

SUPPORTING STATEMENT PART A FOR
Assessing the Child Nutrition State Administrative Expense
Allocation Formula

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Part A Justification

A.1 Circumstances making the collection of information necessary

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

This is a new information collection request. The Food and Nutrition Service (FNS), Department of Agriculture (USDA), is conducting a study, *Assessing the Child Nutrition State Administrative Expense Allocation Formula*, to assess the effectiveness of the current formula used for State Administrative Expense (SAE) allocations. The focus of this study is the SAE allocations in five of the Child Nutrition Programs: the National School Lunch Program (NSLP), School Breakfast Program (SBP), Child and Adult Care Food Program (CACFP), Special Milk Program (SMP) and the Food Distribution Program for schools (FDP).¹ The data collection is authorized under section 28(c) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1769i), the authorizing statute for NSLP, CACFP and FDP (Appendix A-1). Specifically, section 28(c) requires entities participating in the programs authorized under the Richard B. Russell National School Lunch Act and the Child Nutrition Act

¹ State administrative funds (SAF) for the Summer Food Service Program are provided separately from SAE, in accordance with 42 USC 1761(k); use of these funds is not covered by this study.

of 1966 (42 U.S.C. 1771) to cooperate in the conduct of evaluations and studies.

These programs are operated by a wide variety of local public and private providers that enter into agreements with State agencies, which are responsible for oversight and administration, including monitoring program operations and distributing Federal cash reimbursements and USDA Foods. As local administrators of Child Nutrition Programs, States receive SAE funds from the Federal government to help cover their administrative costs. The funds are appropriated annually to USDA FNS under the authority of Section 7 of the Child Nutrition Act of 1966 (Appendix A-2), which sets forth the total amount of funds available for SAE and a formula for allocating the majority of the funds to States—commonly referred to as the “nondiscretionary” allocation. Program regulations at 7 CFR 235.4 (Appendix A-3) include the statutory allocation formula as well as the formula USDA adopted for allocation of the funds not distributed through the nondiscretionary allocation. The Child Nutrition Act also sets funds availability at two years, authorizes a reallocation process for unused funds, and requires a State plan for use of the funds, approved by FNS. SAE funds can be spent on reasonable, allocable, and necessary expenses incurred by the State including, but not limited to, salary and benefits, staff training, office equipment, support services, travel, monitoring and technical assistance activities. Funds that are not used by a State are returned for reallocation to

other States; no more than 20 percent of the initial allocation may be carried over by a State to the next fiscal year. Finally, the Child Nutrition Act also imposes a “State Funding Requirement,” under which States must contribute no less than their level of contribution in Fiscal Year (FY) 1977 to the SAE budget.

There has not been any comprehensive research conducted on the SAE formula and State use of SAE funds for more than 30 years. The 1985 FNS study, *An Examination of State Administrative Expense Funding in the Child Nutrition Programs*, included review of national data and case studies in ten states. However, significant changes have occurred in the intervening years, both to SAE requirements and to the Child Nutrition Programs in general, which necessitate the collection of information in this study. FNS has contracted with Westat to carry out this scope of work.

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 primary purpose of this voluntary, one-time data collection is to assess the effectiveness of the current formula used for SAE allocations, identify and examine factors that influence State spending, and develop and test a range of possible alternatives to improve the SAE allocation formula. The study will

examine historical patterns in SAE allocation, reallocation, and recoveries; determine factors affecting State use of SAE allocation; identify best practices that help States use funds more effectively; and develop and evaluate budget neutral alternatives to the current formula. There is currently no other effort that can address the research objectives of the proposed study. FNS may use the information from the study to inform future policy and/or regulations to improve the SAE allocation process. The final study report will be shared publicly on the FNS website upon completion.

The study will collect data via pre-visit telephone interviews, and on-site in-depth interviews of State Directors and identified key staff from 12 States. In the 12 selected States, we will interview State Directors/key staff in all of the State agencies that receive Child Nutrition SAE funds.² We will take a systematic approach to State selection so that the group of 12 States reasonably reflects the diversity and variation of programs nationwide. We will use existing information about the distribution of the following characteristics to select a sample of States that achieves a balanced representation across these factors:

- **Program size.** We will use current data on the initial SAE allocation amounts to identify each State as large (top third of States), medium (middle third of States), or small (bottom third of States), with an

² The number of State agencies that receive SAE funds ranges from 1 to 3 agencies per State, depending on which agencies in the State administer each of the Child Nutrition Programs (School Meals, CACFP, FDP).

ultimate goal of roughly equal representation across the three categories.

