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Part A: Justification

A.1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Child and Adult Care Food Program (CACFP) is a Federal program that provides meals and snacks in child and adult day care facilities. The objective of the *CACFP Sponsor and Provider Characteristics Study* is to provide the United States Department of Agriculture's Food and Nutrition Service (FNS), the Congress, advocates, and others interested in the CACFP with information that accurately describes the Program's current child care sponsors and providers. Section 305 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA, Public Law 111-296) requires CACFP sponsors and providers to cooperate with USDA program research and evaluation studies.

The CACFP has changed considerably since the last study was completed in 1997. Since then, there have been multiple legislative and regulatory actions, including the HHFKA, which changed the CACFP in a variety of ways affecting the characteristics of sponsors and providers. Even a cursory look at the available CACFP administrative data shows that the characteristics of sponsors, participating centers and family day care homes (FDCHs), and the children they serve are quite different. For example, in 1995, 42 percent of the children participating in the Program were in child care centers and 58 percent were in FDCHs. In contrast, by Fiscal Year (FY) 2012, 75 percent of the children were served in centers, while only 25 percent were served in homes.

This study will conduct a national survey of CACFP sponsors and providers that offers policy-makers, advocates, and the general public with up-to-date information about:

- Who is sponsoring child care providers;
- The type of training and technical assistance sponsors receive from their State CACFP Administering Agency;
- How often and what aspects of the program States monitor;
- How sponsors operate and manage the Program to ensure its integrity, as well as compliance with Federal and State regulations; and
- What types of providers sponsors serve.

Similarly, the study will provide up-to-date information on the characteristics of each type of child care provider participating in the Program and how they operate and administer the CACFP. It will examine:

- Days and hours of operation;
- Characteristics of the children served;

- The types of meals and snacks served to children;
- Staff training;
- Sponsor provided training and monitoring; and
- Providers' funding sources.

The *CACFP Sponsor and Provider Characteristics Study* focuses on the child care component of the program, which in FY 2012 included 21,063 institutions or sponsors and 180,937 child care providers.¹ These providers served 1,872 million meals/snacks to an average of 3.5 million children. About 81 percent of these meals/snacks were served to children living in households that had incomes below 185% of the Federal Poverty Level (FPL).

A.2 Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

This one-time data collection will begin on or about 03/09/15. The research questions that will be addressed by the *CACFP Sponsor and Provider Characteristics Study* will be answered by surveys of a *sample* of CACFP sponsors and their corresponding child care centers and family day care homes (FDCHs). The target population for this survey is *CACFP sponsors and all participating centers and FDCHs*.

Data Collection Package

Each sponsor and provider included in the study sample will be sent a package containing:

- An introductory letter from Kokopelli Associates;
- A customized brochure that:
 - Cites the FNS auspices for the study,
 - Provides an introduction to the study including objectives,
 - Describes the importance and statutory requirement of their participation,
 - Provides instructions for completing the survey, including a URL and personalized password for Internet access,
 - Assures privacy of responses, and
 - Provides a toll-free help line number and email address.
- Endorsement letters from the National CACFP Sponsors Association, the CACFP National Forum, and the CACFP National Professionals Association (sponsor package only); and
- A sponsor or provider questionnaire with return envelope.

¹ Child care providers participate in the CACFP under the umbrella of a sponsoring organization that assumes fiscal responsibility and provides training and monitoring to ensure that its providers comply with all of the CACFP regulations.

Instrumentation: Sponsor or Provider Questionnaires

Two questionnaires have been developed; one for sponsors and one for providers.² Hardcopy, web, and computer-assisted telephone interviewing (CATI) versions will be created for each instrument. All sponsors and providers will receive a paper version by mail with their initial invitation to participate in the study. Each package will include a return Business Reply Envelope, with postage paid.

Web Surveys

We anticipate that most responses will be submitted through the web version of the questionnaires. The surveys will take approximately 60 minutes to complete, and respondents may complete it over multiple sessions. The web survey will be hosted on a secure Westat server. A link to the survey will be included in the email sent to respondents, allowing respondents to simply click to access the web survey. Each survey will start on a screen that requires respondents to enter their assigned PIN code. PIN codes will be sufficiently long and non-sequential to minimize the possibility that anyone can guess or inadvertently enter a different PIN. PIN entry will be required each time a respondent accesses their survey online, and partially completed surveys will resume on the last screen completed.

