NYSP). Open sites must be located in neighborhoods where at least half of children qualify for free or reduced-price school meals. At enrolled sites at least half of attending children must be eligible for free or reduced-price meals and the meals are served free only to enrolled children. Camp and NYSP sites serve free meals to the specific children enrolled in their respective programs. Migrant sites serve the children of migrant workers, and can qualify for SFSP reimbursement by gaining certification from migrant service organizations.

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

Due to the large gap in participation levels between the NSLP and the SFSP and despite ongoing efforts to increase participation, the SFSP only reaches a small fraction of all eligible children. Therefore, the U.S. Department of Agriculture (USDA) needs to obtain detailed information on SFSP operations and administration at the state agency, sponsor, and site levels, as well as characteristics and experiences of the providers, participants, and eligible nonparticipants. This study will evaluate the current operations of the SFSP. The findings and analyses of this study are intended to replicate and expand upon the last national study of the SFSP conducted in 2003. Since the 2003 study, (OMB Control #: 0536-0056; expired 05/31/2004) significant policy changes have been implemented that could affect participation in the program by children, sponsors, and sites. Therefore a key consideration for the design and data collection for this project is to collect sufficient data to update some of the results of the 2003 Economic Research Study/Mathematica Policy Research, Inc. (ERS/MPR) study¹, as well as to shed light on the effect of more recent policy developments affecting the SFSP. The importance of the current study is also highlighted by the limited administrative data at the national level on the operations of the SFSP at the state, sponsor, and site levels.

Programs under the legal authority of the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296, Sec. 305) must be evaluated by the research and evaluation arm (Office of Policy Support) of the U.S. Department of Agriculture (USDA). This information collection request falls within the mandates to conduct this evaluation study for the Summer Food Service Program.

¹ Feeding Low-Income Children When School Is Out: The Summer Food Service Program. Final Report, March 2003. Mathematica Policy Research, Inc. <http://www.mathematica-mpr.com/PDFs/feedinglow.pdf>

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

In 2010 the Government Accountability Office (GAO) published a report on the United States' domestic food assistance programs stating that the SFSP was not well studied and concluded that little was known about the program's effectiveness.

- 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.**

For What Purpose the Information Is To Be Used?

The USDA will use this new information collection to identify barriers and facilitators to program participation by sponsors, sites, and eligible children. FNS will use data to determine future changes in SFSP policy to improve program participation, operations and outcomes needed to address circumstances that may have changed since the last evaluation of the program in 2010.

The study is a process evaluation describing the operations of the SFSP at the state, sponsor, and site levels, in addition to participants' characteristics. Factors that contribute to differences in SFSP participation by children and sponsors across states are also of particular research interest. Furthermore, the study will collect data from the State, sponsor, and site levels to provide nationally representative results for the program participation outcomes at the national level. The research objectives of this study, which consider inputs, activities, and outputs of SFSP, are presented in Exhibit 1.

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

EXHIBIT 1. RESEARCH QUESTIONS

1. Describe how the SFSP operates at the state level.
<ul style="list-style-type: none"> ▪ What state agencies administer the SFSP, and what are the major tasks/roles of these agencies in the administration of the SFSP? ▪ What are the types and frequency of training offered to potential sponsors? ▪ What are the types and frequency of state sponsor recruitment and outreach activities? ▪ What factors are cited by the states for sponsors' exit from the SFSP? ▪ What are the special state requirements for sponsor application approval (e.g., sanitation)? ▪ How long does it take for sponsors to receive application approval?
2. Describe how the SFSP operates at the sponsor level.
<ul style="list-style-type: none"> ▪ What are the basic characteristics of sponsors (number of years as SFSP sponsors, total number of meals served annually, type of meals offered and prepared, and duration of the program in weeks)? ▪ What are the major types of sponsors, what proportion of sponsors are from each of these types, and what are the major tasks/roles of sponsors in the administration of the SFSP? ▪ How do sponsors feel about the sponsor application process and the requirements for approval? ▪ What are the types of training provided by the state for sponsors, how often are these trainings provided, and to what extent do sponsors feel the training was sufficient? ▪ What other child nutrition programs and other governmental programs do sponsors participate in during the year? ▪ How often do the sponsors monitor their respective sites? What are the common problems encountered during visits? ▪ How much of the costs do reimbursement rates cover? What are other sources of funding? How much of this is used on food?
3. Describe how the SFSP operates at the site level.
<ul style="list-style-type: none"> ▪ What are the basic characteristics of sites (location [urban/suburban/rural], setting [school/park/YMCA], and number of years as SFSP site)? ▪ What are the major types of sites in terms of the eligibility of participants (open, closed, residential camps) and purposes of the site (food only, sites that focus on other activities, etc.)? ▪ What are the major tasks/roles of site staff in the administration of the SFSP? ▪ How many sites offer activities, and what are the types of activities offered at sites? ▪ How many sites offer adult feeding programs? How many offer paid meal options? ▪ How long are sites open for the summer (as a percentage of the summer and as a number of weeks)? Are School Food Authority- (SFA-) operated sites open a shorter percentage of the summer compared to other sites? What are other differences between school and non-school sponsors in terms of basic characteristics? ▪ How many children does the site serve daily and over the summer? How does this number vary over time? ▪ How are SFSP meals (lunch and/or breakfast) prepared and served, and what types of foods do they contain? How often are they prepared and served? ▪ What are the types of training provided to the sites, and do they feel this training is sufficient? ▪ What is the frequency of approaches used to maintain food safety for SFSP meals?
4. Describe the characteristics of SFSP participants.
<ul style="list-style-type: none"> ▪ What are the demographic characteristics (age/grade, gender, race, and ethnicity) of SFSP participants? ▪ How often did SFSP participants usually receive NSLP lunches and SBP breakfasts during the prior school year?
5. Examine the differences in participation in SFSP and factors that affect participation by sponsors and children.
<ul style="list-style-type: none"> ▪ What are the methods currently used by states to calculate SFSP participation/average daily attendance (ADA)? Was this the same method used in calculating participation/ADA during the previous five years? ▪ How does using different methods to calculate SFSP attendance (i.e., July ADA; ADA for entire summer; May, June, and August ADA; or Operating Days ADA), NSLP attendance (i.e., March ADA or School Year ADA), and to adjust for area eligibility limitations affect SFSP participation rates? ▪ What factors do state, sponsor, site administrators, and staff cite to explain the differences in SFSP participation across states? What are the primary factors in the respective states? What factors explain why the program performs better in some parts of the state?

