

SUPPORTING STATEMENT - PART A for

OMB Control Number 0584-NEW:

Child and Adult Care Food Program (CACFP) Family Day Care Homes Meal Claims

Feasibility Study

Chanchalat Chanhatsilpa, Ph.D.

Social Science Research Analyst

Special Nutrition Evaluation Branch (SNEB)

Office of Policy Support (OPS)

USDA, Food and Nutrition Service

3101 Park Center Drive

Alexandria, Virginia 22302

Email: chanchalat.chanhatsilpa@fns.usda.gov

Phone: (703)305-2115

Contents

<u>Section A</u>	<u>Page</u>
A1. Circumstances that make the collection of information necessary.	5
A2. Purpose and Use of the Information.	6
A3. Use of information technology and burden reduction.	11
A4. Efforts to identify duplication.	14
A5. Impacts on small businesses or other small entities.	15
A6. Consequences of collecting the information less frequently.	16
A7. Special circumstances relating to the Guidelines of 5 CFR 1320.5.	17
A8. Comments to the Federal Register Notice and efforts for consultation.	18
A9. Explain any decisions to provide any payment or gift to respondents.	21
A10. Assurances of confidentiality provided to respondents.	25
A11. Justification for any questions of a sensitive nature.	28
A12. Estimates of the hour burden of the collection of information.	28
A13. Estimates of other total annual cost burden.	40
A14. Provide estimates of annualized cost to the Federal government.	40
A15. Explanation of program changes or adjustments.	41
A16. Plans for tabulation, and publication and project time schedule.	41
A17. Displaying the OMB Approval Expiration Date.	42
A18. Exceptions to the certification statement identified in Item 19.	42

Exhibits

Exhibit a-1 Estimated Cost for Providers to Participate in the Study.....	23
Exhibit a-2 Estimated Burden of Respondents.....	32
Exhibit a-3 Estimated Annual Cost of Time Burden.....	37
Exhibit a-4 Project Timeline.....	43

Appendices

A-1. Improper Payments Elimination and Recovery Act of 2010(IPERA)	
A-2. Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA)	
A-3. Study Objectives and Research Questions	
A-4. Summary Report of a Pilot Study	

A-5. Public Comment

A-5a Public Comment #1

A-5b Public Comment #2

A-5c Public Comment #3

A-6. Response to Public Comment

A-6a. Response to Comment #1

A-6b. Response to Comment #2

A-6c. Response to Comment #3

A-7. Provider User Guide for Meal Service Reporting System (MSRS)

A-8. Parent User Guide for Child Attendance Reporting System (CARS)

[A-9.](#) Provider User Guide for Meal Service Reporting System (MSRS) in Spanish

[A-10.](#) Parent User Guide for Child Attendance Reporting System (CARS) in Spanish

A-11. Estimated Burden of the CACFP Meal Claim Feasibility Study (Excel)

Section B

B-1. Recruitment Letters

B-1-1. Recruitment Letter to Regional Office

B-1-2. Recruitment Letter to State Agency

B-1-3. Recruitment Letter to CACFP Sponsor

B-1-4. Recruitment Letter to FDCH Provider

B-1-5. Recruitment Letter to Parent

B-1-6. Recruitment Letter to FDCH Provider in Spanish

B-1-7. Recruitment Letter to Parent in Spanish

B-2. Telephone Script for Recruitment and Data Request

B-2-1. Telephone Follow-up Script to Recruit State Agency

B-2-2. Telephone Script to Request Provider Records from the Sponsor

B-2-3. Telephone Script to Request Administrative Data from Sponsor

B-2-4. Telephone Script to Request Meal Claim Data from Sponsor

B-2-5. Telephone Script to Recruit FDCH Provider

B-2-6. Telephone Script to Recruit FDCH Provider in Spanish

B-2-7. Telephone Script to Recruit Parent

B-2-8. Telephone Script to Recruit Parent in Spanish

B-3. Glossy Fact Sheets

B-3-1. Glossy Fact Sheet for CACFP Sponsor and FDCH Provider

B-3-2. Glossy Fact Sheet for Parent

B-3-3. Glossy Fact Sheet for CACFP Sponsor and FDCH Providers in Spanish

B-3-4. Glossy Fact Sheet for Parent in Spanish

B-4. Consent Letters

B-4-1. Consent Letter for Provider

B-4-2. Consent Letter for Parent

B-4-3. Consent Letter for Provider in Spanish

B-4-4. Consent Letter for Parent in Spanish

B-5. NASS Review Comments

A1. 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.

On July 22, 2010, President Obama signed into public law the Improper Payments Elimination and Recovery Act (IPERA) of 2010¹ (Appendix A-1). The act was aimed at reducing wasteful payments by \$50 billion by 2012. Subsequent to IPERA, the U.S. government passed the Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA)² to “intensify efforts to identify, prevent, and recover payment error, waste, fraud, and abuse within Federal spending” (Appendix A-2).

To comply with the IPERA 2010 and IPERIA 2012, the U.S. Department of Agriculture, Food and Nutrition Service (USDA/FNS) needs a reliable methodology to estimate erroneous payments for provider meal claims in the Child and Adult Food Program (CACFP). The program is multifaceted and consists of various administrative venues that serve both children and adults in center-type facilities and private homes alike. FNS conducts an annual study of improper payments that are due to the misclassification of the tiering level of family day care homes (FDCHs) by sponsors³. Prior studies have documented the challenges in validating meal reimbursement and meals served to children at FDCHs. These challenges include, for example, differences in State implementation, local monitoring and reporting requirements, and child attendance patterns. In a 2010 study on erroneous payments in meal claims, FNS found that parents were able to recall the fact that their children attended a day care, but could not give

¹ http://www.whitehouse.gov/sites/default/files/omb/financial/_improper/PL_111-204.pdf

² <https://www.ssa.gov/improperpayments/documents/IPERIA--PLAW-112publ248.pdf>

³ Sponsoring organization or sponsor refers to Public or private non-profit organizations that are entirely responsible for the administration of the CACFP in sponsored facilities such as FDCHs. See http://www.fns.usda.gov/sites/default/files/Monitoring_Homes.pdf.

detailed information on the types of meals their children received while in care. The current project seeks to develop a method (or methods) that accurately estimates meals served at CACFP FDCHs, and to test the viability of this method on a sample of FDCHs for the purpose of estimating the rate of improper payments (Appendix A-3). This method would potentially be used to provide annual national estimates of erroneous payments in compliance with the IPERA for CACFP FDCH meal claims.

A2. Purpose and Use of the Information

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate how the agency has actually used the information received from the current collection.