Extensive in-house testing of the web-based surveys will be conducted to ensure that all skip patterns are set correctly and that all questions and response options display as intended. We will monitor the web survey throughout data collection to identify and track completed and partially completed web surveys.

Because of the serial nature of this data collection effort, it is important to distinguish questionnaires that are completed from those that are “partially completed” (i.e., submitted with some items not completed). We will follow-up with respondents that submit “partially completed” questionnaire to obtain missing data. We will consider questionnaires as completed if more than two-thirds of the items have been completed and exclude them from follow-up attempts.³

Two sets of questionnaires (i.e., sponsor questionnaires and provider questionnaires, see below) have been developed: one set for regular (i.e., non-at-risk) sponsors and regular providers, and a second set for at-risk sponsors and at-risk centers. Data collection is expected to begin about 03/09/15 and be completed by 6/22/15. Instruments are discussed below and are included as Appendix A.

² Minor variations in each of these instruments accommodate differences across different types of sponsors (child care center, Head Start center and family day care home sponsors), and different types of child care providers (child care centers, Head Start centers, and family day care homes).

³ Surveys often include partial completes in the survey respondent data instead of discarding them because they contain useful information for analysis, which would otherwise have been wasted. The cutoff of 2/3 is arbitrary but a number between 0.5 and 1 is usually used to determine the cutoff, and 2/3 represents a value reasonably higher than 0.5

Instruments: Main Study

The Main Study will collect detailed information on the characteristics of *all* CACFP sponsors and providers in the program's child care component (including at-risk centers and their sponsors⁴).

Sponsor Questionnaires. The Main Study will include separate instruments for each of the three types of CACFP sponsors: 1) sponsors of child care centers⁵; 2) sponsors of Head Start centers; and 3) sponsors of FDCHs. There is also a separate instrument for sponsors that sponsor more than one type of provider (e.g., centers and FDCHs, referred to as "mixed" sponsors). While these are technically four separate instruments, they contain essentially the same items with the wording of items tailored to reflect differences in the types of providers sponsored. The sponsor-level questionnaires address:

- General sponsor characteristics,
- Program administration and operations,
- Staffing and training,
- Monitoring of providers, and
- Sponsors' perceptions of the CACFP.

Provider Questionnaires. As in the case of CACFP sponsors, the Main Study will include separate instruments for each of the four types of CACFP providers: 1) independent child care centers; 2) sponsored child care centers; 3) Head Start centers; and 4) FDCHs. And, as with the sponsor-level instruments, the four provider-level instruments contain essentially the same items with the wording of items tailored to reflect differences among the four types of providers. The provider-level questionnaires address:

- Program size and the characteristics of children served,
- Program administration and operations,
- Staffing and training (centers only),
- Training and services provided by their sponsor (or State CACFP Agency for independent child care centers),
- Meal service characteristics,
- Program cost and funding sources,
- Providers' perceptions of the CACFP.

Instruments: At-Risk Study Component

The At-Risk Study Component will collect detailed information on the child care centers that participate in the afterschool at-risk component of the CACFP. The At-Risk Study Component will not replicate the data collection for the Main Study. Rather, it will focus on the types of centers and sponsors that participate in

⁴ The Main Study will not be stratified by at-risk status. At-risk centers and their sponsors will be represented in the Main Study sample approximately in proportion to their representation in the center and sponsor populations. The at-risk samples in the Main Study are too small to develop separate estimates with acceptable precision.

⁵ A provider-level instrument will be used for independent child care centers.

the afterschool at-risk component of the CACFP (as discussed in Section B.1 on the characteristics of *all* CACFP sponsors and providers, including at-risk centers and their sponsors⁶).

