

**U.S. Department of Agriculture  
Food and Nutrition Service**

***Examination of Cash Nutrition Assistance  
Program Benefits in Puerto Rico***

AG-3198-C-14-0007

Request for Clearance  
Supporting Statement and  
Data Collection Instruments

*Part A: Justification*

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Project Officer: Robert Dalrymple  
Office of Policy Support  
3101 Park Center Drive, 10<sup>th</sup> Floor  
Alexandria, VA 22302  
(T) 703.305.2125 / (F) 703.305.2576  
Bob.Dalrymple@fns.usda.gov

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## **ATTACHMENT B: PRIVACY PLEDGE**

## **ATTACHMENT C: REVIEW BY THE USDA NATIONAL AGRICULTURAL STATISTICS SERVICE (NASS)**

- ATTACHMENT C.1: REVIEW BY THE USDA NASS
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## **ATTACHMENT E: COPY OF AUTHORIZING LEGISLATION**

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## **PART A. JUSTIFICATION**

### **A.1. Circumstances that Make Data Collection Necessary**

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

The Nutrition Assistance Program (NAP) is a critical Federal Government assistance program provided to low-income residents of Puerto Rico. Since July 1982, Puerto Rico has operated NAP from Federal funds received as a block grant. Under the block grant, which allowed Puerto Rico considerable flexibility in designing NAP, Puerto Rico replaced food coupons with 100-percent cash benefits, simplified administration, reduced funding levels, and placed a cap on annual funding. In late 2001, Puerto Rico developed an electronic benefit transfer (EBT) system and mandated that 75 percent of a household's monthly benefit be restricted to the EBT system for purchasing eligible food items at certified retailers. The remaining 25 percent of the monthly benefit may be issued in the form of cash to allow participants with limited access to certified retailers a way to purchase food.

In early 2014, Congress reauthorized the Food and Nutrition Act of 2008 in the Agricultural Act of 2014 (P.L. 113-79), commonly known as the 2014 Farm Bill, which included a provision for the gradual discontinuation of the cash portion of the NAP benefit until, by FY 2021, no benefits in the form of cash will be issued (Section 4025, see Attachment E). The legislation also required a review of NAP cash benefits in Puerto Rico, including the history and purpose of the cash portion, barriers to redeeming the non-cash portion, and usage of cash benefits for the purchase of non-food items. Additionally, it also required an assessment of the potential adverse effects of discontinuing the cash portion for both participants and retailers, and allows the Secretary of Agriculture to exempt participants or categories of participants if the

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review finds that the discontinuation of cash benefits is likely to have significant adverse effects. This study performs the required assessment of the cash portion of benefits received under NAP in Puerto Rico.

## **A.2. Purpose and Use of the Information**

**Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

The purpose of this information collection is to support a Congressionally mandated study to examine the role of the cash component of NAP benefits for key stakeholders (specifically NAP recipients and retailers) in Puerto Rico, and assess the potential adverse effects of discontinuing the cash benefit on both participants and retailers. The study was mandated under a provision of the Agricultural Act of 2014 (P.L. 113-79), commonly known as the 2014 Farm Bill.

The specific research objectives of this study include:

- Objective 1: Review the history and purpose of distributing a portion of monthly benefits in the form of cash
- Objective 2: Examine the barriers to the redemption of non-cash benefits by both program participants and retailers
- Objective 3: Examine the current usage of cash benefits for the purchase of non-food and other prohibited items
- Objective 4: Identify and assess the potential adverse effects of the discontinuation of cash benefits for both program participants and retailers

The information collected through the NAP participant survey, focus groups, retailer, CBO, and group residential facility interviews will include questions on the barriers to redemption, current usage of cash benefits, and adverse effect of discontinuing cash benefits to address objectives 2, 3, and 4. The results will be analyzed and presented alongside results from a literature and document review, an analysis of available U.S. Census data, and meetings with

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Federal and regional FNS and Administration for Socioeconomic Development of the Family (ADSEF) officials in Puerto Rico to address objective 1.