The study is required to comply with IPERA 2010 and 2012, which, as stated above, stipulates that agencies annually conduct reviews of funded programs to reduce and reverse any instances of improper payments. FNS is seeking to identify an accurate method for estimating errors in FDCHs. In keeping with this aim, the current study explores the feasibility of the proposed data collection method in helping FNS identify and quantify payment errors in these facilities. The information collected from this study may be shared with other departments within the USDA and the government (as determined by FNS). This feasibility study is designed to test a data collection method that accurately estimates erroneous payments due to meals claimed improperly by FDCHs participating in the CACFP, which States administer for the USDA/FNS (Appendix A-3). Specifically, the study focuses on accurately measuring meals that are claimed but not served. As a feasibility study, the collection is voluntary for State agencies and sponsoring organizations; however, USDA/FNS will urge their participation most strongly. The collection is voluntary for providers and parents.

Manhattan Strategy Group (MSG), which is contracted by FNS to carry out the feasibility study, will oversee the data collection activities. The feasibility study begins with recruitment of States, sponsors, and FDCHs to the study. Because there is no national or regional database for CACFP that can provide detailed administrative information on sponsors and FDCHs, we will take a step-by-step approach to gather this information for the purpose of recruiting study participants, completing the sampling, and gathering the administrative data that will support the data collection and analysis. The data collection begins with recruitment of study participants. To start the recruitment, a recruitment letter will be sent to the USDA Food and Nutrition Service Regional Offices (FNSROs) (Appendix B-1-1).

FNSROs will provide their support for the study, along with contact information needed for recruiting the State agencies they oversee, via email communication with FNS and MSG. FNS will then send a recruitment letter to State agencies (Appendix B-1-2) that gives an overview of the study objectives and asks each State for its cooperation in recruiting sponsors for the feasibility study. A State can do this by providing selected administrative data on the sponsors that the State agency oversees, using the forms already in use by the agency. Next, we will contact State agencies using a telephone follow-up script (Appendix B-2-1) to confirm study participation and determine how States will provide the requested information for the sample development. The role of States in the study is limited, given that little information will be requested from them except for a pre-existing list of the sponsors and their contact information. The information will be processed as it is received from States to develop a sampling frame of sponsors for the study.

We will send the selected sponsors a study recruitment letter, as well as additional materials that describe the intent of the study and the sponsors' role in supporting it (Appendices B-1-3, B-3-1, and B-3-3). We will contact sponsors to discuss the study invitation, answer any questions, and arrange to receive administrative data needed to identify the FDCH sample, via a telephone follow-up call (Appendix B-2-2). The information gathered from the sample sponsors, including the number and demographic characteristics of FDCHs (based on pre-existing sponsor records), will be used to develop the FDCH sample for the feasibility study. Upon identifying the FDCH sample, we will notify sponsors and request a limited set of extant administrative data on the sample FDCHs, specifically pre-existing program enrollment forms. The program enrollment forms provide details about FDCH operations and confirm sponsor approval of program participation. We will contact sponsors by telephone, using a telephone script (Appendix B-2-3), to request these administrative data. Additionally, 3 months after the study data collection, the sponsors will be contacted again by telephone to request data on meal claims from the FDCH providers participating in the study (Appendix B-2-4). Asking for this information will not place additional burden on the sponsors in that they already collect it as part of their routine monitoring of meal claims by their providers.

Six weeks prior to the beginning of the feasibility study, MSG will send the selected FDCH providers the Meal Service Reporting System (MSRS) user guide and access instructions (Appendices A-7 and A-9). To invite selected FDCH providers to participate in the study, we will send them an invitation packet that includes materials about the intent of the study and the role of FDCH providers as study participants (Appendices B-1-4, B-3-1, B-3-3, B-4-1, and B-4-

3). We will call or email these FDCH providers to answer any questions they may have about the study, confirm their participation, and seek their support in recruiting parents (Appendix B-2-5). FDCH providers will also be asked to provide a list of parents and children enrolled in their day care homes. This list will be used to select a sample of parents for the feasibility study (Appendices B-1-4 and B-1-6).

As done for the providers, a study information packet will be sent to the selected sample of parents four weeks prior to the study month (Appendices B-1-5, B-1-7, B-3-2, B-3-4, B-4-2, and B-4-4). This packet will also include the Child Attendance Reporting System (CARS) parent user guide (Appendices A-8 and A-10). Within 4 days of sending this packet, the MSG team will conduct follow-up telephone calls with the parents (Appendices B-2-7 and B-2-8) to confirm their receipt of the packet, answer any questions, ask them to review the CARS user guide, and assist them in enrolling in the CARS digital instrument.

During the 1-month study period, parents will use the CARS application to enter the drop-off and pick-up times for their child(ren). They can enter the information into the CARS system either on a mobile phone application or on the CARS website. A toll-free help desk number will be provided to parents for assistance with any problems they may encounter in entering the required information, including doing so in a timely manner and/or as frequently as the study requires. Parents can contact the MSG CARS/MSRS help desk number between 9 a.m. and 5 p.m. Eastern time.

Before the study launch date, we will send FDCHs system-generated text and email reminders of

the 1-month data collection operations, i.e., the study month. FDCH providers will be required to record the times they served each meal type (breakfast, lunch, snack, and supper) to each child enrolled in their day care home. Additionally, parents will be required to enter information about their child(ren)'s absences during the day or when a meal was not served to their child(ren). Up to two reminders will be sent during the course of the day via text or email to prompt FDCH providers to report the meals they have served. FDCHs will be able to enter meal claims only for meals served on the same reporting day. Providers can call the MSG help desk's toll-free number for help in providing information about meals served on the previous day or on missed days. Over the course of the data collection period, we will provide technical assistance to FDCH providers and parents as needed via the toll-free telephone line.

At the end of the study month, or when their participation ends, FDCH providers and parents will be able to delete the MSRS and CARS applications easily from their mobile devices.

Information about meal service and child attendance will be collected from FDCH providers and parents using two digital instruments: the MSRS and the CARS. MSRS is designed for FDCHs to report meal serving times for each child through a smartphone mobile application or a website. CARS collects the child's daily attendance from parents through a text-messaging system or a website. In combination with extant secondary data obtained from CACFP sponsors, MSRS and CARS will collect data to approximate erroneous payments through data triangulation, without intrusion into the routine practices at FDCHs. State agencies, sponsoring organizations, and participating FDCH providers will supply extant data in response to the data requests described in the recruitment letters and the telephone scripts used for the study, detailed in Appendices B-

1-2, B-1-3, B-1-4, B-2-2, B-2-3, and B-2-4.⁴ State agencies will provide a list of sponsoring organizations in the State, their locale, contact information, and the number of providers each sponsor supervises. This information will allow MSG to select and contact 15 sponsors of different sizes and at various locales in two States. Sponsors will provide administrative data for FDCHs, including enrollment information, background, and contact information. We will randomly select 20 providers and assign them to a study group that will use MSRS to record meal services during the study month, or to a control group that will follow business as usual. The background information of providers or the enrollment information will allow us to compare the characteristics of providers and their FDCHs at the time of random assignment. Administrative data from participating FDCH providers include enrollment information and parent contact information, which will allow MSG to verify the enrollment information from sponsors and contact parents to obtain their consent to participate in the study. The data collection instruments and user guides (Appendices A-7, A-8, A-9 and A-10) include all interfaces of the data collection instruments, i.e., MSRS and CARS.