Sponsor Questionnaires. Since all children in Head Start centers are categorically eligible for free meals, these centers do not participate in the at-risk component of the CACFP and thus, these centers and their sponsors are not included in the at-risk component of the study. However, some center sponsors sponsor both centers that participate in the at-risk component and centers that do not participate. We refer to such sponsors as “mixed” *at-risk* sponsors and have developed a separate version of sponsor questionnaire for such sponsors in addition to the one for sponsors that will be used for sponsors that only sponsor at-risk centers. The at-risk sponsor questionnaires address:

- The types of organizations that sponsor centers for the at-risk component of the CACFP,
- Outreach and recruitment of centers to participate in the at-risk component of the CACFP,
- Assistance provided to centers to enroll in and meet the requirements of the at-risk component of the CACFP,
- Assistance/materials provided by their State CACFP Agency to facilitate their participation in the program,
- Challenges of sponsoring centers for the at-risk component of the CACFP,
- Additional assistance/materials they would like to receive from their State CACFP Agency, and
- Sponsors’ suggestions for improving the at-risk component of the CACFP.

Provider Questionnaires. Child care centers that participate in the at-risk component of the CACFP fall into two groups: 1) centers that only participate in the at-risk component of the CACFP; and 2) centers that provide “regular” child care to preschool children and/or before/afterschool care for school-age children, but also have an at-risk afterschool component. Separate instruments have been developed for each type of at-risk centers. The provider questionnaires address:

- Types of organizations that participate in the at-risk component of the CACFP,
- Operational characteristics (including participation in the Summer Food Service Program during summer months when school is not in session),
- Outreach and recruitment of children to participate,
- Meal service,
- Assistance/materials provided by their sponsor or State CACFP Agency to facilitate their participation in the program, and
- Centers’ recommendations for how sponsors and State CACFP Agencies can help ARCs improve the quality of the meals they serve.

⁶ The Main Study will not be stratified by at-risk status. At-risk centers and their sponsors will be represented in the Main Study sample approximately in proportion to their representation in the center and sponsor populations. The at-risk samples in the Main Study are too small to develop separate estimates with acceptable precision.

A.3 Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

The study complies with the E-Government Act of 2002 (P. L. 107-347) by giving all respondents an opportunity to use web-based surveys. By including programmed skip patterns, consistency and data range checks, this technology reduces data entry error that often necessitate callbacks to respondents to clarify the responses recorded by an interviewer using pencil and paper to conduct an interview. While all respondents will be given the opportunity to complete the surveys using the web, it is anticipated that approximately 60 percent of respondents will complete the web survey; 20 percent will complete the survey over the phone; and 20 percent will complete the survey on hard copy.

The study will use a single integrated database for all sponsor and provider surveys, regardless of the mode used to complete the survey. Telephone surveys will be conducted using a CATI version of the web survey. The CATI program will be based on the web survey and will share the same database to maintain data consistency. The common database will ensure that web completes are immediately removed from telephone contact efforts. Daily updates will close telephone cases when a complete mail survey is received. The CATI survey will begin by asking for the identified contact for each sponsor or provider sampled. Once data collectors confirm they are speaking to the correct person, they will read a custom introduction and then continue with interview questions.

A.4

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 provides the data needed to answer the study's research questions.

A.5 If the "

Information being requested or required has been held to the minimum required for the intended use. Although FDCHs and smaller centers and CACFP sponsors are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other provider and sponsor. Thus, they maintain the same kinds of information on file. HHFKA makes participation in evaluations of child nutrition programs such as the *CACFP Sponsor and Provider Characteristics Study* mandatory.

A.6

The data collection for the proposed study will be conducted once in 2015. Without this effort, FNS will not have the data necessary to address questions posed by Congress and program administrators.

A.7 Explain any special circumstances that would cause an information collection to be conducted in a manner:

- requiring respondents to report information to the agency more often than quarterly;
- requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- requiring respondents to submit more than an original and two copies of any document;
- requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;
- in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;
- requiring the use of a statistical data classification that has not been reviewed and approved by OMB;
- that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- requiring respondents to submit proprietary trade secrets, 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 other special circumstances; information collection is consistent with 5 CFR 1320.5.

A.8 If applicable, provide a copy and . . .

