

**U.S. DEPARTMENT OF AGRICULTURE
FOOD AND NUTRITION SERVICE**

***Feasibility of Tribal Administration of Federal Nutrition Assistance
Programs***

*Request for Clearance
Supporting Statement and
Data Collection Instruments*

Part A: Justification

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TABLE OF CONTENTS

PART A: JUSTIFICATION.....	1
A.1. CIRCUMSTANCES THAT MAKE DATA COLLECTION NECESSARY.....	1
A.2. PURPOSE AND USE OF THE INFORMATION.....	1
A.3. USE OF INFORMATION TECHNOLOGY AND BURDEN REDUCTION.....	3
A.4. EFFORTS TO IDENTIFY DUPLICATION AND USE OF SIMILAR INFORMATION.....	3
A.5. IMPACTS ON SMALL BUSINESSES OR OTHER SMALL ENTITIES.....	4
A.6. CONSEQUENCES OF COLLECTING THE INFORMATION LESS FREQUENTLY.....	5
A.7. SPECIAL CIRCUMSTANCES RELATING TO THE GUIDELINE OF 5 CFR 1320.5.....	5
A.8. COMMENTS IN RESPONSE TO THE FEDERAL REGISTER NOTICE AND EFFORTS TO CONSULT OUTSIDE AGENCY.....	6
A.9. EXPLANATION OF ANY PAYMENT OR GIFT TO RESPONDENTS.....	8
A.10. ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS.....	9
A.11. JUSTIFICATION FOR SENSITIVE QUESTIONS.....	10
A.12. ESTIMATES OF HOUR BURDEN INCLUDING ANNUALIZED HOURLY COSTS.....	10
A.13. ESTIMATES OF OTHER TOTAL ANNUAL COST BURDEN TO RESPONDENTS OR RECORD KEEPERS.....	13
A.14. ANNUALIZED COST TO FEDERAL GOVERNMENT.....	14
A.15. EXPLANATION FOR PROGRAM CHANGES OR ADJUSTMENTS.....	14
A.16. PLANS FOR TABULATION AND PUBLICATION AND PROJECT TIME SCHEDULE.....	14
A.17. REASON(S) DISPLAY OF OMB EXPIRATION DATE IS INAPPROPRIATE.....	15
A.18. EXCEPTIONS TO CERTIFICATION FOR PAPERWORK REDUCTION ACT SUBMISSIONS.....	15

ATTACHMENT A: THE AGRICULTURE ACT OF 2014 (P.L. 113-79) SECTION 4004

ATTACHMENT B: FEASIBILITY STUDY SURVEY

ATTACHMENT B.1: ADVANCE NOTICE & INFORMATION SHEET

ATTACHMENT B.2: INVITATION TO PARTICIPATE

ATTACHMENT B.3: FOLLOW-UP NOTICE

ATTACHMENT B.4: SCREENSHOTS OF WEB SURVEY

ATTACHMENT C: FEASIBILITY STUDY INTERVIEW PROTOCOL

ATTACHMENT D: LITERATURE AND ORGANIZATIONS REVIEWED FOR DUPLICATE EFFORT

ATTACHMENT E: 60 DAY PUBLIC NOTICE

ATTACHMENT F: TRIBAL LEADERS CONSULTED FOR SURVEY CONTENT

ATTACHMENT G: NASS COMMENTS

ATTACHMENT H: DATA CONFIDENTIALITY PLEDGE

ATTACHMENT I: PUBLIC COMMENTS & FNS RESPONSE

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.

This is a new information collection request. In February 2014, Congress passed the Agriculture Act of 2014 (P.L. 113-79) which calls for a study to determine the feasibility of Tribal administration of Federal food assistance programs, services, functions, and activities, in lieu of State agencies or other administering entities. There are 15 nutrition assistance programs overseen by FNS and administered by states. States administer several of these programs with varying levels of shared responsibility with Tribal organizations. Section 4004(b)(3) of the Act directs the Food and Nutrition Service (FNS) to prepare a report which contains a list of programs and their related services, functions, and activities it is feasible for Indian Tribal Organizations (ITOs) to administer; a description of whether ITO administration would require statutory or regulatory changes; and such other issues that may be determined by the Secretary and developed through consultation with tribal organizations. See Attachment A for the text of Section 4004 of the Agriculture Act.