MSG piloted the recruitment and data collection approaches described above in September 2015. Detailed information on this pilot test can be found in Appendix A-4.

A3. 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

⁴ Study participants, both sponsors and FDCHs, use their own formats for capturing and managing the extant data that will be used to inform the sample and data-triangulation procedures for the study's analysis. The contractor, MSG, will simply be processing the data from the formats used by participating sponsors and FDCHs. No additional data collection forms will be used by the study participants.

consideration of using information technology to reduce burden.

The data collection process will use four electronic technologies: (1) CARS website, (2) CARS short message service (SMS), (3) MSRS mobile application, and (4) MSRS website. MSG developed these technologies for the study.

CARS is a reporting solution developed for SMS- and web-based technologies that allows parents/guardians to report their child(ren)'s drop-off and pick-up times. Parents/guardians can send this information simply by sending a text message from their phones to the system, which is designed with specified formats for submitting child-attendance information to the CARS website. CARS uses cell phone numbers from participating parents/guardians (or parent-designated substitutes such as grandparents) whose child(ren) are enrolled in participating FDCHs. No other personally identifying information is required from the parents/guardians. Because some parents/guardians could have more than one child enrolled in the day care center, CARS requires parents/guardians to indicate which child they are reporting attendance on by noting the child's first name in the text message. Parents/guardians do not have to indicate the child's last name in the text. MSG maintains a complete database of children enrolled in the day care home separately on a secure server, and this information cannot be referenced or accessed through CARS.

The MSRS is a web-based or mobile application designed to allow day care providers to submit times when meals are served to each child. Enrollment information of participating FDCHs will be preloaded into the MSRS. When day care providers log in to their accounts, they can see the first names and last-name initials of children enrolled in their FDCH and report attendance and

meal-serving times for these children. Day care providers can access information only for children enrolled at their day cares, secured by a unique username and password. Each child is assigned a unique, proprietary identification that is used to store his or her meal and attendance information. No personally identifiable information is stored or transferred.

Information technology that approximates erroneous payments offers a more efficient approach and an improvement on past methods to estimate erroneous payments because MSRS (1) simplifies the record-keeping task for home day care providers; (2) reduces human errors that can result from the extant paper-and-pencil method, which sometimes requires providers to recall a child's attendance and the number of meals served;⁵ and (3) provides real-time data and reports as part of the verification process. Collecting data via MSRS to approximate erroneous payments reduces intrusion into the daily activities or practices of FDCH providers and parents/guardians, and avoids burdening them needlessly.

We estimate that the entire data collection will amass a total of 23,380 responses from State agencies, sponsors, FDCH providers, and parents/guardians⁶. This number includes both respondents (22,948 responses) and non-respondents (432 responses), see burden table -Exhibit a-2) and Appendix A-11. Of these responses, MSRS collected 88 responses from providers during the pilot test and will collect up to 3,300 responses during the field test, approximately 14.55 percent of the total responses. CARS collected 198 responses from parents during the pilot test and will collect up to 13,200 responses from parents during the field test, which accounts for 57.55 percent of the total responses. We assume that State agencies, sponsors and providers will

⁵ Built-in mechanisms ensure that parents receive daily reminder messages to submit child attendance and that providers receive reminders to record meal-served data for the day.

⁶ This includes participants in a pilot study conducted in 2015 and a field study planned for 2017.

send us requested administrative and meal claim records via email, fax and mail. Based on estimates in the burden table, we anticipate to collect 71.80 percent of the total responses electronically, that is 16,786 of the 23,380 responses.

A4. Efforts to Identify Duplication

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Question 2.

The feasibility study and data collection described here do not duplicate previous studies on improper payments for meal claims at FDCHs. FNS has conducted multiple studies to identify a methodology for estimating meal-claiming errors, although unsuccessfully. The first study, conducted in 2008, explored data recorded by sponsors during their monitoring visits to FDCHs, and compared the number of children observed during those visits with the meals claimed for reimbursement, in an effort to estimate error. This method proved to be unreliable. FNS then undertook a pilot evaluation exploring three alternative data collection methods, including (1) on-site observation, (2) parent-recall interviews, and (3) attendance sign-in and sign-out logs used to record child drop-off and pick-up times. Parent-recall interviews about children's attendance showed the greatest potential to estimate improper payment. In 2010, FNS conducted another study that attempted to use parent recall to validate meal claims. The data were collected through a telephone interview with the parent or primary guardian of a child enrolled in an FDCH. The study's purpose was to ascertain retrospectively whether the child had been present during a specific time period (e.g., a week) and what meals the child was served while in attendance at the FDCH; the study made this determination through an on-site observation at the day care home. The study concluded that relying just on parent recall of a child's attendance was not feasible due to discordance between parent-reported child meals and the actual child meals

observed at the day care. However, the 2010 study showed the greatest promise, with the results showing a higher reliability score than other methods.

Building on lessons from these previous efforts, the current data collection uses digital technology to collect real-time information from both day care providers and parents. Day care providers in the study will report meal-serving information through a smartphone application or a reporting website; participating parents will report their children's attendance information through text messaging on their cell phones or on a reporting website.

A pilot study, as described in Appendix A-4, has demonstrated that providers and parents can use these technologies to report meal service and children's attendance on a daily basis. Thus, in the proposed feasibility study, these data will be collected on a daily basis during the study month. As a reflection of which meals are served and to whom, they are likely to be more accurate than the existing information in the administrative records.

A5. Impacts on Small Businesses or Other Small Entities

If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Six providers participated in the pilot test and we will involve approximately 150 FDCH providers in the field test, which is approximately 14.45 percent of the total 1,038 respondents, all of whom are expected to be home-based small entities. As the name "family day care home" suggests, FDCH providers are run by a parent or a community resident who cares for a small number of children in the home for the convenience of working parents/guardians.

Parents/guardians pay a local market rate for child care. FDCHs must meet any operational or

licensing requirements from the State or local jurisdiction in which they are located.⁷ During the pilot study that preceded this feasibility study, the study team assessed the average time for meal reporting per provider/parent for each day of participation. These data, along with participant exit interviews conducted after completion of the pilot study, demonstrated that the burden on participants was minimal.

The pilot study identified other steps to reduce the burden further, as follows:

1. *Provide detailed guidance on accessing and using MSRS.* Following the user guide, providers will gain immediate access to their accounts and start navigating the application or the reporting website.
2. *Preload the children enrollment information to provider account in MSRS.* When providers log in to their accounts, all children enrolled in the family day care will already be listed so that providers can start reporting meal-serving information right away.
3. *Provide technical assistance to help providers troubleshoot issues or concerns with the system.* Providers can seek technical support via telephone or email. The help desk will provide responses within 24 hours.

A6. 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 data collection efforts proposed in this ICR will affect respondents for 1 month of reporting.