Information will be collected from NAP participants, NAP certified and uncertified retailers, community-based organizations (CBOs) and group residential facilities that serve NAP participants in Puerto Rico. This information will be gathered through 5 mechanisms: 1) a survey for NAP participants (up to 750 interviews), 2) a semi-structured in-person interview for both NAP certified and uncertified retailers (up to 30 interviews), 3) a focus group for NAP participants (up to 18 focus groups with 9 participants each for a total of 162 focus group participants), 4) a semi-structured in-person interview for directors of CBOs that work with NAP participants (up to 6 interviews), and 5) a semi-structured in-person interview for directors of group residential facilities where NAP participants live (up to 5 interviews). The survey instrument, which will be administered via telephone, is anticipated to take approximately 15 minutes. The semi-structured in-person retailer interviews are expected to last approximately 40 minutes. The focus groups are expected to last approximately 90 minutes. The semi-structured in-person CBO and group residential facility director interviews are expected to last approximately 1 hour. Data from the interviews will be analyzed as a whole to determine patterns among the group.

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### **A.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.**

The surveys of NAP participants will be conducted by computer-assisted telephone interviewing (CATI), which will maximize efficiency as well as consistency among interviews. This method offers an efficient way to reach a large number of respondents when the sampling frame is large and includes sufficient contact information. Although low-income populations may be prone to having disconnected or temporarily nonworking telephone numbers, the NAP participant telephone numbers in the sampling frame provided by ADSEF are expected to be up-to-date and accurate because ADSEF maintains current telephone information in order to conduct case management and recertification activities. If we find that telephone contact information is inaccurate, however, we will use standard locating procedures to identify a current phone number for the sample member.

The focus groups with NAP participants will be conducted in person, and will be held at local community-based organizations in the communities in which the NAP participants live. The semi-structured interviews with the certified and uncertified retailers will also be conducted in person at the retailer locations, and the semi-structured interviews with the CBO and group residential facility directors will also be conducted in person at the CBO or group residential facility locations. Due to the small scale of this information collection, in-person interviews and groups are more efficient.

The study will also use existing electronic data on NAP retailer store addresses, NAP participant data, and electronic benefit transfer (EBT) data to examine participants' geographic

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access to NAP retailers in the areas in which they live, and to examine participant redemption patterns by level of geographic access to retailers. It will not inform where they use the benefits withdrawn as cash, which will be the focus of the in-person interviews.

#### **A.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 purpose described in item 2 above.**

There is no similar data collection available. FNS has determined that no comprehensive efforts have been made to interview NAP participants or retailers, either by telephone or in person, to assess the role of the 25-percent cash portion of the NAP benefit and the potential impact of its discontinuance.

#### **A.5. Impacts on Small Businesses or Other Small Entities**

**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. In interviews with retailers, regardless of the retailer size, all efforts will be made to minimize the impact of the data collection by keeping the interviews at a reasonable length (40 minutes) and by scheduling data collection at times that are most convenient to the respondents. We anticipate that of the 30 retailer interviews, only one-third (10) will be held with small retailers.

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## **A.6. Consequences of Collecting the Information Less Frequently**

**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.**

No respondent will be asked to participate in more than one interview. If these surveys and interviews are not conducted, USDA will not have critical information needed to respond to the Congressionally-mandated study to assess how the cash portion of the NAP benefits are used, what types of items are purchased using the cash benefits, and the potential adverse effects of discontinuing the cash component on NAP participants and retailers in Puerto Rico.

## **A.7. Special Circumstances Relating to the Guideline of 5 CFR 1320.5**

**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 3 years**
- **In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use**
- **Requiring respondents to submit proprietary trade secret or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

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

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## **A.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.**

**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.**

### **1. Federal Register Notice and Comments**

A 60 day notice of emergency approval was published in the Federal Register on Friday, July 18, 2014, in Volume 79, Number 138, pages 41954-41957. No public comments were received regarding this notice at the time of this submission. Any comments received in response will be addressed and forwarded to OMB.

### **2. Consultations Outside of the Agency**

The data collection instruments were pre-tested externally to determine whether questions were written appropriately and whether they captured data most relevant to the research questions and objectives. Each pre-tester provided input to the research team about survey or interview content, including which questions, if any, were inappropriate and what questions should be included. This feedback was then used to refine and finalize the data collection instruments.