- **Historical SAE Funds Usage.** Using SAE data for the prior 10 years, we will identify States based on frequency of receipt of reallocated funds; return or recovery of funds vs. full use of funds; and funds transfers within agencies in a State.
- **State contribution levels.** We will calculate each State's contribution as a percentage of their statutorily required amount, to identify States that contribute significantly more than required.
- **State administrative structure.** We will identify States with more than one agency operating the programs covered by SAE within the State. When there are multiple State agencies within a State, we will also look at whether the FDP is operated in a different agency than the School Meal Programs. This will allow us to explore processes, efficiencies and impacts in various scenarios related to FDP, given the potential challenges some States face with funding for FDP State administration.
- **Geography.** We will ensure that there is at least one State from each of the seven FNS regional offices. This will help ensure we capture the full range of State interface with regional offices in gathering process data from the sampled States.

Upon OMB approval, the State Directors in the 12 selected States will receive a letter via email from their FNS Regional Office (Appendix B-2) notifying

them of their selection into the study, and alerting them that the research team will be contacting them shortly to schedule interviews. The research team will then contact each of the State Directors by telephone to schedule the pre-visit telephone and subsequent on-site interviews.

Pre-visit interviews will be administered over the telephone with an estimated 22 State Directors (Appendix C-1). During the pre-visit interview, the research team will obtain background information to facilitate the on-site interviews, including identification of key staff with responsibilities for SAE. On-site interviews will be administered in person with State Directors and their identified key staff (an estimated 22 State Directors and 66 key staff) (Appendix C-2). Interview questions cover State organizational structure, SAE spending patterns, factors affecting State use of funds, State policies and procedures, challenges faced and how these are overcome, and input on alternatives to the current formula. All data collected will be used to inform the primary research questions discussed above. Interview participation is voluntary and respondents are free to stop participation at any time. All interviews will be digitally recorded with the consent of each respondent. Email will be used to follow-up with respondents for any needed clarifications of information discussed during the interviews.

In preparation for study launch, interview guides were pre-tested to ensure that: (1) respondents interpret the questions as intended and can easily

respond; and (2) interviewers can easily administer the instruments. Pre-test interviews were conducted by telephone among a total of 5 respondents in the State of Arkansas: two staff from the State Department of Education, and three from the State Department of Human Services. Arkansas was chosen because multiple State agencies administer the Child Nutrition Programs, and it provided an opportunity to test the on-site interview guide with respondents who oversee different programs. In addition, historical SAE data for Arkansas show instances of recovery of SAE funds as well as receipt of additional funds through reallocation, both topics of focus in the interview guides. Interviews ranged from 45-90 minutes. Feedback from the pre-test interviews was used to refine questions that respondents found confusing, repetitive or ambiguous, as well as questions that interviewers found challenging to administer. Pre-testing also provided information on the time needed to conduct the interviews with respondents. As a result, we increased the time for the in-person interviews from 90 minutes to 2 hours.

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 of 2002, to promote the use of technology. This study primarily involves in-person, on-site interviews with designated key staff at State agencies; there is no requirement for study participants to complete any surveys. To the extent possible, contacts to arrange the on-site interviews will be made via email (Appendices B-4 and B-5), and a short pre-visit interview with the State agency director will be conducted by phone (Appendix C-1) to reduce participant burden and facilitate and reduce the burden of on-site data collection. FNS estimates that none of the responses will be collected electronically.

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 information collection. Every effort has been made to avoid duplication. Through careful review of the data requirements, we have determined that no current data are similar to that proposed for collection in this study. There has not been any comprehensive research conducted on the Child Nutrition SAE formula for more than 30 years.

A.5 Impacts Small Business or other Small Entities

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

The interviews will include only State employees. No small businesses or other small entities are impacted by this collection of information. For all respondents, information being requested or required has been held to the minimum required for the intended use.

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.

This is a voluntary one-time data collection activity and consists of a pre-visit telephone interview and an in-depth on-site interview. If the study is not conducted at this time, FNS will not have information on the effectiveness of the current SAE formula. The information is essential for policy makers and program staff making decisions about the use of SAE funds. They will use the information to assess opportunities for improving the allocation and utilization of SAE funds.

A.7 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;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade 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. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A.8 Responses to the Federal Register Notice and Efforts to Contact Outside Agencies

If applicable, 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.

In accordance with 5 CFR 1320.8(d), FNS published a notice on June 7, 2017, in the *Federal Register*, Volume 82, Number 108, Pages 26423-26425, and provided a 60-day period for public comments. The comment period closed on August 7, 2017; FNS received a total of 12 comments which are provided in Appendices D-1 through D-12. Comments were received from representatives of eight State agencies, two national advocacy organizations, one State-based advocacy organization, and one anonymous commenter. Commenters generally expressed support for the study and indicated the formula for SAE allocation should be updated. The State agency comments were from a mix of different sized States, including two small States and three of the largest States. The comments were related to: 1) State selection to participate in the study; 2) the unique challenges faced