Parents and providers will be required to provide the required information daily (weekdays) by

⁷ Note that the CACFP also operates in family day care *centers*, which may be operated by larger businesses. This study addresses only family day care *homes*.

entering child attendance and meals served information into CARS and MSRS respectively during the data collection month. The current data collection is intended to measure one aspect of improper payment in CACFP using the afore mentioned collection instruments which have been designed for this study. Without this data collection, FNS will not be able to meet the requirements under the Improper Payments Elimination and Recovery Act of 2010 (IPERA) (Appendix A-1) and Improper Payments Elimination and Recovery Improvement Act of 2012 (IPERIA) (Appendix A-2) to identify and reduce erroneous payments in CACFP.

A7. Special Circumstances Relating to the Guidelines 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;**

This study requires respondents to report information to the agency on a daily basis.

Specifically, participating providers and parents are expected to use the MSRS and CARS digital instruments on a daily basis (weekdays) during the study month to report meal-serving times (MSRS) and child attendance (CARS) at FDCHs. The study intends to collect real-time attendance and meal-serving information from parents and providers, respectively. Such real-time reporting has to reflect the daily schedule at FDCHs. The daily reporting during the study month is absolutely critical to the estimation of errors in meal claims, as previous attempts by the agency to collect information about meal claims have not succeeded.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

N/A.

- **Requiring respondents to submit more than an original and two copies of any document;**

N/A.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

N/A.

- **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;**

N/A.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

N/A.

- **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**

N/A.

- **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.**

N/A.

No other special circumstances apply to the study. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A8. Comments to the Federal Register Notice and Efforts for Consultation

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), 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. Specifically address comments received on cost and hour burden.

The 60-day notice to solicit public comments was published in the Federal Register on December

10, 2015 (Vol. 80, No. 238, pages 76927-7693). The public comment period ended on February 9, 2016. FNS received three public comments on the notice, from a sponsor in Kansas, the Michigan Department of Education (MDE), and the School Nutrition Association (SNA). All three comments to the Federal Register notice are included in Appendices A-5a – A5c.

Both the sponsor in Kansas and MDE expressed concern over the potential time burden the data collection could impose on providers and parents (Appendices A-5a and A-5c). In response to these comments (Appendix A-6a and A-6c), FNS recognized the modest burden that the data collection could impose on these respondents. However, the digital data collection methods designed for this study (MSRS and CARS) were developed to minimize such time burden. MSRS and CARS allow providers and parents, respectively, to provide meal-serving and attendance information easily through their mobile phones or computers, with minimal disruption to their daily routines. Feedback from providers and parents during the pilot test of these data collection methods suggests that MSRS and CARS have the potential to facilitate the recordkeeping of meals served at FDCHs; the methods might also reduce the paperwork associated with extant sign-in/sign-out sheets. Furthermore, during the pilot test month, parents used CARS daily, and their response rate was approximately 93 percent. This suggests that CARS poses a negligible time burden and can effectively collect the required data from parents. The summary report of the pilot study, described in Appendix A-4, includes the protocol for the exit interviews.

The Kansas sponsor also expressed concern about the ability of parents to recall child attendance accurately (Appendix A-5c). In response to this concern (Appendix A-6c), the CARS text

messaging system does not require parents to recall child attendance retrospectively, in contrast to the typical standard data collection methods such as survey administration. Rather, the CARS design allows for simple, near real-time reporting of child attendance on a daily basis through a technological device that most adult Americans already carry around with them. This means that parents can text the required information to the system quite easily while they are on the go. To ensure near real-time reporting of child attendance, parents receive text reminders on their cell phones prompting them to report attendance around the usual time they drop off or pick up their children at FDCHs. This near real-time data collection helps to reduce the time lag between the drop-off/pick-up events and the actual reporting, and as a result will reduce or eliminate study-related information recall bias often associated with survey data collection. Thus, the data collection method has promise for more accurate data than asking parents to recall the time they dropped their child off 24 or more hours earlier; and will also discourage non-response due to negligence or outright forgetfulness on the part of parents. This feasibility study does not include parents who do not have a cell phone.

The third commenter, the School Nutrition Association, expressed support for the study (Appendix A-5b), the data collection methods, and the value of this feasibility study. FNS responses to all three comments are included in Appendices A-6a-A-6c.

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 format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior years. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be

explained.

On behalf of FNS, the contractor consulted the National CACFP Sponsors Association to obtain insights into potential barriers to the study, especially the implementation of the technology. The contractor held two information sessions with Mr. Blake Stanford, former President of the Texas CACFP Sponsors' Association, to obtain information about the current practices in meal claims at FDCHs. The contractor learned that a considerable number of FDCH providers have submitted meal claims electronically and was advised that the data collection instruments could be better received if the data reporting process was aligned with providers' daily routine. The contractor followed this advice throughout its development process and designed MSRS to mimic the work flow at FDCHs. The contractor contacted Mr. Stanford via email (blake@swhuman.org) and provided conference line for the information sessions. His phone number is 512.467.7916.

The Contractor, on behalf of FNS, also conducted a month-long pilot study in September 2015 with four providers and nine parents in Texas to test the burden on participants. The contractor conducted exit interviews in early October 2015 with all participants to understand their experience during the pilot study, asking specifically about the time they spent on using MSRS and CARS. The burden estimates for this study are developed based on feedback from participants in this pilot test. A summary report of the pilot study can be found in Appendix A-4.

A9. Explain any Decisions to Provide Any Payment or Gift to Respondents

To encourage parents and FDCHs to use the data collection platforms (during the study month), participating parents will receive a \$25 Visa gift card and providers a \$60 Visa gift card at the end of the study month. The incentive for parents is based on estimated cell phone charges

incurred from data transmission during the study month. Parents will send at least two text messages per day for each child enrolled at the participating FDCHs. Text messaging charges vary depending on the phone plan in which parents enroll with the wireless phone carriers. If we assume \$0.25 per message and a maximum of four messages per day for a parent, the monthly cost of text messaging is approximately \$22 for 22 business days. Parents may send more messages per day if they need to report different attendance for multiple children, if they make additional child pick-ups and drop-offs during the day (such as picking up a child for a doctor’s appointment and then dropping back off at the FDCH), or if they make multiple attempts to send messages. Parents will also receive text reminders to report pick-up and drop-off times, if they have not done so as expected. The \$25 Visa gift card also accounts for cell phone charges that may be incurred from any calls parents may make to ask questions and report problems with using the system, or to report attendance information for the child. Because parent participation is voluntary, the incentive is crucial to ensure sufficient parent participation and minimize the effects of non-response bias.

The \$60 Visa gift card to providers is based on potential costs that providers may incur from compiling and submitting the requested administrative data. The amount also accounts for any costs associated with transmitting administrative data during the study month. Exhibit a-1 provides the basis of the costs that providers may incur to participate in the study.