USDA's Food and Nutrition Service (FNS) is requesting approval from the Office of Management and Budget (OMB) to conduct a study of the Feasibility of Tribal Administration of Federal Nutrition Assistance Programs. This study contains two data collection activities: a multi-modal survey of Tribal leaders in all ITOs (approximately 1,132 individuals); and (b) in-person interviews with 2 Tribal Leaders and 6 program administrators at each of 16 ITOs. This data collection will be conducted only once during calendar year 2015. By statute, FNS must submit the report to Congress no later than August 2015.

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 evaluate whether there are Tribes that are both interested and equipped to take over administration of Federal nutrition assistance programs from their States. IMPAQ researchers will analyze existing legislation and regulations related to four programs identified by FNS: The Supplemental Nutrition Assistance Program (SNAP), the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and the Summer Food Program. Researchers will verify their findings with national and regional FNS staff members (all federal staff not subject to OMB approval). This phase of the research will produce a comprehensive picture of the capacity needed to meet FNS program requirements. IMPAQ will then collect data from Tribal leaders and ITO program administrators to verify their interest in administering any of the four programs (or components of those programs); and to determine whether there are ITOs with the necessary administrative capacity.

This new information collection includes multi-modal surveys (administered via mail, telephone, and Internet), and in-depth, semi-structured interview protocols that will be used to conduct interviews with Tribal leaders and program administrators (Attachments B and C, respectively). FNS expects the surveys to take approximately 30 minutes to complete. The interviews are anticipated to take approximately 90 minutes.

Specifically, the Feasibility Study will meet the following objectives:

- **Objective 1:** Identify services, functions, and activities associated with administering nutrition assistance programs.
- **Objective 2:** Consult with tribes to determine the extent of their interest in administering the programs.
- **Objective 3:** Assess the capability of ITOs to administer these programs based on the services, functions, and activities associated with administering them and ITO interest in administering all or part of particular programs,
- **Objective 4:** Identify statutory or regulatory changes, waivers, or special provisions that would be needed for ITOs to administer each nutrition program.

The information collected through the surveys and in-depth interviews will address Objectives 2 and 3. (Objectives 1 and 4 will use extant, public documents, and interviews with Federal FNS staff for which OMB clearance is not required.)

The surveys will be administered to the universe of ITOs. There will be no sampling. IMPAQ and FNS will purposively determine the site visit ITOs, where researchers will interview Tribal leaders and program administrators. The purposive sample will be based on early survey data and ongoing Tribal Consultations. Neither survey nor interview respondent groups are based on a statistical sample. Data from this collection are not intended to provide results generalizable to all ITOs. The results of this study will be used by FNS to report to Congress per the Agriculture Act of 2014 (P.L. 113-79), Section 4004(b) (3). FNS will use the results to inform next steps, which could include a demonstration program, legislative changes, or regulatory changes.

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.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. FNS will survey all ITO Tribal Leaders via mail, Internet, or telephone. Researchers will e-mail respondents an advance notice (Attachment B.1). This will be followed by an invitation to complete the survey (Attachment B.2), including link to the survey itself, delivered by both regular mail and e-mail. Non-respondents will be e-mailed and telephoned by researchers. Non-respondents will be offered the opportunity to complete the survey in any of the three modes: paper, web-based, or via telephone. In the latter case, a researcher will complete a web survey while asking each question of the respondent over the phone. FNS estimates that 50 percent of the surveys will be completed electronically (i.e., online).

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 prior or ongoing data collection being conducted that duplicates the efforts of the proposed data collection for the feasibility study. This research addresses a new set of specific questions related to Federal nutrition assistance programs. While this research is informed by prior or current work on the subject of Tribal administration of other programs, there is no research on the specific programs that will be examined in this Feasibility Study. This was determined using the following process: 1) consultation between the Office of Policy Support (SNAP Research and Analysis Division) and IMPAQ, 2) a search of key literature for recent research on Tribal administration of FNS programs, and 3) a review of current research activity at organizations that support Tribal governance/independence. The literature and organizations that were reviewed (some of which are cited below), are listed in Attachment D. Related items are discussed in the next paragraphs.

There have been a number of studies that focus on Native American participants in FNS and other benefits programs (Cole, 2002; Feingold et al. 2009; Westat, 2014). These generally describe the preference of Native American program participants to work with Tribally-run or Tribally-administered programming, for reasons including ease of enrollment and cultural compatibility. The proposed Feasibility Study does not duplicate any of this research, but is supported by it. While Tribes' desire for greater autonomy has spurred some research focused on Tribal operation of social programs (Hillbrandt & Rhoades, 2000; Hillbrandt et al., 2001; 2003; Sommers & Heiser, 2003) this focus has yet to include any nutrition assistance programs. FNS is confident that the proposed information collection is in no way duplicative of current or prior efforts.