by smaller States; 3) current challenges and experiences with SAE allocation and usage; and 4) suggestions for what to consider in developing and testing a new allocation formula. Seven of the commenters recommended expanding the study sample to increase the representativeness and diversity of the data collected. Two commenters specifically mentioned utilizing every State in data collection for a comprehensive review of experiences related to the current SAE formula. One commenter suggested that two separate interactions with State Directors may be too much. Five commenters expressed concern over changes to aspects of the SAE allocation process that are currently working well across States. Two commenters specifically mentioned the importance of maintaining the carryover and reallocation policies as part of SAE allocation. Several commenters provided descriptions of current difficulties and challenges faced by the States regarding SAE usage, allocation, and coverage. FNS responses to each comment are in Appendices E-1 through E-11. The responses provide information on the specific factors that will be used for selecting States to participate in the study. In addition, although the sample size of 12 States will not be increased, the responses indicate that FNS is committed to obtaining input from all State agencies, regardless of whether the State is included in the study sample for interviews. FNS has not yet decided on the method for obtaining input from all States. Input may be gathered at listening sessions with FNS officials and State agencies held at conferences or meetings that State agencies attend, or through a Request for Information published in the

Federal Register. The response to one commenter explains the purpose of the two contacts with the State Director, with the pre-visit telephone interview an important preparation for on-site visits. For other comments, which were not specifically related to specific elements of the information collection, the responses thank commenters for their input.

Five respondents served as participants in the pre-test efforts and were consulted about the burden estimate and other characteristics of the qualitative data collection (i.e., clarity of instruments): two key staff from the Arkansas Department of Education, as well as Tonya Williams the Division Director (501-682-1001), Tom Shephard the Nutrition Director (501-682-1001), and Tracy Shawn the Program Administrator (501-682-1001) from the Arkansas Department of Human Services' Special Nutrition Unit. The two key staff from the Arkansas Department of Education were under a confidentiality agreement and told their information (such as names) would not be shared. An additional consultant to the study included Sarah Goodale, Mathematical Statistician with the National Agricultural Statistical Service's Summary, Estimation, and Disclosure Methodology Branch, 202-690-8122 (Appendix F). Consultations about the research design, sample design, data sources and needs, and study reports occurred during the study's planning and design phase, and will continue throughout the study.

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.

There will be no incentives provided to respondents in this study.

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.

Study participants will be subject to assurances as provided by the Privacy Act of 1974 (5 USC §552a), which requires the safeguarding of individuals against invasion of privacy; these assurances will have been documented in an informed consent form found at the start of each interview guide (Appendices C1 and C2). In addition, all Westat project staff have signed a confidentiality and nondisclosure agreement (Appendix A-5). The information will be kept private and will not be disclosed to anyone but the researchers conducting this investigation, except as otherwise required by law. We will safeguard 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, which was published in the Federal Register on April 25, 1991 (56 FR 19078). Names and phone numbers will not be linked to participants' responses and analysis will be

conducted on data sets that include only respondent ID numbers. All data will be securely transmitted to Westat via secure fax, FTP site, prepaid sealed mailings, or phone; and will be stored in locked file cabinets or password-protected computers, and accessible only to Westat project staff. Names and phone numbers will be destroyed within 12 months after the end of the collection and processing period (approximately 09/2020). Westat's Institutional Review Board (IRB) is the organization of record overseeing all human subjects' activities for the study. A copy of the IRB approval letter is in Appendix A-4.

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.

In general, questions on planning for and managing SAE allocations are not considered to be sensitive. Participants can choose to skip any question, or to discontinue participation in the study. The majority of questions required for the interviews were pre-tested (Appendices C-3 and C-4) and no participants expressed unwillingness to answer the questions.

A.12 Estimates of Respondent Burden Including Annualized Hourly Cost

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

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

With this submission, there are 88 respondents, 366 responses, and 228.0 burden hours. Please see the detailed burden chart here and in Appendix A-6. Information about the planning and usage of SAE funds will be collected from FNS State directors and key staff. The burden table (Appendix A-6) presents the number of respondents, frequency of response, and annual hour burden to collect these data. The assumptions used to estimate burden are based on the research team's professional experience and survey expert simulation testing for timing of the interviews.

- **State Child Nutrition Directors.** The sample size of State Child Nutrition Directors is 22. Participant burden includes time to read communication materials, schedule a pre-visit and on-site interview, participate in the pre-visit and on-site visit interview as well as follow-up to the interview, if needed.

- **State Child Nutrition Key Staff.** A total of 66 key staff will complete an on-site in-depth interview. Sixty-six key staff will participate in the on-site interviews intended specifically for key staff who are involved with the planning and use of SAE funds. Participant burden also includes time to read communication materials, schedule the on-site visit interview and follow up after the interview, if needed.