Exhibit a-1. Estimated Cost for Providers to Participate in the Study

Participating Provider Activities	Cost Estimate
-----------------------------------	---------------

Purchase basic cell phone monthly plan with data ¹	\$45.00
Travel to a copy center (10 miles each way at \$0.54 per mile or shorter distance for ride-hailing service) ²	\$10.80
Copy 3 pages of the enrollment form and fax (long distance) ³	\$5.00

Monthly Total \$60.80

¹ The cost estimate includes fees and taxes which may range from \$35 to \$55 or more per month. For example, the cheapest data plan costs \$30 per month plus fees and tax at AT&T with 1 GB of data, \$35 at Verizon Wireless or Cricket Wireless with 2 GB of data, and \$40 at T Mobile with 3 GB of data.

² Beginning on Jan. 1, 2016, the standard mileage rates for the use of a car (also vans, pickups or panel trucks) will be 54 cents per mile for business miles driven, according to an announcement at the Internal Revenue Service, retrieved from <https://www.irs.gov/uac/newsroom/2016-standard-mileage-rates-for-business-medical-and-moving-announced-on-September-1>, 2016.

³ A typical cost at Kinko’s for a long-distance fax is \$2 for the first page \$1.50 for each subsequent page. For a 3-page fax, it will cost approximately \$5 plus tax.

Providers, like parents who are eligible for CACFP, tend to be low-income individuals operating a small home-based business. They do not have the access to business support equipment, such as an adequate data plan, a printer or fax (which requires a landline), and may need to travel to an officer center to comply with the study. In addition, to participate in the study, providers may require more connectivity to transmit data than they currently have. In the example in Exhibit a-1, we assumed the provider will access MSRS via his or her smartphone, which requires a data plan. During the study month, providers will use their smartphone carrier’s network or the Internet to report meals served. The incentive will cover the data costs for one month for a provider without a current smartphone data plan. The cost of a data plan varies by service provider; the cost cited above is typical for a basic plan. Prepaid plans are available without a contract. Providers with a current data plan may exceed their usual monthly data charges and incur a fee of \$10 or more. As an alternative, providers may access MSRS via computer which requires Internet access at their homes. The monthly cost for the Internet tends to be higher than for a smartphone data plan and may require a contract and installation.

Providers may need to travel to a copy center to make copies of documents and/or fax enrollment forms to the contractor before the study month. Many providers in rural areas may travel longer distances to reach a facility where they can copy and fax the enrollment forms; providers in urban or suburban areas may not own a vehicle and may need to rely on public transit, a taxi, or a ride-hailing service. The estimates in the example are fair estimates of potential costs to participants for their participation in the study for one month.

The primary study objective is to establish MSRS and CARS as valid and reliable methods to assess errors in CACFP meal claims in FDCHs. For this reason, it is crucial to have a sufficient number of providers to participate in the study and comply with the daily reporting requirements during the study month. The incentive addresses the logistic concerns that may prevent providers from participating or jeopardize a response rate of 80 percent or higher.

The incentives proposed for parents and providers are based on the contractor's experience working with this population. The study offers payments to all participants regardless of whether they provide complete data in the study period. Differential incentives would pose ethical issues and will not be used.

Incentives are offered to FDCH providers because provider participation directly affects the quality of this study. Previous FNS research has used monetary incentives to encourage FDCH providers to participate in similar studies.⁸ Using incentives to encourage providers to participate

⁸ Cohen, R., Hulsey, L., Feldman, S., Gentile, C., & Hall, J. (2009). Child and Adult Care Food Program (CACFP): Improper payments data collection pilot project. Alexandria, VA: U.S. Department of Agriculture, Food and Nutrition Service.

will result in more data and more reliable conclusions from the study results.

Additionally, providers serve as points of contact to help the study team recruit parents. As shown in the pilot study conducted in September 2015, parents respect and trust their child care providers' decision to participate in the study so they are more likely to agree to participate if their child care provider participates. Consequently, providers' strong rapport with parents uniquely positions them to introduce and engage parents in the study. Without providers' support in reaching the parents, it will be extremely challenging to recruit parents or get them to participate in the study.

Incentives are offered to parents because, as with FDCH providers, their participation involves a new reporting tool (CARS). Previous FNS research demonstrates that participation in certain food program studies by target populations increases under conditions of applied incentives.⁹ Without parents reporting child attendance in CARS, the study will not collect sufficient information to test the feasibility of the data collection methods proposed.

We will give the incentives in the form of Visa gift cards delivered to study participants at the end of the data collection month.

A10. Assurances 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.

FNS complies with the Privacy Act of 1974. The CARS and MSRS applications do not collect,

⁹ Ibid.

store, or process any personally identifiable information. The CARS application uses first name to link children to parents; MSRS uses first name and last initial to report meal-serving time to avoid confusion should providers have two children with the same first name. All day care providers, parents, and children are assigned proprietary unique identification numbers that are used to match data to our offline records. We will generate scrambled identification numbers once child-level information is collected from the sponsoring organization. The child will not be identifiable except by providers once the contractor preloads child information into their account. Providers will see only each child's first name and last name initial(s) to report meal-serving time. Offline data are stored in a secure file storage system and will be destroyed following the conclusion of the study.

Data collected using MSRS and CARS will be accessible to the study team members only. These data will be analyzed in aggregate form without identifying individual participants. Our secure storage uses a 256-bit AES encryption protocol for all methods of transmitting files and while at rest, such that no meaningful data can be hacked or intercepted. Any files made public will be stripped of personally identifiable information before publishing or transmitting.

Storage Controls

- MSG stores data files at rest on the corporate private cloud-based system, Egnyte.
- Egnyte uses 256-bit AES encryption protocol for all methods of transmitting files and while at rest. No meaningful data can be hacked or intercepted. Egnyte's desktop applications used to sync information also utilize the same encryption methods for transferring data using SSL.

- Egnyte employees do not have access to the contractor's files.
- More information about Egnyte's security policy can be found at <https://www.egnyte.com/file-server/security-privacy.html>.

Authentication & Authorization Controls

- MSG can grant permissions in Egnyte to individuals or groups of individuals.
- All user accounts require a unique username and password to access the file system.
- Granular permissions are granted on folders containing sensitive data to specific individuals on an as-needed basis.
- We follow a least privileged access model where users have access only to the folders and files deemed necessary to fulfil their task.
- Access is approved by the project's project director.
- Groups and users are separated based on their need to access sensitive data or de-identified/anonymized information.

Retention Policies

- Purging of any data containing PII will occur either once yearly and also at the end of the contract, or as directed by the client.
- Each data file/collection will have a defined retention policy.

MSG will ensure the privacy and security of electronic data during the data collection and processing period following the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports (56 FR 19078, April 25, 1991).

A11. Justification for any Questions of a Sensitive Nature

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.

No questions of a sensitive nature are part of the data collections associated with this ICR.

A12. Estimates of the Hour Burden of the Collection of Information

Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

A. 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.

Estimated Number of Respondents

Respondents in the 2015 pilot test include two State agencies, three sponsors, six providers (two for the cognitive interview before the pilot month and four for the pilot month), and nine parents. For the field test in 2017, we will contact three State agencies, 20 sponsors, 180 family day care providers, and 750 parents. Upon FNS's approval, the contractor will select two States and a purposive sample of 15 sponsors for the field test to represent sponsors of varying sizes in urban, suburban, and rural areas.