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

- How does the role of partners affect participation (e.g., how big a role the partners play in promoting the program or assisting sponsors with program implementation)?
- How do increased efforts of outreach and promotion at the national, state, and local levels affect participation?
- How does offering recreational and/or educational activities impact participation? What are the most frequent types of activities that attract kids to sites? What are common sources of additional funding that sites/sponsors use to pay for these activities?
- How does extending hours/days of operation affect participation? Does having earlier or later meal service impact participation?
- What do multivariate models suggest are the most important predictors of higher levels of SFSP participation?
- What other efforts are state and local program staff making to expand the number of sponsors/sites and increase participation levels among children?
- What efforts have state and local staff tried to expand SFSP participation but found ineffective, and why?
- What are the biggest problems or barriers encountered by the state with regard to increasing participation levels by both sponsors and children? What are the biggest facilitators for increasing participation levels by both sponsors and children? Are these factors within state control, or do they require policy changes?
- What portion of SFAs operate the SFSP during summer school sessions? Are non-school sponsors open most days of the week/most weeks of the summer? What are the barriers that prevent SFA and non-school sites from being open beyond the summer session, and are these barriers within state control or do they require policy changes?
- What are the most common responses for the reasons cited by participants and parents/caregivers on why they attend SFSP programs, how often they attend, what could improve their attendance, what are barriers and facilitators for their attendance, and how they heard about the program?

6. Examine changes in SFSP since the 2003 ERS/MPR Study.

- How many sponsors currently operate SFSP in each state, and how has this changed over time?
- How many sites per sponsor currently operate in each state, and how has this changed over time?
- What are the annual changes in the number of sponsors and sites across states since 2003?
- What are the annual changes in the number of meals served (by meal type and in total) and average daily attendance (ADA) across states since 2003?
- How have participant characteristics changed relative to the characteristics found in the 2003 ERS study?
- How have program characteristics (e.g., types of sponsors, types of sites, methods of food preparation) changed relative to the characteristics found in the 2003 ERS study?
- What has been the impact on SFSP of the Seamless Summer Option (SSO)?
- How many states do not have any SSO sponsors and why?
- Have problems and barriers to increasing participation cited by states, sponsors, and sites changed relative to those cited in the 2003 ERS study?

What information will be collected?

To address the research questions the study will collect administrative data and survey data. The administrative data obtained from the Food and Nutrition Service (FNS) for the number of sponsors, the number of sites, the number of meals, and the average daily attendance, by year 2003-2012 which is collected annually to update FNS' National Databank, will be used to address some research questions for research Objectives 1 and 2. Sampling lists of sponsors and sites obtained from states and sponsors will be used to develop the sampling frame of sponsors

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

and sites (discussed below). Basic information on sponsor and site characteristics will be used to address some research questions for research Objectives 1 and 2, as well as Objective 6 to provide comparisons with the ERS/MPR 2003 results.

The study will also collect survey data on SFSP operations and administration at the state, sponsor, and site levels, as well as characteristics of providers and program participation levels. Descriptive information on participants and eligible nonparticipants, their reasons for participation in SFSP programs, the frequency of their attendance at SFSP sites, factors that improve their levels of attendance, and effective methods of getting information about the program to them will also be assessed. The major research topics covered by state, sponsor, site, and parents/caregivers surveys are presented in Exhibit 2 (The surveys are attached in Appendix E-1, F-1, G-1, H-1 and I-1).