Federal Register Notice

An announcement (Appendix C) was published in the *Federal Register* (Volume 79, No. 81, Page 23317) on 04/28/2014, and specified a 60-day period for comment ending on 06/27/2014. Comments from consultants and public comments received by FNS and responses to those comments are included in Appendix D.

Consultations Outside the Agency

FNS has consulted with Andrew Dau of the USDA National Agricultural Statistics Service.

A.9

No payments, gifts or other remuneration will be paid to respondents.

A.10

CACFP sponsors and providers participating in this study will be assured that the information they provide will not be released in a form that identifies them. No identifying information will be attached to any reports or data supplied to USDA or any other researchers. The FNS survey contractors (Kokopelli Associates and Westat) will protect the privacy of all information collected for this study in accordance with the Privacy Act of 1974, except as otherwise required by law, and will not release, publish, or disclose nonpublic USDA information to unauthorized personnel.

In the study brochure respondents receive the following assurance that information will be kept private to the extent required by the Privacy Act:

“The study team will keep all information you provide private, to the full extent allowed by law, and will use the information only for the purposes of this study. The study team will not identify participating child care sites or sponsors in any publications or data files provided to the USDA.”

In the cover letter, which accompanies the questionnaires, respondents receive the following assurance of that information will be kept private to the extent required by the Privacy Act:

“Kokopelli Associates and Westat will not reveal the identities of participating CACFP providers to USDA/FNS. Information provided by each CACFP provider will be kept private, to the extent provided by law. Responses received from individual CACFP providers will be aggregated, and results will be reported only at the national level.”

Procedures to Ensure Privacy

The contractor has extensive experience in data collection efforts requiring strict procedures for maintaining the privacy, security, and integrity of data. The following data handling and reporting procedures will be employed to maintain the privacy of survey participants. All contractor staff will be required to sign the contractor’s confidentiality and nondisclosure agreement. In this agreement, staff pledge to maintain the confidentiality of all information collected from the respondents and will not disclose it to anyone other than authorized representatives of the study. Issues of privacy are also discussed during training sessions provided to staff working in the project.

- In the central office, documents containing respondent information are kept in locked file cabinets. At the close of the study, such documents are shredded.

- Data gathered from the interviews will be combined into master respondent files. Immediately after each file is created, it will be assigned a unique identification number. Any identifying information will be removed from the survey data and replaced with the identification number.
- Any respondent-identifying information will be contained in a master list to be created and protected in secure storage, to which only a limited number of project staff pledged to maintain privacy will have access.

In addition, files will be accessible only by authorized personnel who have been provided project logons and passwords. Access to any of the study files (active, backup, or inactive) on any network multi-user system will be under the central control of the database manager. The database manager will ensure that the appropriate network partitions used in the study are appropriately protected (by password access, decryption, or protected or hidden directory partitioning) from access by unauthorized users. All organizations using data on study participants will maintain security, virus, and firewall technology to monitor for any unauthorized access attempts and any other security breaches.

A.11 Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no sensitive questions contained in the data collection instruments.

A.12 Provide estimates of the hour burden of the collection of information. The statement should:

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Exhibit A.1 (attached) shows sample sizes, estimated burden, and estimated annualized cost of respondent burden for each part of the data collection and for all data collection. Estimated response times are based on response times for similar instruments used in previous studies of the CACFP. Annualized cost of respondent burden is the product of each type of respondent's annual burden and average hourly wage rate. As shown in the exhibit, the total estimated burden across all data collection components is 3,954 hours and the total annualized cost to respondents is \$87,950.