We also consulted with Jeff Bailey, from the Estimation, and Disclosure Methodology Branch at National Agriculture Statistics Service (NASS)/USDA (202-609-0901), who reviewed sampling and statistical methodologies. The review from NASS and our response to its comments are provided in Attachment C.

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## **A.9. Explanation of Any Payment or Gift to Respondents**

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

NAP participants who participate in the telephone survey will receive a \$10 gift card as a token of appreciation. The cards will be mailed to the respondents following the interview. NAP participants who participate in a focus group will receive a \$50 gift card at the end of the focus group as a token of appreciation. No payment or gift will be provided to retailers, CBO directors, and group residential facility directors who participate in the semi-structured interviews. The payment is consistent with the amount used in other studies of persons participating in food assistance programs.

## **A.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.**

Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy. The Privacy Act also provides for the confidential treatment of records maintained by a Federal agency according to either the individual's name or some other identifier.

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991, Volume 56, Pages 19078-19080 discusses the terms of protections that will be provided to respondents. All interviewees will also be assured that no individually identifiable information will be included with any response; every effort will be made during reporting to minimize the extent to which the identities of respondents can be inferred from the data by not specifying locations. Furthermore, the link between any response

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and any individuals will be secured by Insight in a locked (hard copy) or encrypted (computer) file and destroyed at the conclusion of the study pursuant to applicable USDA regulations.

All interviewers at Insight Policy Research (who will conduct interviews) and Ipsos data collection staff (who will conduct the NAP participant survey and moderate the focus groups) are required to sign a data privacy pledge associated specifically with this study. In this agreement, the staff pledges to maintain the privacy of all information collected from the respondents and to not disclose it to anyone other than authorized representatives of the study, except as otherwise required by law. Please see Attachment B for a copy of the data privacy pledge.

Consent forms that will be read to NAP retailers, focus group participants, and directors of CBOs and group residential facilities detailing the privacy of the data are provided in Attachment A.7. Respondents will be provided oral and written notification that their data will be treated as private and released to the public only in the form of aggregate study findings.

#### **A.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.**

The questions in the interview protocols and survey instrument are unlikely to be considered sensitive by respondents. There are no questions regarding race/ethnicity, religious beliefs, sexual attitudes or behavior, or other matters commonly considered as private. Before the in-person interviews take place, the field interviewers will review the consent form (found in Attachment A.8) with the participants. As part of the consent process, the interviewers will assure participants that they may choose not to answer any question(s), and their refusal to

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answer one or more questions will not affect their participant status nor disqualify them from receiving the token of appreciation.

## **A.12. Estimates of Hour Burden Including Annualized Hourly Costs**

**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.**

The burden estimates for respondents are shown in Table A.12.1. Overall burden is expected to be 639.43 hours. The information collection plan includes:

- **Telephone surveys with NAP participants:** Telephone surveys beginning with a sample of 1,000 NAP participants and resulting in 750 completed responses are estimated to have a total annual hour burden of 315.10 hours. The burden estimates assume an advance letter to 1,000 NAP participants at 0.05 hours each, a 40-percent response rate to an initial phone call to the 1,000 NAP participants (resulting in 400 completed surveys at 0.25 hours each, and 600 nonresponses at 0.05 hours each); a 35-percent response rate to the first follow-up phone call to the 600 nonresponses (resulting in 210 completed surveys at 0.25 hours each, and 390 nonresponses at 0.05 hours each); a 20-percent response rate to the second follow-up phone call to the 390 nonresponses (resulting in 78 completed surveys at 0.25 hours each, and 312 nonresponses at 0.05 hours each); and a 20-percent response rate to the third follow-up phone call to the 312 nonresponses (resulting in 62 completed surveys at 0.25 hours each, and 250 nonresponses at 0.05 hours each.)