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. All new data collection is with Tribal leaders and administrators.

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.

The information collection proposed for this study is designed to satisfy the Congressional mandate to report to Congress by August 2015. A one-time survey with a limited site-visit follow-up will produce the needed data to inform that report. If these data are not collected, USDA/FNS will not have critical information for assessing the feasibility of Tribal FNS program administration. Additionally, without this data collection, USDA/FNS will not be able to satisfy the Congressional mandate.

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. This one time collection of information will be conducted in a manner consistent with the guidelines in 5CFR 1320.6.

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.

a. Federal Register Notice and Comments

A 60-Day public comment notice required by 5CFR 1320.8(d) was published in the Federal Register on October 16, 2014 in Volume 79, Number 200, pages 62092 – 62094 (See Attachment E). FNS received comments from six members of the public. The issues raised in the public comments include:

1. Administration of food assistance programs in Indian Country is a very important issue for Tribal members and respective Governments.
2. The study needs to be sure to address the intent of the Congressional Mandate and provide Congress with information on the feasibility of Tribal Governments administering nutrition assistance programs and not the capacity.
3. The study needs to acknowledge existing Federal and Tribal legislative and administrative frameworks Tribal Governments use to administer various programs such as FDPIR, health, and education programs.
4. The study needs to include the voices and insight from Tribal leaders and administrators.
5. The study instruments should be culturally appropriate and sensitive to Tribes' confidentiality and less burdensome.

The following section outlines in brief FNS' response to the comments.

FNS Response to Federal Register Notice FNS-2014-0037-001 Public Comments

FNS has taken the following steps to address these comments throughout the progression of the study.

1. Draft instruments were shared with Tribal stakeholders for input and conference calls were held with Tribal stakeholders to discuss their input. Many of the comments outlined in the Federal Register Notice comments were raised by Tribal stakeholders and addressed in subsequent iterations of the data collection instruments, for example issues pertaining to cultural sensitivity and confidentiality.
2. FNS conducted pre-testing with Tribal stakeholders to refine and address any additional issues and concerns Tribal stakeholders may have had. In summary, the instruments focused on understanding current activities Tribes engage in the administration of their programs and their interest in administering nutrition assistance programs. Barriers to administration of Federal programs are also discussed in the instruments.
3. The data collected will be used to inform the feasibility of Tribes administering additional programs including nutritional assistance programs. Data collection instruments include Site Visit Interview guides. The study will include visits to up to 16 Tribes to discuss this Congressional mandate with Tribal leaders and other relevant staff identified by the Tribes.

Attachment I provides each comment. FNS provided a single response that addressed all comments. This is also provided in Attachment I.

b. Consultations Outside of the Agency

Several Tribal community members volunteered to review questions early in the instrument development phase (see Attachment F). The survey and site visit protocol incorporate the advice received. Specifically, an item that asked about staff education levels was removed, since volunteer reviewers uniformly found it offensive. Additional context was added to question introductions and transitions.

Each data collection instrument (survey and interview protocol) was then pre-tested externally with Tribal leaders or determine whether questions were written appropriately and captured data most relevant to the research questions and objectives. Eight individuals pre-tested the survey instrument, and five individuals pre-tested the interview protocol. These individuals are part of the survey universe and are potential site visit interviewees. As such, they provided input to the research team about the survey instrument and interview protocol, such as which questions were unclear or difficult to answer. As subject matter experts they could provide input on the content of the questions, including which questions should and should not be included. This feedback was then used to refine and finalize the data collection

instruments included in this package for OMB clearance. The Tribal leaders who advised us on the survey and interview protocol content are listed with contact information in Attachment F.

Additionally, consultation was provided by Audra Zakzeski of the USDA National Agriculture Statistics Service (Attachment G).

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.