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

EXHIBIT 2. SURVEY RESEARCH TOPICS

RESEARCH TOPICS	Source of Information			
	States	Sponsors	Sites	Parents/ caregivers
State Level SFSP Operations				
Type and frequency of assistance to sponsors	X			
Type and frequency of recruitment/outreach activities	X	X		
Application approval time	X	X		
State-specific requirements for sponsor approval	X			
Factors associated with sponsors' exit from the SFSP	X			
Method currently used by the state to calculate participation	X			
Sponsor Level SFSP Operations				
Type of sponsors	X	X		
Number of years in the program		X	X	
Number of sites		X		
Total meals served annually and type of meals served		X	X	
Duration of SFSP program in weeks		X	X	
Major tasks/roles of staff in SFSP administration	X	X	X	
Subjective assessment of sponsor application process		X		
Subjective assessment of received training		X	X	
Participation in other child nutrition and other government programs	X	X	X	X
Frequency of site monitoring by sponsor		X		
Common problems encountered during monitoring		X		
Share of costs covered by reimbursement		X	X	
Other sources of funding		X	X	
Share of funds used on food		X		
Partners	X	X	X	
Participation levels in the Seamless Summer Option	X	X		
Site Level SFSP Operations				
Site geographic location (urban/rural)		X	X	
Site setting, type, purpose, and activities offered (if any)		X	X	
Adult feeding program and/or paid meal options offered		X	X	
Number of children served		X	X	
Mode of preparation/service of meals		X	X	
Ingredients used for meals			X	
Approaches to maintain food safety and frequency of their use			X	
Participant Information				
Age and/or school grade level of participants			X	X
Gender			X	X
Race/Ethnicity			X	X
Reasons for participation in SFSP program				X
Frequency of participation				X
Factors that would improve attendance levels	X	X	X	X
Barriers to, and facilitators of, attendance/participation	X	X	X	X
Sources that promoted the SFSP program	X	X	X	X

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

From whom will the information be collected?

To evaluate how program operations contribute to program participation at the state, sponsor, and site levels; to determine the factors affecting participation; and, to study characteristics of providers, participants, and eligible nonparticipants, a variety of information must be obtained. The survey data for this study will be collected from the total sample of 754 respondents specifically:

1. State agencies from all 54 states and territories², including Washington, D.C., Guam, Puerto Rico, and the U.S. Virgin Islands. The data collection will involve a self-administered web survey with state administrators of the agencies that operate the SFSP. The screen shots for the web surveys are presented in Appendix A-1.
2. Program staff from a nationally representative sample of 300 current SFSP sponsors, such as SFAs, government agencies, residential camps, National Youth Sports Camps, or nonprofit organizations. The data collection will involve a self-administered web survey. The screen shots for the web surveys are presented in Appendix A-1.
3. Site directors from a nationally representative sample of 350 sites. The data collection will involve a self-administered web survey. The screen shots for the web surveys are presented in Appendix A-1.
4. Twenty-five parents or caregivers of children participating in SFSP and 25 parents/caregivers of eligible nonparticipating children. The data collection will involve interviews over the telephone. The interview guides for the participant and nonparticipant surveys are presented in Appendix H-1 and I-1.

² <http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm>

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

How will the information be collected?

The data collection will involve web-based surveys. State, sponsor, and site respondents will also have the option of completing the survey over the telephone with operator assistance. It is anticipated that respondents will choose the option offering the lesser personal burden. Postcard and e-mail reminders will be sent to non-responding states, sponsors, and sites. The reminders are presented in Appendices E-5, F-5, G-4 and K1. Any remaining non-respondents will be contacted by telephone to remind them to participate. The survey can be provided in a hard copy format, at the respondents' option. Hard copies will be disseminated with pre-labeled and prepaid envelopes.

The parents/caregivers of participating children and eligible nonparticipants will be interviewed by phone. For this telephone data collection, the interviewers will use the paper version of the survey to record the responses. The participant and non-participant interview scripts are presented in Appendix H-1 and I-1.

How frequently will the information be collected?

The data collection will be conducted once.

Will the information be shared with any other organizations inside or outside USDA or the government?

The information collected in this study will be a valuable asset to policymakers; SFSP staff at the Federal, regional, State, local, and site levels, and the summer feeding/child nutrition research community. Policymakers and SFSP staff will use the findings to design and shape the programs

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

to ensure that participants' needs are being met. Summer feeding and child nutrition researchers will have an important data source to analyze and further contribute to the knowledge base regarding this high-risk, vulnerable population.

3. Use of Information Technology and Burden Reduction

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. Insert any applicable electronic web address.

The FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. The data collection will involve web-based surveys, which facilitate and streamline the collection of data. The web surveys screen shots with the web addresses and access credentials are presented in Appendix A-1. Web-based surveys are an effective, consistent, and accessible mode for data collection. They are a highly cost-efficient solution that provides critical information from respondents in real time and allows flexibility in the survey's format, layout, and navigation. The web-based surveys minimize the respondents' burden and improve data quality by providing skip patterns for questions that are not applicable, pop-up instructions to questions, an easy navigation, and an ability to stop and restart the survey at any time convenient to a respondent. It is expected that over 90% of state, sponsor, and site surveys will be collected electronically. State, sponsor, and site respondents will also have the option of completing the survey via telephone or a paper version of the survey. It is anticipated that respondents will choose the option offering the lesser personal burden, thereby minimizing the

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

overall burden of the study. The parents/caregivers of participating children and eligible nonparticipants will be interviewed by telephone using the paper version of the surveys.

Respondent burden will be minimized by the use of the web-based survey and professionally trained telephone interviewers, which will streamline the data-collection process. The web-based data collection will allow respondents to choose when to respond to the survey, preventing the interruption that might occur during telephone interviews. Furthermore, to reduce the burden, an introduction letter will outline the information that respondents might need to look up in their administrative records prior to participating in the survey. To further facilitate the ease of responding, during the reminder telephone calls to non-respondents, the interviewers will ask survey participants how to best support the survey completion (e.g., identifying best times to call back, most suitable person to speak to, and preferred data-collection mode). The reminder scripts are presented in Appendices E-5, F-5, G-4, and K-1.