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- **Focus groups with NAP participants:** Focus groups beginning with 396 NAP participants and resulting in 162 NAP participants (18 focus groups with 9 participants each) are estimated to have a total annual hour burden of 285.77 hours. The burden estimates assume an initial phone call at 0.083 hours each to 396 NAP participants asking them to attend a focus group with a 50-percent response rate (resulting in 198 individuals agreeing to come to the focus group). The estimates then assume follow-up information about the study will be sent to each of the 198 individuals at 0.05 hours each. The burden estimates then assume that 82 percent of the 198 NAP participants who agreed to come to a focus group will attend (resulting in 162 participants attending the focus group at 1.5 hours each, and 36 nonresponses at 0.0 hours each.) There is no burden for individuals who do not attend the focus group.

- **Semi-structured interviews with retailers:** Semi-structured interviews beginning with 30 certified and 30 uncertified retailers are estimated to have a total annual hour burden of 26.10 hours. With a target of 15 certified and 15 uncertified retailers, the burden estimates assume an advance letter to 30 certified and 30 uncertified retailers at .05 hours each, and a 50-percent response rate to a recruitment call to the 30 certified and 30 uncertified retailers at 0.05 hours per call. The burden estimates then assume that all 15 certified and uncertified retailers who agreed to be interviewed will participate and each interview is 40 minutes. The retailer interviews will be conducted on-site at the retailer location.

- **Semi-structured interviews with CBO directors:** Semi-structured interviews with 6 CBO directors are estimated to have a total annual hour burden of 6.8 hours. The burden estimates assume an initial phone call at 0.083 hours each to 6 CBO

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directors. The estimates then assume that FAQs about the study will be sent to each of the 6 individuals at 0.05 hours each. The estimates then assume a 1-hour interview with each of the 6 CBO directors. Because we are using local contacts who work with and know the CBO directors to recruit them, and because we are flexible with the time and schedules for the interviews, we assume that all 6 of the CBO directors will participate.

- **Semi-structured interviews with group residential facility directors:**

Semi-structured interviews with 5 group residential facility directors are estimated to have a total annual hour burden of 5.7 hours. The burden estimates assume an initial phone call at 0.083 hours each to 5 group residence directors. The estimates then assume that FAQs about the study will be sent to each of the 5 individuals at 0.05 hours each. The estimates then assume a 1-hour interview with each of the 5 group residence directors. Because we are using local contacts who work with and know the group residential facility directors to recruit them, and because we are flexible with the time and schedules for the interviews, we assume that all 5 of the residential facility directors will participate.

Table A.12-1 below illustrates the burden level.

**Table A.12-1. Total Burden Hours on the Public**

Respondent Type	Instrument	Attachment ID	Responsive						Nonresponse						Total Burden Hours
			Sample Size	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		
<b>NAP Participants (Telephone Survey)</b>															
NAP Participant	Advance letter/FAQs	A.6.1, A.6.2	1000	1000	1	1000	0.05	50.00	0	1	0	0	0.00	50.00	
	Survey-first call	A.1	1000	400	1	400	0.25	100.00	600	1	600	0.05	30.00	130.00	
	Follow-up phone call #1	A.1	600	210	1	210	0.25	52.50	390	1	390	0.05	19.50	72.00	
	Follow-up phone call #2	A.1	390	78	1	78	0.25	19.50	312	1	312	0.05	15.60	35.10	
	Follow-up phone call #3	A.1	312	62	1	62	0.25	15.50	250	1	250	0.05	12.50	28.00	
NAP Participant Survey Subtotal			1000	750	2.33	1750	0.14	237.50	250	6.21	1552	0.05	77.60	315.10	
<b>NAP Participants (Focus Groups)</b>															
NAP Participant	Focus group recruitment phone call/initial contact	A.8.4	396	198	1	198	0.083	16.43	198	1	198	0.083	16.43	32.87	
	Follow-up FAQs	A.6.2	198	198	1	198	0.05	9.90	0	1	0	0.05	0.00	9.90	
	Focus Group	A.2, A.7.1	198	162	1	162	1.5	243.00	36	1	36	0	0.00	243.00	
NAP Participant Focus Group Subtotal			396	162	3.44	558	0.48	269.33	234	1	234	0.07	16.43	285.77	
<b>NAP Participant Subtotal</b>			<b>1396</b>	<b>912</b>	<b>2.531</b>	<b>2308</b>	<b>0.220</b>	<b>506.83</b>	<b>484</b>	<b>3.690</b>	<b>1786</b>	<b>0.053</b>	<b>94.03</b>	<b>600.87</b>	
<b>Retailers (In-Person, Semi-Structured Interviews)</b>															
Certified Retailer	Advance letter/FAQs	A.6.3, A.6.2	30	30	1	30	0.05	1.50	0	1	0	0.05	0.00	1.50	
	Recruitment phone call	A.8.2	30	15	1	15	0.05	0.75	15	1	15	0.05	0.75	1.50	
	In-person interview	A.3.1, A.7.2	15	15	1	15	0.67	10.05	0	1	0	0	0.00	10.05	
Uncertified Retailer	Advance letter/FAQs	A.6.3, A.6.2	30	30	1	30	0.05	1.50	0	1	0	0.05	0.00	1.50	
	Recruitment phone call	A.8.2	30	15	1	15	0.05	0.75	15	1	15	0.05	0.75	1.50	