Twenty (20) providers will be randomly selected from each selected sponsor. The providers will then be evenly assigned to a study or a control group, i.e., 10 providers to the study (treatment) group and the other 10 to the control group. Therefore, there will be a total of 300 providers in the study, i.e., 20 providers per sponsor x 15 sponsors. Since the providers assigned to the control group will not be contacted for this study, the respondents will include only the 150 providers in the study group. The data relating to the control group will allow us to compare

findings across the two groups only in relation to estimates of meal claims errors.

Parents are not required to support the study but will be asked to participate in the study voluntarily if their children attend participating providers' day care homes. Assuming an average of five families per provider, the study group will include an initial sample of 750 parents, i.e., 5 families x 10 providers in the study group x 15 sponsors. Assuming an 80 percent response rate, the final analytic sample will include approximately 600 parents, i.e., 750 parents x 80 percent.

Estimated Frequency of Responses per Respondent

The contractor estimates that the frequency of responses per respondent will average 23 responses per respondent across the entire collection, i.e., 23,380 responses from respondents divided by 1,038 respondents.

Each State agency will provide three types of responses for the study, i.e., (1) review recruitment letter (Appendix B-1-2), (2) provide requested information about sponsors, and (3) communicate with the contractor regarding participation and the data request and transfer (Appendix B-2-1).

These activities are included in the burden estimate in Appendix A-11.

Each sponsor will provide five types of responses: (1) review materials in the study package (Appendices B-1-3 and B-3-1), (2) provide administrative records for CACFP day care providers, (3) provide monthly meal claim data three times, (4) attend follow-up communication with the contractor (Appendices B-2-2, B-2-3 and B-2-4), and (5) facilitate study recruitment of

providers as necessary.

Each day care home provider selected for the study will offer five types of responses: (1) review materials in the study package (Appendices B-1-4, B-1-5, B-3-1, B-3-3, B-4-1 and B-4-3; (2) provide enrollment data, (3) report meal-service information via the smartphone app or the reporting website (22 times), (4) contact the contractor or take follow-up calls about the study and the requested data with the contractor (B-2-5), and (5) facilitate parent recruitment as needed (Appendices B-1-4, B-2-5, and B-3-1).

Participating parents will provide three types of responses: (1) review materials in the study package (Appendices B-1-5, B-1-7, B-3-2, B-3-4, B-4-2, and B-4-4), (2) report child attendance via text messages on their personal mobile phone or a reporting website (22 times), and (3) contact the contractor or take follow-up calls from the contractor (Appendix B-2-6).

Estimated Total Annual Responses

23,380 (see Exhibit a-2 below)

Estimated Time per Response

The estimated time of response varies from 5 minutes (for a parent to use CARS in a day) to 2 hours (for a State agency to provider sponsor data) depending on the respondent group, as shown in Exhibit a-2 below, with an average estimated time of 0.14 hours for respondents and 0.18 hours for non-respondents.

Estimated Total Annual Burden on Respondents

The total public reporting burden for this collection of information is estimated at 3,284.59 hours. The estimated burden for each type of participant is detailed in Exhibit a-2 below. This table is included in the first tab in Appendix A-11. In Appendix A-11, we also estimated the burden on respondents in the pilot test.

Exhibit a-2. Estimated Burden of Respondents

Affected public		RESPONDENTS									NON-RESPONDENTS			
Respondents Type	Instrument	Appendix #	Data Collection Mode	Sample Size	Estimated Number of Respondents	Frequency of Response	Total Responses	Average Time Per Response (Hours)	Total Estimated Annual Burden (Hours)	Estimated Number of Non-Respondents	Frequency of Response	Total Responses	Average Time Per Response (Hours)	Total Estimated Annual Burden (Hours)
State, local, and Tribal government														
State Agency	Review Recruitment Letter	Appendix B-1-2	Mail	3	2	1	2	0.25	0.50	1	1	1	0.25	0.25
	Participate in Follow-Up Calls	Appendix B-2-1	Phone call (d)	3		2	4	0.75	3.00		2	2	0.75	1.50
	Provide Sponsor Data		Email, Fax or Mail	3		1	2	2.00	4.00		0	0	2.00	0.00
	Answer Follow-Up Calls		Phone call (d)	3		1	2	0.25	0.50		0	0	0.25	0.00
Subtotal of State, Local, and Tribal Government					2	5	10	0.80	8.00	1	3	3	0.58	1.75
Business for-not-for profit														
For-Profit/Non-Sponsor	Review Materials in the Study Package - Recruitment Letter	Appendix B-1-3	Mail	20	15	1	15	0.25	3.75	5	1	5	0.25	1.25
	Review Materials in the Study Package - Glossy Fact Sheet	Appendix B-3-1	Mail	20		1	15	0.25	3.75		1	5	0.25	1.25

P r o f i t B u s i n e s s		Participate in Follow-Up Calls About Data Request	Appendix B-2-2	Phone call (d)	20		2	30	0.25	7.50		0	0	0.25	0.00
		Provide Provider Data		Email, fax or mail	20		1	15	0.50	7.50		0	0	0.50	0.00
		Respond to Follow-Up Calls About Provider Data	Appendix B-2-3	Phone call (d)	20		1	15	0.50	7.50		0	0	0.50	0.00
		Provide Meal Claim Data		Email, fax or mail	20		3	45	0.75	33.75		0	0	0.75	0.00
		Respond to Follow-Up Calls About Meal Claim Data	Appendix B-2-4	Phone call (d)	20		2	30	0.25	7.50		0	0	0.25	0.00
		Facilitate the Recruitment of Providers		Face-to-face between providers and sponsors	20		1	15	1.00	15.00		0	0	1.00	0.00
F o r - P r o f i t / N o n - P r o f i t B u s i n e s s (a)	P r o v i d e r	Review Materials in the Study Package - Recruitment Letter	Appendix B-1-4 or B-1-6	Mail	180	150	1	150	0.20	30.00	30	1	30	0.20	6.00
		Review Materials in the Study Package - Glossy Fact Sheet	Appendix B-3-1 or B-3-3	Mail	180		1	150	0.25	37.50		1	30	0.25	7.50
		Review Materials in the Study Package - Consent Form	Appendix B-4-1 or B-4-3	Mail	180		1	150	0.083	12.50		1	30	0.083	2.50
		Participate in Follow-Up Calls About Data Request	Appendix B-2-5	Phone call (d)	180		1	150	0.25	37.50		0	0	0.25	0.00
		Provide Enrollment Data		Email, fax or mail	180		1	150	0.50	75.00		0	0	0.50	0.00