The study will also rely on administrative data obtained from states and sponsors on their respective characteristics and program participation. These data will be submitted to the evaluation team via a secure File Transfer Protocol (FTP) site. To reduce the data collection burden, the respondents will be permitted to submit data in any format or form convenient for them. Each respondent will be provided a secure log-in to the FTP site to upload data. The use of administrative data will reduce the number of survey questions to be asked of the state, sponsor, and site staff. Burden will also be minimized by relying on administrative records for the data elements that are consistently available across the states, sponsors, and sites.

4. Efforts to Identify Duplication and Use of Similar Information

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

Because the last SFSP study was conducted by the FNS in 2003, most of the information collected is now outdated and does not reflect current SFSP policies, operations, and circumstances of the providers, participants, and nonparticipants. Although the study will use some of the survey items developed for the 2003 study, the results are likely to be different and should provide the USDA with the results of how the SFSP has changed over the past decade. The current study expands the research questions and the survey data to provide more detailed information on program operations and characteristics of the providers, participants and eligible nonparticipants than the data that were collected in 2003. The current study also involves different research questions, scope of work, and data collection instruments. As a result, the current study is considered as a new data collection effort.

5. Impacts Small Businesses or Other Small Entities

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

No small businesses will be involved in this information collection request.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The data collection will be conducted once. Without this study, the USDA will not be able to examine SFSP operations, administration, and providers' characteristics or identify facilitators and barriers to program participation by sponsors, sites, and eligible children. As a result, the USDA will not be able to determine future changes in SFSP policy and procedures to improve program participation and operations.

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;**

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

- **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 the guidelines in 5 CFR 1320.5.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside 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.

A 60 day Federal Register Notice (FRN) was published in the Federal Register on January 2, 2014 in Volume 79, No. 1, Page 92. There were no comments germane to this data collection.

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.

The study uses a panel of experts to identify and prioritize key research issues; develop and refine sampling, data collection, and methodological approaches; review survey instruments and protocols; and, validate and interpret findings. The advisory panel functions as an external team to review and provide guidance on the deliverables. The panel will continue to work with the study team throughout the SFSP evaluation, providing oversight and support to ensure quality and accuracy. The advisory panel is composed of four members from diverse disciplines, including sampling, program/school administration, survey methodology, food-security

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

programs, program evaluation, and social services. The contact information for these individuals is presented in Section B 5 of this document.

In addition to a panel of experts, the FNS consulted with John Richards, Mathematical Statistician from National Agricultural Statistics Service (NASS) (See Appendix M-1) at 202-720-3368 for expert consultation about the methodological approach the availability of data, the design, level of burden, and clarity of instructions for this collection. Dr. Laura Leete, at 503-362-8795 leete@uoregon.edu of the University of Oregon has been consulted on methodology and design. Shauna Sweet at 301-918-5088 shaunajsweet@gmail.com, is a statistician from the University of Maryland who has been consulting on the project for Optimal.

9. Explanation of Any Payment or Gift to the Respondents

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

Given the low response rates to surveys among low-income respondents, especially among program nonparticipants, to maximize the response rates among parents/caregivers of participants and eligible nonparticipants, it will be necessary to incentivize their participation. Underrepresentation of low-income and minority groups in research is well-documented³ and has been partially attributed to cognitive, cultural, socioeconomic, and historical factors⁴. Financial incentives are considered tokens of appreciation, have been reported to increase the response

³ Gibson, P. J. Koepsell, T. D., Diehr, P., Hale, C. (1999). Increasing Response Rates for Mailed Surveys of Medicaid Clients and Other Low-income Populations. *American Journal of Epidemiology*, 149, 11, 1057-1062.

⁴ Liu, S. T. Geidenberger, C. (2011). Comparing Incentives to Increase Response Rates among African Americans in the Ohio Pregnancy Risk Assessment Monitoring System. *Maternal Child Health Journal*, 15:527-533.

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

rates⁵ and to bring in more respondents from underrepresented groups^{6 7}. With respect to the amount of financial incentives, participation rates increase with the increasing value of the incentives, and tend to level off after \$20-\$30^{8 9 10}. Therefore, the study will utilize prepaid VISA cards in the amount of \$25 to show appreciation to 25 parents/caregivers of SFSP participants and 25 parents/caregivers of eligible nonparticipants.

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

Data will be reported only in a tabular form, with analysis cells large enough to prevent identification of individual agencies, organizations, sites or respondents. The surveys, interviews, and data files will not include identifying information, and respondents will be tracked using random number identifiers. Identifying information will be secured by the contractor and will only be released to the contractor's internal staff members who need it for survey data-collection operations and analyses (see Confidentiality Agreement Appendix C2). The introduction letters and the surveys contain the following statement: "The information you provide will be kept

⁵ Dillman, D. A. (2008). *Internet, Mail, and Mixed-Mode Surveys: The Tailored Design Method*. John Wiley and Sons, Inc., New York, NY.

⁶ Sánchez-Fernández, J., Muñoz-Leiva, F., Montoro-Ríos, F. J., Ibáñez-Zapata, J. A. (2010). An analysis of the effect of pre-incentives and post-incentives based on draws on response to web surveys. *Qual Quant.*, 44:357-373.