Respondent Type	Instrument	Attachment ID	Responsive						Nonresponse						Total Burden Hours
			Sample Size	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		
	In-person interview	A.3.2, A.7.2	15	15	1	15	0.67	10.05	0	1	0	0	0.00	10.05	
Retailer In-Person Subtotal			60	30	4	120	0.21	24.60	30	1	30	0.05	1.50	26.10	
Community-Based Organization (CBO) Directors (In-Person Semi-Structured Interviews)															
CBO Director	Recruitment phone call	A.8.1	6	6	1	6	0.083	0.50	0	1	0	0	0.00	0.50	
	FAQs	A.6.2	6	6	1	6	0.05	0.30	0	1	0	0	0.00	0.30	
	In-person interview	A.4, A.7.3	6	6	1	6	1	6.00	0	1	0	0	0.00	6.00	
CBO Director In-Person Subtotal			6	6	3	18	0.38	6.80	0	1	0	0.00	0.00	6.80	
Group Residential Facility Directors (In-Person, Semi-Structured Interviews)															
Group Facility Director	Recruitment phone call	A.8.3	5	5	1	5	0.083	0.42	0	1	0	0	0.00	0.42	
	FAQs	A.6.2	5	5	1	5	0.05	0.25	0	1	0	0	0.00	0.25	
	In-person interview	A.5, A.7.4	5	5	1	5	1	5.00	0	1	0	0	0.00	5.00	
Group Facility Director In-Person Subtotal			5	5	3	15	0.38	5.67	0	1	0	0.00	0.00	5.67	
Business Subtotal			71	41	3.73	153	0.24	37.07	30	1.00	30	0.05	1.5	38.57	
<b>Total</b>			<b>1467</b>	<b>953</b>	<b>2.58</b>	<b>2461</b>	<b>0.22</b>	<b>543.90</b>	<b>514</b>	<b>3.53</b>	<b>1816</b>	<b>0.05</b>	<b>95.53</b>	<b>639.43</b>	

Table A.12-2 below illustrates the estimated annualized cost to respondents for the hours of burden for this data collection. For NAP participants responding to the telephone survey, with a minimum hourly wage rate of \$7.25,<sup>1</sup> the total cost burden would be \$2,284.48. For NAP participants completing focus groups, with a minimum hourly wage rate of \$7.25, the total cost burden would be \$2,071.92. For retailers, with a median hourly wage of \$12.04,<sup>2</sup> the total cost burden would be \$314.24. For CBO directors, with a median hourly wage of \$17.88,<sup>3</sup> the total cost burden would be \$121.21. For group residential facility directors, with a median hourly wage of \$17.88, the total cost burden would be \$101.01. The table below depicts the maximum possible cost burden to the respondents.