The estimates of respondent cost are based on the burden estimates and use the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Occupational and Wage Statistics. Occupational Group (999200) State Government (excluding schools and hospitals) was used to estimate annualized costs for managers or directors at the State agencies. Annualized costs were based on the mean hourly wage for each job category.

The hourly wage rate used for the State CN Director and key staff is \$43.82 (Occupation Code 11-9030, State Government-999200), found at http://www.bls.gov/oes/current/naics4_999200.htm. The State CN Director and key staff total 228.0 burden hours, which is \$9,989.52. The total estimated annualized cost is \$9,989.52.

No respondents will be asked to keep records of data; therefore no burden hours have been estimated for recordkeeping.

Table A12.1 Burden Table

Respondent Type	Respondent Description	Type of Survey Instrument	Appendix	Sample size (a)	Number of	Frequency of Response (annual)	Total Annual Responses	Average Hours per Response	Sub-Annual Burden	Number of non-	Frequency of	Total Annual	Average Hours per	Sub-Total Annual	Total Burden Hours	Hourly Wage Rate	Total Annualized Cost of Respondents Burden
State Child Nutrition Agency	State Director	Electronic study notification letter	B-2	22	22	1	22	0.083	1.833	0	0	0	0.000	0.0	1.833	\$43.82	80.32
		Call to schedule the pre-visit telephone interview	B-3	22	22	1	22	0.167	3.667	0	0	0	0.000	0.00	3.667	\$43.82	160.68
		Email to schedule the on-site in-depth interview	B-4	22	22	1	22	0.167	3.667	0	0	0	0.000	0.00	3.667	\$43.82	160.68
		State Director pre-visit telephone interview	C-1	22	22	1	22	0.750	16.500	0	0	0	0.000	0.00	16.500	\$43.82	723.03
		State Director on-site in-depth interview	C-2	22	22	1	22	2.000	44.000	0	0	0	0.000	0.00	44.000	\$43.82	1928.08
		State Director interview follow-up email	B-6	7	7	1	7	0.167	1.167	0	0	0	0.000	0.00	1.167	\$43.82	51.13
		State Director thank you email	B-7	22	22	1	22	0.017	0.367	0	0	0	0.000	0.00	0.367	\$43.82	16.08
	Key Staff	Pretest of the previsit telephone interview	C-3	2	2	1	2	0.750	1.500	0	0	0	0.000	0.00	1.500	\$43.82	65.73
		Pretest of the site visit interview	C-4	5	5	1	5	1.500	7.500	0	0	0	0.000	0.00	7.500	\$43.82	328.65
		Email to schedule the on-site in-depth interview	B-5	66	66	1	66	0.167	11.000	0	0	0	0.000	0.00	11.000	\$43.82	482.02
		Key Staff on-site in-depth interview	C-2	66	66	1	66	2.000	132.000	0	0	0	0.000	0.00	132.000	\$43.82	5784.24
		Key Staff interview follow-up email	B-6	22	22	1	22	0.167	3.667	0	0	0	0.000	0.00	3.667	\$43.82	160.68
		Key Staff thank you email	B-7	66	66	1	66	0.017	1.100	0	0	0	0.000	0.00	1.100	\$43.82	48.20
GRAND TOTAL *				88	88	4.16	366	0.623	227.967	0	0.0	0.0	0.00	0.00	227.967	--	9,989.52

*Figures may not compute due to rounding.

A.13 Estimates of Other Total Annualized 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 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.

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

A.14 Annualized Cost to the 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 total cost to the Federal Government is \$801,590.48 over the 36 month period of the contract. The largest cost to the Federal Government is to pay the contractor \$778,930.00 to conduct this study and deliver reports and data files. The annual cost is \$267,196.83.

The information collection also assumes a total of 480 hours of a Federal Employee's time per year: for a GS-13, Step 1 in the Washington, DC area, at \$45.42 per hour for a total of \$21,801.60. The information collection also assumes a total of 16 hours of a Branch Chief's time per year: for a GS-14,

Step 1 in Washington, DC area, at \$53.68 per hour for a total of \$858.88.

Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2017 for the Washington, DC, metro area locality (for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA).³

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 information request which will add 228.0 total annual burden hours and 366 total annual responses as program changes to OMB's burden 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.

Table A16.1 shows the data collection, analysis, and reporting schedules for the final briefing and report.

³ Office of Personnel Management, General Schedule, accessed February 21, 2017, at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf

Table A16.1. Reporting Schedule

Activity	Schedule
Instrument Pre-testing	April -May 2017
Train Data Collectors	Within 1 month of OMB approval (estimated June 2018)
Conduct Data Collection	5 month period following completion of training
Analyze Data	6 month period following data collection
Draft Report and Briefing Materials	7 months after data collection
Final Report and Briefing Materials	9 months after data collection
Delivery of data files	At conclusion of project

A.17 Reason 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.

All data collection instruments will display the OMB control number and expiration date.

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.”

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-i.