Based on previous research with this population (Kim et. Al, 2008; Lavelle et. Al, 2009), FNS estimates a response rate of 20 percent. Survey respondents will be entered in a lottery to win one of 10 Visa™ gift cards, valued at \$200.00 each. Incentives are necessary (Edwards et. al, 2002; Kreuger, 1994)¹, due to the unique contribution required of the participant. But the large universe of respondents (n = 1,132) makes individual incentives impossible. Bowman Performance Consulting, part of the IMPAQ research team, has had positive results from using a lottery incentive in the Tribal context. For this reason, the lottery approach has been chosen as a viable alternative. Lottery incentives have been shown to make a significant difference in response rate (Laguilles et. al, 2011).²

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 personal identifier.

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports published in the Federal Register on April 25, 1991, Volume 56, Pages 19078-19080, discusses the terms of protections

¹ Kreuger, R. (1994). *Focus Groups: A practical guide for applied research, 2nd Ed.*, Thousand Oaks, CA: Sage Publications.

Edwards, P., Roberts, I., Clarke, M., DiGiuseppi, C., Pratap, S., Reinhard, W., & Kwan, I. (2002). Increasing Response Rates to Postal Questionnaires: Systematic Review. *BMJ* 324.

²

Laguilles, J., Williams, E., & Saunders, D. (2011). Can lottery incentives boost web survey response rates? Findings from four experiments. *Research in Higher Education*, 52, 537-553.

that will be provided to respondents. 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 States or locations. Furthermore, the link between any response and any individual will be secured by IMPAQ 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 IMPAQ International, LLC, Bowman Performance Consulting, and WMRA are required to sign a data confidentiality pledge (Attachment H) 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.

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 on any of the data collection instruments regarding race/ethnicity, disability, religious beliefs, sexual attitudes or behavior, or other matters commonly considered as private (including individual income, asset holdings, or participation in needs-based assistance programs). It is possible that some respondents will be sensitive about being asked for their Tribal affiliation, or uncomfortable answering some of the questions regarding their perceptions of the Tribe's administrative capacity. However, based on our interactions with members of ITOs to date, we anticipate very few, if any issues. Respondents will be informed that they may choose not to answer any specific questions and, as noted in A.10 above, that responses will be treated as private.

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.**

The burden estimates for respondents are shown in Table 1. The information collection plan includes surveys distributed to two Tribal leaders per 566 Federally-recognized Tribes for a total of 1,132 surveys. Surveys will take 30 minutes to complete. We have also calculated a non-response time for the survey of two minutes. An additional 7 minutes has been added, to account for the advance notice and information sheet (Attachment B.1) and the invitation (Attachment B.2). Approximately 181 (80% of the target 226 survey respondents) will each receive 3-5 follow-up attempts via e-mails/phone calls

(Attachment B.3). Table 1 also includes interviews in 16 ITOs with Tribal leaders (two per ITO) and program administrators (up to six per ITO). We expect in-depth interviews to take 1.5 hours to complete, as determined through pre-tests of the protocol. An additional 0.5 hours per interviewee has been factored in (for a total of 2 hours per interviewee), to account for a general discussion of Tribal history. We also estimate 2 hours per site for one of the program administrators to cover pre-visit activities: Confirming basic information about the Tribe, preparing for the visit, and coordinating the participation of their staff. The burden estimates have been determined based on the IMPAQ team's knowledge of working with this population. The *total* number of Tribal leaders participating in the research is 226 (20% of the total population of 1,132 individuals). Tribal leaders with whom IMPAQ pretested the survey, as well as leaders who will participate in site visits are assumed to be part of this group of 226 individuals. Similarly, the *total* number of Tribal administrators is 96 (6 administrators at 16 site visit locales). The 16 individuals who will assist researchers in collecting administrative data are assumed to be among the 96 visit participants. Therefore, the total number of participants in this research is 226 Tribal leaders plus 96 Tribal administrators, or 322 individuals.