**Table A.12-2. Annualized Cost to Respondents**

Type of Respondents	Type of Data Collection	Number of Respondents	Total Burden Hours	Hourly Wage Rate	Respondent Cost
NAP Participants	Telephone Survey	1,000	315.10	\$7.25 <sup>4</sup>	\$2,284.48
NAP Participants	Focus Groups	396	285.77	\$7.25	\$2,071.82
Retailers	In-Person Interview	60	26.10	\$12.04 <sup>5</sup>	\$314.24
CBO Directors	In-Person Interview	6	6.80	17.88 <sup>6</sup>	\$121.21
Group Residential Facility Directors	In-Person Interview	5	5.67	17.88	101.01
<b>Total</b>		<b>1467</b>	<b>639.43</b>	<b>NA</b>	<b>\$4,892.75</b>

1 Based on the minimum wage in Puerto Rico, retrieved from <http://www.dol.gov/whd/minwage/america.htm#PuertoRico>

2 Based on the median hourly wage for first-line supervisors of retailer sales workers in Puerto Rico, retrieved from [http://www.bls.gov/oes/current/oes\\_pr.htm#41-0000](http://www.bls.gov/oes/current/oes_pr.htm#41-0000)

3 Based on the median hourly wage for Social and Community Services Managers in Puerto Rico, retrieved from [http://www.bls.gov/oes/current/oes\\_pr.htm#11-0000](http://www.bls.gov/oes/current/oes_pr.htm#11-0000); occupation code: 11-9151

4 Based on the minimum wage in Puerto Rico, retrieved from <http://www.dol.gov/whd/minwage/america.htm#PuertoRico>

5 Based on the median hourly wage for first-line supervisors of retailer sales workers in Puerto Rico, retrieved from [http://www.bls.gov/oes/current/oes\\_pr.htm#41-0000](http://www.bls.gov/oes/current/oes_pr.htm#41-0000)

6 Based on the median hourly wage for Social and Community Services Managers in Puerto Rico, retrieved from [http://www.bls.gov/oes/current/oes\\_pr.htm#11-0000](http://www.bls.gov/oes/current/oes_pr.htm#11-0000); occupation code: 11-9151

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### **A.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, (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.**

No capital/startup or ongoing operational/maintenance costs are associated with this information collection.

### **A.14. Annualized Cost to Federal Government**

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

The cost to the Federal Government associated with the study design, instrument development, technical development of survey forms, information collection, analysis, reporting, and presentation/publication of the results is \$999,796. The information collection also assumes a total of 800 hours of Federal employee time for a GS-14 step 10 senior analyst at \$66.41 per hour for a total of \$53,128 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2014. The total project cost of the data collection is \$1,052,924.

### **A.15. Explanation for Program Changes or Adjustments**

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

This is a new collection of information effort that will add 639.43 burden hours and 4,277 annual responses to the OMB inventory as a result of program changes due to a new statute, Section 4025 of the Agriculture Act of 2014.

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## A.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.**

Survey data will be tabulated in SAS with results presented in tabular form appropriate to the data type with selected case characteristics. Data from focus groups, in-depth semi-structured interviews, and any open-ended survey questions will be recorded, transcribed, and analyzed using NVivo 10 software. Data from the survey, focus groups, and semi-structured interviews will be used for the purposes of this study only, and will not be shared with any other agencies or entities outside of USDA.

For in-depth interview analysis, the researchers will import a verbatim transcript of each interview into NVivo and will code the data using a standard coding scheme for each interview type. Although the coding schemes for different data collection types (e.g., interview, focus group, or survey question) may share many of the same themes, each will be coded separately to match the specific purposes of each data collection activity. The findings from the analysis will be reported in a final published report, which will be available to the public.

The schedule for data collection, analysis, and reporting is shown in Table A.16-1 below.

**Table A.16-1. Project Time Schedule**

<b>Activity</b>	<b>Expected Activity Period</b>
Develop and Test Data Collection Instruments	May - June 2014
Conduct Survey	September - November 2014
Conduct Focus Groups	September - November 2014
Conduct In-person Interviews	September - November 2014
Data Analysis	December 2014 - February 2015
Submit Final Report to USDA	July 2015

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

**If seeking approval not to 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 of OMB approval on all forms/questionnaires associated with this information collection.

### **A.18. Exceptions to Certification for Paperwork Reduction Act Submissions**

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

There are no exceptions to the certification statement.