⁷ Dykema, J., Stevenson, J., Kniss, C., et al. (2011). Use of Monetary and Nonmonetary Incentives to Increase Response Rates among African Americans in the Wisconsin Pregnancy Risk Assessment Monitoring System. *Maternal Child Health Journal*, 16:785-791.

⁸ James, J. M. and Bolstein, R. (1992). Large monetary incentives and their effect on mail survey response rates. *Public Opinion Quarterly*, 56: 442-453.

⁹ Perez, D., Nie, J., Arden, C., et al. (2013). Impact of Participant Incentives and Direct and Snowball Sampling on Survey Response Rate in an Ethnically Diverse Community: Results from a Pilot Study of Physical Activity and the Built Environment. *Journal of Immigrant & Minority Health*, 15, 1, 207-214.

¹⁰ Erwin, W. J. and Wheelright, L. A. (2002). Improving mail response rates through the use of monetary incentives. *Journal of Mental Health Counseling*, 24:247-255.

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

private, and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law”.

The contractor (Optimal Solutions Group, LLC) utilizes data management security protocols to ensure restricted access to data and privacy of data maintained on its system and in its reports. Secure intranets are used to maintain project-related files, and secure servers use industry-standard methods such as firewalls, monitored access logs, virus protection, encrypted connections, password-protected accounts, and user authentication mechanisms to ensure the privacy responses. Optimal maintains a biometrically (physically) secure environment and employs a data security officer who oversees Optimal’s data. The security approach used to protect the restricted-use data (RUD) is based upon Defense in Depth principles. Security protections have been designed to address controls relative to people, technologies, and operations with technologies focused on defending the network/perimeter, the enclave, the computing environment, and the supporting structures. In general, the RUD enclave consists of a single web portal accessible only via a virtual private network (VPN) and remote desktop software. The server does not have access to the Internet, nor does it have public IP addresses open. Access is only granted via the secure VPN connection. The detailed description of data handling, storage and disposition, and the procedures for privacy safeguards and protection are presented in Appendix C-1 Data Management Security Protocols. Furthermore, all Optimal staff members are HIPAA compliance trained, with recertification completed every two years.

The FNS has unique confidentiality and privacy policies to provide protections to respondents. 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

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

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 the USDA or any other researchers.

11. Justification for Sensitive Questions 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.

States, sponsors, and sites' respondents will be asked to answer questions from the perspective of their respective agencies or organizations about particular aspects of SFSP operations, administration, and participation. Parents/caregivers of participants and eligible nonparticipants will be asked about their views of various aspects of the SFSP program and participating sites. The parents/caregivers surveys will not include questions about respondents' household incomes for sensitivity purposes.

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

The interviews will include questions about race and ethnicity to describe the children participating in the program and eligible nonparticipants. These questions are important to the FNS to describe the characteristics of diverse participants and eligible nonparticipants, their experiences and views of the program. The parents/caregivers will sign the informed consent form prior to participation in the interviews. The OMB Standards for the Classification of Federal Data on Race and Ethnicity are followed¹¹.

The standard USDA/ERS household food security measure will be administered to parents/caregivers of participants and eligible non-participants. This measure is essential for the FNS to gain a better understanding of the respondents' household food security issues, to contextualize and interpret the results of the interviews with parents, as well as to descriptively compare the households of participants and nonparticipants. Without this measure, it would be difficult to separate the issues of need, pride, resilience, and stigma. For example, some of the pretest respondents stated that they do not want to participate in the program because they are used to living with what they have, and want the program to be available for people who really need it.

12. Estimates of Hour Burden Including Annualized Hourly Costs

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

¹¹ <http://www.whitehouse.gov/omb/fedreg/ombdir15.html> and <http://www.whitehouse.gov/omb/fedreg/1997standards.html>.

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

The FNS estimates 2,552.74 hours are needed to conduct this study (See Exhibit 3). The Affected Public and Respondent Types for this data collection include: State agencies [State Administrators, Schools or School Food Authorities (SFAs)], Business for/not-for-Profit (sponsors), and parents/caregivers of participating and non-participating children.

The pretests were conducted for all data collection instruments for which OMB clearance is being requested. The objectives of the pretest were to evaluate: the ability of respondents to understand and respond to questions; difficulties remembering the information needed to answer questions; appropriateness of questions and response categories; missing questions or response categories; and length of time required to administer the survey instruments. The pretests were conducted with 19 respondents (two state administrators, six sponsors, six site supervisors, two parents/caregivers of the participants, and three parents/caregivers of eligible nonparticipants), thus, no more than 9 respondents were pretested on any one instrument. Given five different survey instruments, the sufficient pretest feedback for this information collection could not be obtained with the total of only 9 respondents.

Based on feedback obtained from pre-test respondents the instruments were revised by clarifying instructions, changing some of the questions, adding a few questions, modifying some response scales, and adding skip patterns to reduce the survey burden. In addition some questions were deleted or simplified to reduce the survey burden. Respondent burden for each data collection instrument is presented in Exhibit 3. Respondent burden was adjusted for data collection instruments based on the results of the pretest and the revisions to the instruments. The pretest survey responding took less than an hour for state administrators, sponsors, and site directors,

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

and 30 minutes for parents/caregivers of participants/non-participants (See Exhibit 3). No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping.

