



tates
**United
Department
Agriculture**

Food and
Nutrition
Service

3101 Park
Center Drive
Alexandria, VA
22302-1500

TO: Julie Wise
OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget

THROUGH: Ruth Brown, OCIO Desk Officer
United States Department of Agriculture
Office of Chief Information Office

FROM: Rachelle Ragland-Greene and Christina Sandberg, Information Collection
Clearance Officers
Planning and Regulatory Affairs Office
Food and Nutrition Service

DATE: November 24, 2014

SUBJECT: Justification for Changes to the Summer Food Service Program
Characteristics Study, OMB # 0584-0595

Through this memorandum, we are requesting a non-substantive change to the burden estimates for the Summer Food Service Program (SFSP) Provider and Participant Characteristics Study, under the Information Collection Request (ICR), OMB Control No. 0584-0595, which was approved on August 19, 2014 and expires on August 31, 2016.

Since OMB approval was received, FNS has now determined that there is a need to increase the number of times that the State agencies will be contacted to provide lists of sponsors and sites. The current number of responses for administrative data is one. FNS plans to add two additional administrative data request from the 54 States.

These additional responses are necessary due to the fact that SFSP sites vary in duration and timing of operations during the summer, sampling frames must be updated throughout the summer in order to obtain a representative sample of sites. In addition, FNS discovered State deadlines for sponsor application and approvals range from April 8 to June 15, creating some challenges for obtaining administrative data and sponsor lists in a timely manner that does not miss the short window of operations for many SFSP sites. The initial data collection had planned for a multi-phase approach in which sponsor lists would be obtained from States and then lists of sites would be obtained from the sampled sponsors. However, this sequenced process would delay the sampling and data collection of sites until mid to late July, a time by which many SFSP sites have already ceased operations. In order to build sampling frames that represent all of the sites operating during the summer, the revised data collection plan seeks to obtain lists of sites from the States in:

- January 2015 (preliminary list of 2014 returning sites),
- Early summer 2015 (early operating sites for 2015), and

AN EQUAL OPPORTUNITY EMPLOYER

- Late summer 2015 (late operating sites for 2015).

Analysis of the 2014 list of sponsors and sites will enable FNS to construct a better sampling plan by helping to predict the distribution of 2015 sponsors and sites in terms of key characteristics such as location, duration, and timing of operations. The two different lists in summer 2015 will allow sampling of sites that operate in the early summer and those that are approved later. In the previously approved plan, the study sought to obtain sponsor contact information from sponsor training attendance lists; however, we now propose to use State administrative data from the two summer 2015 lists instead since it will be more accurate and more comprehensive. The addition of two administrative data requests from the States has led to slight adjustments in the timing of data collection activities.

FNS estimates that adding the two administrative data requests from the States into this study will result in a slight overall increase in the response and burden hour estimates. If the site data obtained from the State agencies in January 2015 is not sufficient, then FNS will contact the sponsors for the information about their sites as previously presented in the information collection request. Although it is unlikely that FNS will need to contact the sponsors (300) for the site administrative data, we have included that potential burden in this change request to acknowledge the possibility that we might need to request the data from sponsors. We increased the frequency of sponsor response from 1 to 2 responses, which gives us revised total annual responses of 600; this represents an increase of 300 total annual responses from sponsors. Additionally, the time per response for this activity decreased from 2.5 hours to 1.5 hours per response. The previously approved estimated burden for sponsors was 750 hours; the revised burden increased to 900 hours, a difference of 150 hours.

FNS plans to add two administrative data requests from the 54 States for a total of 162 responses annually, an increase of 108 responses. Originally we estimated the time per response at 4 hours; however, based on our reassessment, FNS now estimates that this time per response will decrease to 2.5 hours. Our proposed changes revise the burden for this activity from 216 to 405 hours, which is an increase of 189 burden hours.

Additionally, FNS has discovered a computational error in our site director's total annual responses. The original estimate was overreported at 6,685 total annual responses for this respondent group. We have made program adjustments to correct this line item to reflect 1,653 total annual responses for this target group, which reflects 5,032 fewer total annual responses (currently approved responses for site directors 6,685 -1,653 revised estimate for the total annual number of responses for site directors).

Burden	Responses	Hours
Currently Approved Burden	12,242	2,636
Proposed Change in Burden	-5,116	337
New Total Proposed Burden	7,126	2,973

The overall sampling design for the sponsors and sites will remain the same. However, the sampling will be conducted separately for states with different application and approval deadlines for sponsors and sites to ensure that early and late operating sponsors and sites are sampled with sufficient time for the data collection. These procedures will ensure that early and late operating sponsors and sites are included in the sample and will target the selection of a

total of 300 sponsors and 350 sites which remains unchanged from the original approval. Attached is a copy of the revised Supporting Statement Part B showing the proposed changes to the sampling design.

Lastly, as a result of the changes outlined above, we have made minor edits to previously approved recruitment materials for:

- State Agencies (see Appendix E4 State Intro Letter and Appendix E7 State Webinar).
- Appendix B1 State Informational Brochure, formerly appendix B1 SFSP Informational Brochure. We have modified the format since the previous approval.
- We also customized the brochure for each respondent group—States, sponsors and sites--to help explain the study in a visually compelling way and entice participation (see Appendices B1, B2 and B3). The core content is very similar across the three versions of the document, however it is tailored slightly to highlight the respective time commitment and participation requested of each respondent type.

Thank you for your consideration of these requested non-substantive changes which will help ensure a more robust sampling and data collection approach.

Attachments

Supporting Statement Part A
Supporting Statement Part B
Appendix E4 State Intro Letter
Appendix E7 State Webinar
Appendix B1 State Informational Brochure (formerly Appendix B1 SFSP Informational Brochure)
Appendix B2 Sponsor Informational Brochure
Appendix B3 Site Informational Brochure