**Exhibit A.1
Estimates of Respondent Burden**

Affected Public	Data Collection Activity	Respondents	Hourly Wage Rate ²	Sample Size	RESPONDENTS					NON-RESPONDENTS					Total Annual Burden	
					Estimated number of respondents	Frequency of response	Total annual responses	Average burden (hours per response)	Sub-Total annual burden estimate (hours)	Estimated number of non-respondents	Frequency of response	Total annual responses	Average burden (hours per response)	Sub-Total annual burden estimate	Hours	Cost
Business-for-not-for-Profit	State Sample Frame Request Letter	State CACFP Agency Directors	\$38.72	23	23	1	23	2	46	0	NA	NA	NA	0	46	\$1,781
	Sponsor Sample Frame Request	CACFP Sponsor Directors	\$23.73	173	173	1	173	2	346	0	NA	NA	NA	0	346	\$8,211
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Independent Child Care Center Directors	\$22.38	250	200	1	200	1	200	50	1	50	0.17	9	209	\$4,677
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Child Care Center Sponsor Directors	\$23.73	220	200	1	200	1	200	20	1	20	0.17	3	203	\$4,817
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Head Start Center Sponsor Directors	\$23.73	300	270	1	270	1	270	30	1	30	0.17	5	275	\$6,526
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	At-Risk Afterschool Center Sponsor Directors	\$23.73	680	612	1	612	1	612	68	1	68	0.17	12	624	\$14,808
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Family Day Care Home Sponsor Directors ³	\$23.73	530	480	1	480	1	480	50	1	50	0.17	9	489	\$11,604
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Sponsored Child Care Center Directors	\$22.38	250	200	1	200	1	200	50	1	50	0.17	9	209	\$4,677
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Head Start Center Directors	\$22.38	340	270	1	270	1	270	70	1	70	0.17	12	282	\$6,311

Exhibit A.1 Estimates of Respondent Burden (continued)																	
Affected Public	Data Collection Activity	Respondents	Hourly Wage Rate ²	Sample Size	RESPONDENTS					NON-RESPONDENTS					Total Annual Burden		
					Estimated number of respondents	Frequency of response	Total annual responses	Average burden (hours per response)	Sub-Total annual burden estimate (hours)	Estimated number of non-respondents	Frequency of response	Total annual responses	Average burden (hours per response)	Sub-Total annual burden estimate (hours)	Hours	Cost	
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	At-Risk Afterschool Center Directors	\$22.38	1,058	812	1	812	1	812	246	1	246	0.17	42	854	\$19,113	
	• Recruitment letters, brochure • Self-Administered Web/Mail/ Telephone Survey	Family Child Care Providers	\$13.01	500	400	1	400	1	400	100	1	100	0.17	17	417	\$5,425	
Grand Total All Respondents¹					4,324	3,640	1	3,640	1.06	3,836	684	1	684	0.17	118	3,954	\$87,950

¹Detail may not sum due to rounding.

²Source: Bureau of Labor Statistics, National Occupational Employment and Wage Estimates, May, 2013. Available at http://www.bls.gov/oes/2013/may/oes_nat.htm.

³ Consistent with the FNS National Data Bank, Family Day Care Home Sponsor Directors includes directors of "mixed" sponsors that sponsor more than one type of provider (e.g., centers and FDCHs).

A.13 Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

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

A.14
Prov

The annualized government costs include the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The cost to the Federal government for all tasks is \$1,707,525. This information collection also assumes that a total of 120 hours of Federal employee time for a GS-13, step 1 at \$43.23 per hour for a total of \$5,188. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2014.

A.15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new collection of information that will add 3,954 burden hours to the OMB collection inventory due to program changes.

A.16 For collection

The majority of the analyses will be descriptive in nature and will include means, medians, standard deviations, frequency distributions and cross tabulations of key outcome measures. The analyses will include significance tests for subgroups for key outcome measures using t-statistics, chi-squared statistics and if needed, multivariate analyses such as OLS and logit regression analysis. Exhibit A.2 presents the study schedule.

Exhibit A.2 Data Collection and Reporting Schedule	
Data Collection and Analysis Task	Schedule
Assemble Sampling Frame, Select Sample, and Recruit SFAs	7/15/14 - 6/15/15
Select and Train Data Collectors	10/1/14 - 4/13/15
Data Collection	3/9/15 - 6/22/15
Create Analytic Database & Analyze Data	6/1/15 - 9/28/15
Prepare Study Reports	9/28/15 - 6/20/16
Prepare and Submit Data Files	6/20/16 - 9/19/16
Dissemination of Findings	6/20/16 - 9/19/16

A.17 If seeking

The agency plans to display the expiration date of OMB approval on all forms/questionnaires associated with this information collection.

A.18

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