The estimates in the Exhibit 3 include: Memoranda of Understanding (MOUs), e-mail invitations, introductory letters, reminder texts, webinar activities, the time it takes to prepare for and complete the survey, as well as the time it takes to gather and obtain administrative records required for sampling. The main sources of burden are the collection of the administrative data for sampling, preparation for the survey, and the survey completion. The estimated burden for the collection of the administrative data for sampling will be as follows:

- State administrators: four hours to compile the lists of sponsors and sites;
- Sponsors: two and a half hours to compile the lists of sites;
- Two schools or SFA sites: two hours to compile the lists of participants and eligible nonparticipants (participating in school lunch or breakfast programs).

To prepare for and complete the surveys and interviews, the estimated burden will be as follows:

- State administrators: 45 minutes to prepare for, and an additional 45 minutes to complete the survey;
- Sponsor staff: 45 minutes to prepare for, and an additional 45 minutes to complete the survey;
- Site directors: 30 minutes to prepare for, and an additional 30 minutes to complete the survey;
- Parents/caregivers of participants: 30 minutes to complete the telephone interview;

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

- Parents/caregivers of eligible nonparticipants: 30 minutes to complete the telephone interview.

Exhibit 3, below, provides estimates of the data-collection burden for each of the five respondent groups for this study based on all contacts with the respondents and non-respondents. Therefore, the exhibit presents burden estimates for the number of contacts (10,338) and not the final sample size of 754 respondents (54 state administrators, 300 sponsors, 350 site directors, 25 parents or caregivers of participating children, and 25 parents or caregivers of eligible nonparticipating children). The sampling approach will use randomly selected replacements for non-respondents to achieve the desired sample size of 754.

Exhibit 4, below, provides estimates of the data-collection cost for participants and non-participants for each of the five samples for this study. The cost is based on the detailed burden estimates for respondents, non-respondents, and all contacts with the respondents and non-respondents calculated in the Exhibit 3. Based on the estimated burden of 2,552.74 hours, the estimated data-collection cost for the project is \$88,612.14.

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)**

EXHIBIT 3. REPORTING ESTIMATES OF HOUR BURDEN

Respondent Type	Instrument	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Non-Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Total Burden Hours
State Administrators	Survey pretest	2	1	2	1	2	0	1	0	0	0	2
State Administrators	Survey Instrument	54	1	54	1.5	81	0	1	0	0	0	81
State Administrators	MOU	54	1	54	0.167	9.018	0	1	0	0.167	0	9.018
State Administrators	Survey Invite Email	54	1	54	0.08	4.32	0	1	0	0.08	0	4.32
State Administrators	Intro Letter	54	1	54	0.08	4.32	0	1	0	0.08	0	4.32
State Administrators	Reminders	18	5	90	0.08	7.2	0	1	0	0.08	0	7.2
State Administrators	Webinar	45	1	45	1	45	9	1	9	0	0	45
State Administrators	Webinar Save the Date	45	1	45	0.05	2.25	9	1	9	0	0	2.25
State Administrators	Sponsors info request	54	1	54	4	216	0	1	0	0	0	216
State Agency Subtotal		54		0		371.11	9		0		0	371.11
Sponsors	Survey pretest	6	1	6	1	6	0	1	0	0	0	6
Sponsors	Sponsor Survey	300	1	300	1.5	450	33	1	33	0	0	450
Sponsors	MOU	300	1	300	0.167	50.1	33	1	33	0.167	5.511	55.611
Sponsors	Survey Invite	300	1	300	0.08	24	33	1	33	0.08	2.64	26.64
Sponsors	Sponsor Letter	300	1	300	0.08	24	33	1	33	0.08	2.64	26.64
Sponsors	Reminders	102	5	510	0.08	40.8	0	1	0	0.08	0	40.8
Sponsors	Webinar	250	1	250	1	250	50	1	50	0.05	2.5	252.5
Sponsors	Webinar Save the Date	250	1	250	0.05	12.5	50	1	50	0.05	2.5	15
Sponsors	Sites info request	300	1	300	2.5	750	0	1	0	0	0	750
Sponsor Subtotal		300		0		1607.4	50		0		15.791	1623.19
Site directors	Pretest	6	1	6	1	6	0	1	0	0	0	6
Site directors	Site Survey Instrument	350	1	350	1	350	39	1	39	0	0	350
Site directors	Survey Invite Email	350	1	350	0.08	28	39	1	39	0.08	3.12	31.12
Site directors	Site Letter	350	1	350	0.08	28	39	1	39	0.08	3.12	31.12
Site directors	Reminders	119	5	595	0.08	47.6	0	1	0	0.08	0	47.6
Site directors	Participants Info Request	2	1	2	2	4	0	1	0	0	0	4
Site Subtotal		350		0		463.6	39		0		6.24	469.84
Participants	Interview Guide	25	1	25	0.5	12.5	6	1	6	0	0	12.5
Participants	Pretest	2	1	2	0.5	1	0	1	0	0	0	1
Participants	Intro Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Participants	Thank You	25	1	25	0.08	2	0	1	0	0.08	0	2
Participants	Parent Info Brochure	25	1	25	0.167	4.175	6	1	6	0.167	1.002	5.177
Participants	Parent Inform Consent	25	1	25	0.167	4.175	0	1	0	0.167	0	4.175
Participants	FNS Regional Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Participants	Participation Reminder	14	10	140	0.08	11.2	0	1	0	0.08	0	11.2
Participants	School District Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Participants	School Thank Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Non-participants	Interview Guide	25	1	25	0.5	12.5	6	1	6	0	0	12.5
Non-participants	Pretest	3	1	3	0.5	1.5	0	1	0	0	0	1.5
Non-participants	Intro Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Non-participants	Thank You	25	1	25	0.08	2	0	1	0	0.08	0	2
Non-participants	Parent Info Brochure	25	1	25	0.167	4.175	6	1	6	0.167	1.002	5.177
Non-participants	Parent Inform Consent	25	1	25	0.167	4.175	0	1	0	0.167	0	4.175
Non-participants	FNS Regional Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Non-participants	Participation Reminder	14	10	140	0.08	11.2	0	1	0	0.08	0	11.2
Non-participants	School District Letter	25	1	25	0.08	2	0	1	0	0.08	0	2
Non-participants	School Letter Thank	25	1	25	0.08	2	0	1	0	0.08	0	2
Parents and caregivers Subtotal		50		685		86.6	12		0		2.004	88.60
GRAND TOTAL		754		10338		2528.71	110		855		24.035	2552.74