		Answer Follow-Up Calls		Phone call (d)	180		2	300	0.25	75.00		0	0	0.25	0.00
		Review User Guide	Appendix A-7 or A-9	Instructional materials	180		1	150	0.25	37.50		0	0	0.25	0.00
		Report Meal Service During the Study Month		Digital data collection	180		22	3,300	0.25	825.00		0	0	0.25	0.00
		Contact Help Desk and Answer Following-Up Calls		Phone call (d)	180		2	300	0.25	75.00		0	0	0.25	0.00
		Facilitate Recruitment of Parents		Face-to-face between providers and parents	180		1	150	0.50	75.00		0	0	0.50	0.00
Subtotal of For-Profit/Non-Profit Business Sector					165	31	5,130	0.27	1,366	35	2.86	100	0.19	18.50	
Individual/Households															
Individual/Households	Parent	Review Study Materials - Recruitment Letter	Appendix B-1-5 or B-1-7	Mail	750	600	1	600	0.10	60.00	150	1	150	0.10	15.00
		Review Study Materials - Glossy Fact Sheet	Appendix B-3-2 or B-3-4	Mail	750		1	600	0.10	60.00		0	0	0.10	0.00
		Review Study Materials - Consent Letter (b)	Appendix B-4-2 or B-4-4	Mail	750		1	600	0.10	60.00		0	0	0.10	0.00
		Answer Follow-Up Calls	Appendix B-2-6	Phone call (d)	750		1	600	0.10	60.00		0	0	0.10	0.00
		Review User Guide	Appendix A-8 or A-10	Instructional materials	600		1	600	0.25	150.00	0	0	0	0.25	0.00

	Report Child Attendance Time During Study Month, e.g., respond to text reminders		Digital data collection	600		22	13,200	0.08	1,056.00		0	0	0.08	0.00
	Contact Help Desk and Answer Follow-Up Calls (c)		Phone call (d)	600		2	1,200	0.25	300.00		0	0	0.25	0.00
Subtotal of Individual/Households				600	29	17,400	0.10	1,746.00	150	1	150	0.10	15.00	
Pilot Test				20	20	408	0.21	87.54	65	2.75	179	0.23	41.55	
Grand Total				787	29	22,948	0.14	3,207.79	251	0.58	432	0.18	76.80	

Total # of respondents (including participants and non-respondents) 1,038
Total # of annual responses (including participants and non-respondents) 23,380
of annual responses per respondent 23
Total annual burden estimates (including participants and non-respondents) 3,284.59
Total # of electronic responses 16,786
Percentage of total responses collected electronically 71.80%

Notes:

- (a) State agencies, sponsors and day care home providers receive federal funding and, therefore, are strongly encouraged to support this study per Section 305 of the Healthy Hunger Free Kids Act of 2010.
- (b) Based on our experience with similar populations and the results from the pilot test, we assume 80 percent of parents will agree to participate in the study.
- (c) We assume participants remain eligible and enrolled at the same providers' day care homes at the time of the study.
- (d) Phone calls in this study are not for the purpose of CATI data collection.

B. Provide Estimates of Annualized Cost to Respondents for the Hour Burdens for Collections of Information, Identifying and Using Appropriate Wage Rate Categories

Appendix A-11 provides a complete breakdown of the estimated burden per participant group for the study. The total annualized cost for this ICR is \$44,537.07. Exhibit a-3 shows the estimation of respondent cost. For the state agencies, sponsors, and providers, the estimate of the respondent cost is based on the burden estimates and uses the wage rates from the U.S. Department of Labor, Bureau of Labor Statistics, May 2015 National Wage Statistics. The Occupational Groups and the hourly mean wages are shown below:

State Agencies

The estimate of respondent cost uses the Occupational Group (11-0000) (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage (for Management Occupations) for functions performed by education administrators of preschool and childcare programs is estimated at \$25.37.

Sponsors

The estimate of respondent cost uses the Occupational Group (11-0000) (http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage (for Management Occupations) for functions performed by social and community service managers is estimated at \$33.38.

Providers

The estimate of respondent cost uses the Occupational Group (39-0000)

(http://www.bls.gov/oes/current/oes_nat.htm). The hourly mean wage (for Personal Care and Service Occupations) for functions performed by childcare workers is estimated at \$10.72.

Parents

The estimate of respondent cost is based on the burden estimates and uses the U.S. Census (<https://www.census.gov/hhes/www/income/data/historical/people>). In 2014¹⁰, per capita income in the United States was \$30,176, which equals an hourly wage rate of \$14.50 (\$30,176 / 52 weeks x 40 hours/week). The field test will include parents who are both eligible and ineligible to participate in the CACFP food program, and therefore we use the per capita income.

Exhibit a-3. Estimated Annual Cost of Time Burden

Affected public	Respondents Type	Instrument	Appendix #	Data Collection Mode	Sample Size	Grand Total Burden Estimate (Hours)	Hourly Wage rate	Estimate Total Annual Cost to Respondents
State, local, and Tribal government								
State/Local Government (a)	Regional Office	Review Recruitment Letter	Appendix B-1-1	Mail	4	1.00	\$25.37	\$25.37
	State Agency	Review Recruitment Letter	Appendix B-1-2	Mail	3	0.75	\$25.37	\$19.03
		Participate in Follow-Up Calls	Appendix B-2-1	Phone call (d)	3	4.50	\$25.37	\$114.17

¹⁰ As of August 31, 2016, 2014 is the most recent year for which per capita income was available from the Census Bureau. For reference purposes, in 2015 the Social Security Administration used a 0.0 percent cost-of-living adjustment over 2014 (<https://www.ssa.gov/oact/cola/autoAdj.html>).

	Provide Sponsor Data		Email, Fax or Mail	3	4.00	\$25.37	\$101.48
	Answer Follow-Up Calls		Phone call (d)	3	0.50	\$25.37	\$12.69
Subtotal of State, Local, and Tribal Government					10.75		\$247.36

Business for-not-for profit								
For-Profit/Non-Profit Business (a)	Sponsor	Review Materials in the Study Package - Recruitment Letter	Appendix B-1-3	Mail	20	5.00	\$33.38	\$166.90
		Review Materials in the Study Package - Glossy Fact Sheet	Appendix B-3-1	Mail	20	5.00	\$33.38	\$166.90
		Participate in Follow-Up Calls About Data Request	Appendix B-2-2	Phone call (d)	20	7.50	\$33.38	\$250.35
		Provide Provider Data		Email, fax or mail	20	7.50	\$33.38	\$250.35
		Respond to Follow-Up Calls About Provider Data	Appendix B-2-3	Phone call (d)	20	7.50	\$33.38	\$250.35
		Provide Meal Claim Data		Email, fax or mail	20	33.75	\$33.38	\$1,126.58
		Respond to Follow-Up Calls About Meal Claim Data	Appendix B-2-4	Phone call (d)	20	7.50	\$33.38	\$250.35
		Facilitate the Recruitment of Providers		Face-to-face between providers and sponsors	20	15.00	\$33.38	\$500.70
For-Profit/Non-Profit Business (a)	Provider	Review Materials in the Study Package - Recruitment Letter	Appendix B-1-4 or B-1-6	Mail	180	36.00	\$10.72	\$385.92
		Review Materials in the Study Package - Glossy Fact Sheet	Appendix B-3-1 or B-3-3	Mail	180	45.00	\$10.72	\$482.40
		Review Materials in the Study Package - Consent Form	Appendix B-4-1 or B-4-3	Mail	180	15.00	\$10.72	\$160.80
		Participate in Follow-Up Calls About Data Request	Appendix B-2-5	Phone call (d)	180	37.50	\$10.72	\$402.00
		Provide Enrollment Data		Email, fax or mail	180	75.00	\$10.72	\$804.00
		Answer Follow-Up Calls		Phone call (d)	180	75.00	\$10.72	\$804.00
		Review User Guide	Appendix A-7 or A-9	Instructional materials	180	37.50	\$10.72	\$402.00
		Report Meal Service During the Study Month		Digital data collection	180	825.00	\$10.72	\$8,844.00