Table 1
Total Burden on the Public

Respondent Category	Type of respondents	Instruments	Sample Size	Responsive					Non-Responsive					Grand Total Annual Burden Estimate (hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden
				Number of respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)	Number of Non-respondents	Frequency of response	Total Annual responses	Hours per response	Annual burden (hours)			
State, Local Tribal	Pre-Testing	Survey	8	8	1	8	1.50	12.0	0	1	0	0.00	0.0	12.0	\$ 52.98	\$ 635.76
	Pre-Testing	Interview	5	5	1	5	1.50	7.5	0	1	0	0.00	0.0	7.5	\$ 52.98	\$ 397.35
	Tribal leaders	Survey	1,132	226	1	226	0.500	113.0	906	1	906	0.03	27.2	140.2	\$ 52.98	\$ 7,426.74
	Tribal leaders	Advance Notice, Information Sheet, Invitation	1,132	226	1	226	0.117	26.4	906	1	906	0.00	0.0	26.4	\$ 52.98	\$ 1,396.91
	Tribal leaders	Follow-up 1	181	90	1	90	0.067	6.0	90	1	90	0.00	0.0	6.0	\$ 52.98	\$ 319.29
	Tribal leaders	Follow-up 2	90	54	1	54	0.067	3.6	36	1	36	0.00	0.0	3.6	\$ 52.98	\$ 191.58
	Tribal leaders	Follow-up 3	36	14	1	14	0.067	1.0	22	1	22	0.00	0.0	1.0	\$ 52.98	\$ 51.09
	Tribal leaders	Follow-up 4	22	16	1	16	0.067	1.1	6	1	6	0.00	0.0	1.1	\$ 52.98	\$ 56.20
	Tribal leaders	Follow-up 5	6	5	1	5	0.067	0.3	1	1	1	0.00	0.0	0.3	\$ 52.98	\$ 17.66
	Tribal leaders	Site Visit - Interview	32	32	1	32	2.000	64.0	0	1	0	0.00	0.0	64.0	\$ 52.98	\$ 3,390.72
	Tribal Admin	Site Visit - Interview	96	96	1	96	2.000	192.0	0	1	0	0.00	0.0	192.0	\$ 22.24	\$ 4,270.08
	Tribal Admin	Administrative Data Collection	16	16	1	16	2	32	0	0	0	0.00	0.0	32.0	\$ 22.24	\$ 711.68
				1,228	322	2.45	789	0.582	459	906		1,967		27.2	486.05	-

“Administrative Data” refers to any supporting documents Tribal administrators may provide during the site visit, for example, Policy and Procedures documentation.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 1 above illustrates the estimated annualized cost to the public (including those considered responsive and nonresponsive) for the hours of burden for this data collection. The wages in Table 1 are based on those reported by the Department of Labor's Bureau of Labor Statistics for NAICS code 999200: State government, excluding schools and hospitals. The chief executive wage (\$52.98) was used for Tribal leaders. The community and social services specialist wage (\$22.24) was used for program administrators.

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 13-month contract cost to the Federal Government is a fixed price award, valued at \$899,579. This total includes costs associated with the study design, instrument development, technical development of survey forms, information collection, analysis, reporting, and presentation/publication of the results. Of that total, approximately \$749,621 will be used for data collection, including pre-tests, supporting documents volunteered by Tribal Leaders during site visits, in-person interviews, Web and telephone surveys, and QC re-reviews. The period of performance for the project is July 21, 2014 through August 15, 2015.

This information collection also assumes a total of 950 hours of Federal employee time. The cost of the FNS employee, Program Analyst, involved in project oversight with the study is estimated at GS-13, step 10 at \$56.01 per hour based on 2,080 hours per year. We anticipate the Project Officer will work 800 hours for a total of \$44,808. The cost of the FNS employee, Branch Chief, involved in project oversight with the study is estimated at GS-14, step 2 at \$52.61 per hour based on 2,080 hours per year. We anticipate this person will work 150 hours for a total cost of \$7,891.50. Federal employee rates are based on the General Schedule of the Offices of Personnel Management (OPM) for 2014. The total cost (contract + FNS costs) is \$952,278.50.

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. This program change will add -486 burden hours to the OMB collection inventory.

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 STATA with results presented in tabular form appropriate to the data type with selected Tribe or program characteristics. Data from in-depth interviews and site visits will be recorded and analyzed using NVivo 10 software.

For in-depth interview analysis, the researchers will import detailed notes from each interview into NVivo and will code the data using a standard coding scheme for each interview type. Although the coding schemes for different interview types (e.g., Tribal leader or program administrator) may share many of the same themes, each will be coded separately to match the specific purposes of each interview. Coded interviews will identify characteristics of the Tribe and the interviewee for purposes of analysis.

The schedule for data collection, analysis, and reporting is shown in Table 3 below.

**Table 3
Project Time Schedule**

Activity	Expected Activity Period
Develop and test data collection instruments	October - November 2014
Conduct site visits	March 2015
Conduct surveys	March 2015
Data analysis (site visit data)	April 2015
Data analysis (survey data)	April 2015
Submit final report to USDA	July 2015
Expected Web posting on FNS site	August 2015

A.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 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.