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Department of
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Food and
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TO: Julie Wise
OMB Desk Officer

THROUGH: Ruth Brown
USDA Department Clearance Officer

FROM: Christina Sandberg Christina Sandberg
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Planning and Regulatory Affairs, Food and Nutrition Service

SUBJECT: Revisions to Supporting Statements for (0584-NEW): Child and Adult Care Food Program (CACFP) Sponsor and Provider Characteristics Study

This memo summarizes the major changes to Supporting Statements Parts A and B of the OMB Clearance Package (ROCIS version) in response to OMB's comments dated 02/25/15. Accompanying this memo please find the edited versions of Parts A and B in track changes, edited versions of Appendices B3, B4, and B5, an updated Exhibit A.1, and a new attachment (Appendix F) outlining the results of pretesting surveys. Thank you again for your feedback on the initial submission and for your consideration of these revisions. We hope that these changes address your concerns. We were hoping to have approval for the referenced study by March 23, 2015 so that we could complete data collection before July; if we cannot start data collection soon, we would either have to collect data in the summer months when attendance in the CACFP program drops and thus becomes less representative of typical operations, or we would delay data collection until the fall.

Part A

A2. 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
We have added a footnote explaining the use of 2/3 of the survey completed as the cutoff for considering the survey as a "complete."

A9. Explanation of any payment or gifts to respondents
We have changed our study plan and no longer propose to offer any payment or gifts to respondents. We have removed all references to incentives in Supporting Statement A, Supporting Statement B, and recruiting materials in Appendix B3 "Sponsor and Provider Recruitment Letters", Appendix B4 "Sponsor and Provider Brochures", and

Appendix B5 "Provider Recruitment Letter and Spanish Brochure".

A10. Assurances of privacy

We have added references to the Privacy Act. In addition we have inserted quotations of the privacy language included in the Study Brochure and the letter requesting participation in the study.

A12. Estimates of the hour burden of information collection

As discussed in B.3, we plan to request a limited amount of additional data for non-respondents and use these data to test for differences between respondents and non-respondents. As a result, the Respondent Burden Table (A.1) has been revised to include the time needed to get the information for the non-response bias analysis. The burden for non-respondents has been increased from 5 minutes (.08 hours) to 10 minutes (.17 hours). The total estimated burden thus increases slightly from 3,891 hours ($86,603) to 3,954 hours ($87,950).

Part B

B1. Collection of information employing statistical methods

We have added an explanation that by using the 50 States plus DC as the primary sampling units (PSUs) we have a list sample frame of PSUs that covers the entire universe of interest. We have also updated the population numbers cited in the text from FY 2012 to FY 2014 using the most recent NDB data available online. We also note that after selecting the sample of 23 States, we created a sample frame of sponsors and providers for each by contacting each State CACFP Agency to obtain a complete enumeration of all sponsors and providers participating in the CACFP in October 2014, which is the first month of the current program year (and, given month-to-month variation) is a month that FNS considers to be representative of the program year. In short, given the resources available for this study, using a list frame of states as PSUs that covers the entire universe at each of the three sampling stages is the most cost effective design. In addition, we have added a footnote explaining the use of 2/3 of the survey completed as the cutoff for considering the survey as a "complete."

B2. Describe procedures for the collection of information

The discussion of the sampling design is actually contained in Section B1, so in Section B2 we refer the reader to Section B1. We have added a discussion of the tradeoffs between the optimal sampling designs for each stage of sampling to the discussion in Section B1. In particular, we explained that a sample of 480 family day care home (FDCH) sponsors and 400 respondent FDCH providers is needed to obtain the desired level of precision for estimates of FDCH *sponsor-level* and provider-level characteristics, but because we expect an 80% response rate among FDCHs, we need an initial sample of 500 FDCH to obtain the desired level of precision for estimates of *FDCH characteristics*. Because we need to analyze some sponsor and provider variables together to answer some research questions, we have to select 500 FDCHs from the 480 respondent sponsors, which requires selecting 1 FDCH from 460 of the sampled sponsors and selecting 2 FDCHs from the other 20 FDCH sponsors. We want to select 2 FDCHs from each of the 20 largest FDCH sponsors in the sample rather than randomly selecting the 20 FDCH sponsors to increase the sampling efficiency by stabilizing the overall sampling probabilities of FDCHs selected from large sponsors.

B3. Describe methods to maximize response rates and deal with issues of non-response

We have added a discussion of the specific non-response bias analysis that we plan to use if the response rates are less than 80%. We plan to request a limited amount of additional data for non-respondents and use these data to test for differences between respondents and non-respondents. If differences are statistically significant, we will estimate the magnitude of the potential non-response bias after adjusting the sampling weights for non-response in each sampling stratum.

We have removed the reference to offering an incentive.

The Respondent Burden Table (A.1) has been revised to include the time needed to get the information for the non-response bias analysis. The burden for non-respondents has been increased from 5 minutes (.08 hours) to 10 minutes (.17 hours). The total estimated burden thus increases slightly from 3,891 hours ($86,603) to 3,954 hours ($87,950).

B4. Describe any tests of procedures or methods to be undertaken

We have added an explanation of why we did not pretest the web versions of the surveys. We indicate that web surveys are typically not programmed until the surveys (in paper form) have been approved. If we had pretested the web versions prior to submitting the Clearance Request to OMB, it would not have been possible to receive OMB approval in time to complete the Provider Surveys before the end of SY 2014-2015. The paper versions were pretested with a total of 9 respondents. A summary of the pretest results and changes that were made based on these results has been added as an appendix to the OMB submission (see Appendix F Summary of Findings and Recommendations from Pretest Cognitive Interviews). As you suggested, we have indicated that we will conduct extensive in-house testing of the web versions to ensure that the skip patterns are set correctly.

Lastly, we have updated the project officer information on each Supporting Statement to reflect the fact that a new Contracting Officer's Representative has been appointed for this project. Laura Zatz has replaced Allison Magness as Project Officer for this study.

If you have any questions or require any additional information, please contact me at Christina.Sandberg@fns.usda.gov.

Attachments
Supporting Statement Part A
Supporting Statement Part B
Appendix B3 "Sponsor and Provider Recruitment Letters"
Appendix B4 "Sponsor and Provider Brochures"
Appendix B5 "Provider Recruitment Letter and Spanish Brochure"
Exhibit A.1 Excel Burden Chart
Appendix F "Summary of Findings and Recommendations from Pretest Cognitive Interviews"