



United States Department of Agriculture

TO: Steph Tatham, OMB Desk Officer  
Office of Information and Regulatory Affairs  
Office of Management and Budget

**Agriculture**

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

Food and Nutrition Service

3101 Park Center Drive

FROM: Rachelle Ragland Greene **rg**  
FNS Information Collection Officer, Planning & Regulatory Affairs  
Food and Nutrition Service

Alexandria, VA 22302-1500

SUBJECT: Request approval add new data collection instruments through OMB Control No: 0584-0616 (Expiration 11/3/2019): Evaluation of the Food Insecurity Nutrition Incentives (FINI)

The Agricultural Act of 2014 (P.L. 113-79) authorized USDA to provide FINI grants to eligible organizations, to design and implement projects to increase purchases of fruit and vegetable among low-income consumers participating in the Supplemental Nutrition Assistance Program (SNAP), by providing incentives at point of sale. USDA has awarded FINI grants to organizations since 2015, with the final round of awards in 2018. Data collection from 2015, 2016, and 2017 FINI grant awardees has been previously approved under OMB Control No. 0584-0616.

FNS is interested in understanding how FINI works in grocery store retail settings. Although, we have conducted two waves of surveys of FINI retailers, most of the respondents have been farmers markets. Few grocery stores were implementing FINI during the first two waves of this survey: 66 grocery stores were implementing FINI during the first wave of the survey and 115 were implementing FINI during the second wave of the survey. The small number of responding grocery stores (30 in wave 1 of the Retailer Survey and 49 in the second wave) did not allow for analyses of grocery store retailer experiences.

To address this challenge, the research team will utilize a three-fold approach: 1) increase the number of grocery stores surveyed, 2) add telephone follow-up to improve response rates, and 3) refine the outlet survey questions and responses.

First, the outlet survey will be sent to all grocery stores with active FINI programs in calendar year 2018. This would allow all grocery stores from all grant cycles offering FINI to respond to the survey. It should also give time for some of the new 2018 retailers to participate. For point of reference, in quarter 1 of calendar year 2018, about 450 grocery stores were actively offering FINI—this would be a much larger starting sample than the previous waves of the survey. Grocery stores operating in calendar year 2018 will be identified from the quarterly administrative data provided by grantees in 2018. OMB has approved outlet survey administration for 3,600 retailers; limiting survey administration to grocery stores will result in 2,930 fewer outlet surveys.

Second, the primary mode of response will remain a mail survey, but will also include phone follow-up to contact non-responding grocery stores. A Help Desk line will be available for retailers to call in for assistance with the survey or to request to complete the survey over the phone.

Finally, the outlet survey will be customized to include questions that are relevant to grocery stores only. We will also refine the outlet survey by introducing close-ended questions developed from themes found in response to open ended questions in prior outlet surveys.

Through this memorandum, we are requesting approval for the following: (i) limit the outlet survey administration to grocery stores operated through 2017 and 2018 grant awards (exclude farmers markets, direct marketing farmers, mobile markets, and CSAs), (ii) field a second round of outlet survey for grocery stores that are implementing FINI through 2015 or 2016 grant awards, and (iii) expand the data collection protocol to include a second survey mailing, second postcard reminder, and conduct telephone follow-up with non-responding grocery stores and (iv) make minor revisions to the outlet survey questions and response options, to focus exclusively on FINI implementation at grocery stores.

Table 1 depicts the changes in the data collection activities that will be implemented following OMB approval. Table 2 provides the requested burden hours by data collection activity. Appendices AK, AL, AM, and AG2 include the Outlet Survey Second Mailing, Outlet Survey Second Reminder Postcard, Outlet Survey Telephone Follow-Up Script, and Revised Outlet Survey respectively.

**Table 1. Approved and Proposed Outlet Survey Administration**

Outlet Survey	Data Collection in 2018/2019	
	Approved	Proposed
Survey instrument	Generic survey for Grocery stores, Direct marketing farmers, and CSAs; separate survey for farmers markets	Limit to grocery stores only; survey enhancements to make the survey relevant to grocery stores only
Data collection mode	Invitation letter, reminder postcard, grantee follow-up, and thank you letter.	Invitation letter, reminder post-card, second survey mailing, second reminder postcard, grantee follow-up, telephone follow-up, and thank you letter.
FINI Retailers funded through 2017 and 2018 grant cycle	All retailers (N =3,600)	Grocery stores only (N=266)
FINI retailers funded through 2015 and 2016 grant cycle	None	Grocery stores only (N =404)
Respondent burden	10 minutes per survey	12 minutes per survey

Including respondents and non-respondents, currently there are 14,939 respondents and we estimate there will be a decrease of 2,930 respondents for a total of 12,009 respondents. Due to an oversight, the current total responses should have been 76,637 and we are now requesting 70,424 total responses, a decrease of 6,213 total responses; however the total responses in ROCIS is 65,457 and we are requesting 70,424 which is an increase of 4,967. The current burden in ROCIS should have been 5,625 hours but due to oversight the burden wasn't increased in the system. Based on the revisions, we estimate the revised burden is 4,977 hours an overall decrease of 648 burden hours; furthermore, ROCIS reflects an increase of 476 burden hours.

	Original Estimates Approved Nov 4, 2016	Requested Additional Burden Nov 7, 2017	Current Estimates Approved Jan 8, 2018	Requested Revised Burden Nov 16, 2018
<b>Total Respondents and Non-respondents</b>	11,286	3,649	14,939	<b>12,009</b>

<b>Total Burden Hours</b>	4,501	1,124	5,625	<b>4,977</b>
<b>Total Responses</b>	65,457	12,925	78,382	<b>70,424</b>

However, ROCIS reflects a current total of responses as 65,457 and total annual burden as 4,501 which was the original request; this error occurred during the last two change justifications approvals, FNS didn't make the adjustments in ROCIS to reflect the requested burden estimates.

If you have any questions regarding this request, please contact Rachelle Ragland-Greene, FNS Information Collection Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2586.