		Contact Help Desk and Answer Following-Up Calls		Phone call (d)	180	75.00	\$10.72	\$804.00
		Facilitate Recruitment of Parents		Face-to-face between providers and parents	180	75.00	\$10.72	\$804.00
Subtotal of For-Profit/Non-Profit Business Sector						1,384.75		\$16,855.60
Individual/Households								
Individual/Households	Parent	Review Study Materials - Recruitment Letter	Appendix B-1-5 or B-1-7	Mail	750	75.00	\$14.50	\$1,087.50
		Review Study Materials - Glossy Fact Sheet	Appendix B-3-2 or B-3-4	Mail	750	60.00	\$14.50	\$870.00
		Review Study Materials - Consent Letter (b)	Appendix B-4-2 or B-4-4	Mail	750	60.00	\$14.50	\$870.00
		Answer Follow-Up Calls	Appendix B-2-6	Phone call (d)	750	60.00	\$14.50	\$870.00
		Review User Guide	Appendix A-8 or A-10	Instructional materials	600	150.00	\$14.50	\$2,175.00
		Report Child Attendance Time During Study Month, e.g., respond to text reminders		Digital data collection	600	1,056.00	\$14.50	\$15,312.00
		Contact Help Desk and Answer Follow-Up Calls (c)		Phone call (d)	600	300.00	\$14.50	\$4,350.00
Subtotal of Individual/Households						1,761.00		\$25,534.50
Pilot Test						112.84		\$1,899.62
Grand Total						3,269.34		\$44,537.07

A13. Estimates of Other Total Annual Cost Burden

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 questions 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.

There are no capital or start-up or ongoing maintenance or operation costs associated with this information collection.

A14. Provide Estimates of Annualized Cost to the Federal Government

Provide estimates of annualized cost to the Federal government. 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 estimated cost of the study to the federal government incurred through the contract to Manhattan Strategy Group is \$1,084,908.51 over a period of 3 years (September 2014 through October 2017), representing an annualized cost of \$361,636.17. This represents the contractor's costs for labor, other direct costs, and indirect costs. The cost of the FNS employee, the Social Science Research Analyst/Project Officer involved in project oversight with the study, is estimated at GS-12, step 10, at \$48.27/per hour according to the 2016 general schedule salary table for the Washington, D.C. area.¹¹ The estimated time that will be spent on the project by the FNS Social Science Research Analyst is 10 hours per week for an estimated 3-year total of \$75,301.20 and annual total of \$25,100.40. Adding the federal GS-12 labor estimate to the study's annualized cost yields a total estimated annualized cost to the federal government for this project of \$386,736.57.

¹¹ https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2016/DCB_h.pdf

A15. Explanation of Program Changes or Adjustments

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

This submission is a new information collection request as a result of program changes and will add 3,284.59 burden hours and 23,380 annual responses to OMB's inventory.

A16. 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.

Following completion of the feasibility study, MSG will prepare a report that describes the study's implementation process and findings. The report will also include discussions of program outcomes, lessons learned, next steps, and recommendations for further action. Specifically, the report will provide FNS with data either to support or reject the data collection methods proposed in this feasibility, as appropriate for estimating meal claim errors in FDCHs across the country, and weighing the justifications for making such recommendations.

The report will include an executive summary and an introduction that presents the study objectives and research questions (Appendix A-3). It will then describe the study methodology, the data collected, the strengths and limitations of data availability and quality, and the level of effort required to collect data from participants. A section on data synthesis and analysis will shed light on how viable it may be to replicate the study approach as a means of measuring erroneous payments nationwide. The report will conclude with a discussion about alternatives or

modifications to the approach that may be explored in future studies, studies that might likewise endeavor to identify an accurate method for estimating meal claim errors in these homes.

The feasibility report will include all references as well as appendices to data sources, development plans, files, variables, and the treatment of missing or inaccurate data. Other supporting documentation will be provided as necessary to describe the study and methodologies in detail. A final briefing will be provided to FNS at its offices in Alexandria, Virginia. The study team will present the study objectives, research questions, methodology, key findings, and its recommendations for conducting a national study based on the feasibility study conclusions. Exhibit a-4 shows the project activities and the timeline to publish the results of information collected in this ICR.

A17. Displaying the OMB Approval Expiration Date

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 for OMB approval of the information collection on all instruments.

A18. Exceptions to the Certification Statement Identified in Item 19.

Explain each exception to the certification statement identified in Item 19 of the OMB 83-I "Certification for Paperwork Reduction Act."

There are no exceptions to the certification statement.

Exhibit a-4. Project Timeline

Task	Title	Start Date (# of Days After Obtaining OMB Clearance)	Finish Date (# of Days After Obtaining OMB Clearance)	Task Duration (# of Days)
4. Recruit States, Sponsors, and Homes	Draft and final summary report on recruitment	21	270	249
	Teleconferences or webinars with sampled parties	140	197	57
	Memorandum of understanding with sampled parties ¹²	21	74	53
6. Select and Train Data Collectors	Memorandum on training ¹³	7	235	228
7. Schedule and Conduct Data Collection	Bi-weekly data collection status reports and conference calls ¹⁴	78	228	150
	Pre-study month 1 data collection	78	107	29
	Pre-study month 2 data collection	139	169	30
	Study month data collection	198	228	30
8. Create Study Database and Analyze Data	Memorandum of intent for modifications to the data analysis plan of the data analysis ¹⁵	36	438	402
	Data files and codebooks	78	438	360
9. Feasibility Report	Draft tables and graphics	294	403	109
	Outline of feasibility report	322	354	32
	Feasibility report	357	557	200
10. Final Briefing	Final briefing with materials	560	585	25

Memorandum of understanding with sampled parties

¹² This will include only States, as referenced in the study plan.
Memorandum on training

¹³ The memorandum will summarize the training to data collectors, indicating data collector's readiness to collect data and detailing issues encountered during the training and how they were resolved.
Bi-weekly data collection status reports and conference calls

¹⁴ The schedule reflects data collection over an 8-month period to account for a 3-month lag time between meals being claimed via paper and MSG receiving the copies of the claims from the sponsors.
Memorandum of intent for modifications to the data analysis plan of the data analysis

¹⁵ The memorandum will document any changes to the analytic framework on an ongoing basis.