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)**

EXHIBIT 4. ANNUALIZED COST TO RESPONDENTS

Respondent Type	Instrument	Number of Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Number of Non-Respondents	Freq. of Response (annual)	Total Annual Response	Avg. Hours per Response	Total Annual Burden	Total Burden Hours	Average hourly wage rate	Total Annual Respondent Cost
State Administrators														
States	Survey pretest	2	1	2	1	2	0	1	0	0	0	2	\$43.70	\$87.40
States	Survey Instrument	54	1	54	1.5	81	0	1	0	0	0	81	\$43.70	\$3,539.70
States	MOU	54	1	54	0.167	9.018	0	1	0	0.167	0	9.018	\$43.70	\$394.09
States	Survey Invite Email	54	1	54	0.08	4.32	0	1	0	0.08	0	4.32	\$43.70	\$188.78
States	Intro Letter	54	1	54	0.08	4.32	0	1	0	0.08	0	4.32	\$43.70	\$188.78
States	Reminders	18	5	90	0.08	7.2	0	1	0	0.08	0	7.2	\$43.70	\$314.64
States	Webinar	45	1	45	1	45	9	1	9	0	0	45	\$43.70	\$1,966.50
States	Webinar Save Date	45	1	45	0.05	2.25	9	1	9	0	0	2.25	\$43.70	\$98.33
States	info request	54	1	54	4	216	0	1	0	0	0	216	\$43.70	\$9,439.20
State Agency Subtotal		54		0		371.11	9		0		0.00	371.11	\$43.70	\$16,217.42
Business for/not-for-Profit														
Sponsors	Survey pretest	6	1	6	1	6	0	1	0	0	0	6	\$35.94	\$215.64
Sponsors	Survey Instrument	300	1	300	1.5	450	33	1	33	0	0	450	\$35.94	\$16,173.00
Sponsors	MOU	300	1	300	0.167	50.1	33	1	33	0.167	5.511	55.611	\$35.94	\$1,998.66
Sponsors	Survey Invite	300	1	300	0.08	24	33	1	33	0.08	2.64	26.64	\$35.94	\$957.44
Sponsors	Sponsor Letter	300	1	300	0.08	24	33	1	33	0.08	2.64	26.64	\$35.94	\$957.44
Sponsors	Reminders	102	5	510	0.08	40.8	0	1	0	0.08	0	40.8	\$35.94	\$1,466.35
Sponsors	Webinar	250	1	250	1	250	50	1	50	0.05	2.5	252.5	\$35.94	\$9,074.85
Sponsors	Webinar Save Date	250	1	250	0.05	12.5	50	1	50	0.05	2.5	15	\$35.94	\$539.10
Sponsors	Sites info request	300	1	300	2.5	750	0	1	0	0	0	750	\$35.94	\$26,955.00
Sponsor Subtotal		300		0		1607.4	50		0		15.791	1623.19	\$35.94	\$58,337.48
Sites	Pretest	6	1	6	1	6	0	1	0	0	0	6	\$27.99	\$167.94
Sites	Survey Instrument	350	1	350	1	350	39	1	39	0	0	350	\$27.99	\$9,796.50
Sites	Survey Invite Email	350	1	350	0.08	28	39	1	39	0.08	3.12	31.12	\$27.99	\$871.05
Sites	Site Letter	350	1	350	0.08	28	39	1	39	0.08	3.12	31.12	\$27.99	\$871.05
Sites	Reminders	119	5	595	0.08	47.6	0	1	0	0.08	0	47.6	\$27.99	\$1,332.32
Sites	Info Request	2	1	2	2	4	0	1	0	0	0	4	\$27.99	\$111.96
Site Subtotal		350		0		463.6	39		0		6.24	469.84	\$27.99	\$13,150.82
Parents and Caregivers														
Participants	Interview Guide	25	1	25	0.5	12.5	6	1	6	0	0	12.5	\$10.23	\$127.88
Participants	Pretest	2	1	2	0.5	1	0	1	0	0	0	1	\$10.23	\$10.23
Participants	Intro Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Participants	Thank You	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Participants	Info Brochure	25	1	25	0.167	4.175	6	1	6	0.167	1.002	5.177	\$10.23	\$52.96
Participants	Inform Consent	25	1	25	0.167	4.175	0	1	0	0.167	0	4.175	\$10.23	\$42.71
Participants	FNS Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)**

Participants	Reminder	14	10	140	0.08	11.2	0	1	0	0.08	0	11.2	\$10.23	\$114.58
Participants	School Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Participants	Thank Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Non-participants	Interview Guide	25	1	25	0.5	12.5	6	1	6	0	0	12.5	\$10.23	\$127.88
Non-participants	Pretest	3	1	3	0.5	1.5	0	1	0	0	0	1.5	\$10.23	\$15.35
Non-participants	Intro Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Non-participants	Thank You	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Non-participants	Info Brochure	25	1	25	0.167	4.175	6	1	6	0.167	1.002	5.177	\$10.23	\$52.96
Non-participants	Inform Consent	25	1	25	0.167	4.175	0	1	0	0.167	0	4.175	\$10.23	\$42.71
Non-participants	FNS Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Non-participants	Reminder	14	10	140	0.08	11.2	0	1	0	0.08	0	11.2	\$10.23	\$114.58
Non-participants	School Letter	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Non-participants	Letter Thank	25	1	25	0.08	2	0	1	0	0.08	0	2	\$10.23	\$20.46
Parents and caregivers Subtotal		50		685		86.6	12	0		2.004	88.604	\$10.23	\$906.42	
GRAND TOTAL		754		10338		2528.7	110	855		24.035	2552.74		\$88,612.14	

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

Note 1: \$43.70 - Based on average hourly wage for full-time “11-3011 Administrative Services Managers, state government” (<http://www.bls.gov/oes/2012/may/oes113011.htm>), “May 2012 National Occupational Employment and Wage Estimates United States” U.S. Department of Labor, Bureau of Labor Statistics, http://www.bls.gov/oes/2012/may/oes_nat.htm

Note 2: \$35.94 - Based on average hourly wage for full-time “11-9151 Social and Community Service Managers, Grantmaking and Giving Services”(<http://www.bls.gov/oes/2012/may/oes119151.htm>)

Note 3: \$27.99 - Based on average hourly wage for full-time “11-9151 Social and Community Service Managers, Community Food and Housing, and Emergency and Other Relief Services”(<http://www.bls.gov/oes/2012/may/oes119151.htm>)

Note 4: \$10.23 - Based on 2013–2014 income-eligibility guidelines for reduced-price meals for an individual; the U.S. Department of Agriculture, Food and Nutrition Service, http://www.fns.usda.gov/cnd/Governance/notices/iegs/IEG_Table-032913.pdf.

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

Provide estimates of the total annual cost burden to respondents or record keepers

resulting from the collection of information.

There are no other cost burdens to respondents or record keepers. There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

14. Annualized Costs to Federal Government

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

Annualized Cost to the Federal Government is \$451,415.93. 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

Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant Characteristics
(OMB Control Number: 0584-NEW)

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.

All costs for conducting the study are included in the contract between the USDA, the FNS, and Optimal Solutions Group, LLC, under the contract number AG-3198-C-13-0016. The total cost is \$1,262,899.00 from 08/30/13 through 08/30/16 to develop the study plan, data-collection instruments, recruitment materials, and the Office of Management and Budget (OMB) package, conduct data-collector selection and training, collect and analyze the data, prepare the final report, and conduct the briefing.

15. Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.

This project is a new collection of information as a result of program changes will add 2,636 burden hours to the OMB Burden Inventory.

16. Plans for Tabulation and Publication and Project Time Schedule

For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

This study will use both descriptive and inferential statistical techniques to analyze the data. The descriptive statistics will include frequency, percentages, averages, standard deviations, and ranges for the data elements. The inferential statistics will include univariate techniques, such as the t-test and chi-square test, as well as multivariate techniques, such as regressions, mixed models, and analyses of covariance. Standard errors and 95% confidence intervals will also be provided for the estimates. The analysis is expected to include tables for the descriptive statistics and graphical elements, such as frequency distribution graphs and box-and-whiskers plots. Other possible graphical elements include pie charts and maps in order to visually represent the data.

Data analysis will focus on providing the results addressing the established research questions. Exhibit 1 lists the research topics and the research questions to be addressed by the study. The analysis will determine the extent to which certain provider characteristics are related to program participation rates and examine the barriers and facilitators to program participation among providers, parents/caregivers of participants, and eligible nonparticipants.

The data will be collected on a one-time basis in 2015, beginning with collecting states' and sponsors' administrative records on May 1, 2015, followed by the survey data collection with states, sponsors, sites, and parents/caregivers of participants and eligible nonparticipants. The

**Supporting Statement for Evaluation of the Summer Food Service Program (SFSP) Participant
Characteristics
(OMB Control Number: 0584-NEW)**

data collection will be completed on November 12, 2015. The complete schedule for the project is attached in Appendix D-1 Deliverable Schedule.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

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

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act." of OMB Form 83-I. Part V "Certification Requirement for Paperwork Reduction Act." If Agency is not requesting an exception, the standard statement should be used.

There are no exceptions to the certification statement.