

**FNS GENERIC CLEARANCE FOR PRE-TESTING,  
PILOT, AND FIELD TEST STUDIES**

**OMB# 0584-0606**

**REQUEST FOR OMB CLEARANCE**

**Supporting Statement Part A**

**Prepared by:**

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**Food and Nutrition Service (FNS)  
U.S. Department of Agriculture**

**March 12, 2019**

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## A. JUSTIFICATION

**Terms of Clearance:** This information collection was approved on March 24, 2016 with the following terms of clearance: “Before a testing activity is undertaken, FNS will provide the Office of Management and Budget (OMB) with a memo describing the purpose of the study to be conducted, the sampling approach, the study design, and a copy of questionnaires and debriefing materials to be used.” The Food and Nutrition Service (FNS) described the contents of the generic submissions in the initial submission and will continue to submit the generic submissions as described in this extension request and in accordance with the terms of clearance.

### 1. Necessity of Information Collection

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

This is a request for an extension of a currently approved information collection, without change for a generic clearance for the Food and Nutrition Service (FNS) that will allow FNS to develop, test, and improve its survey and assessment instruments and methodologies. The procedures utilized to this effect include but are not limited to experiments with levels of incentives for study participants, tests of various types of survey operations, focus groups, pilot testing, exploratory interviews, experiments with questionnaire design, and usability testing of electronic data collection instruments.

This generic testing clearance is a helpful vehicle for evaluating questionnaires/assessments and various data collection procedures. It will allow FNS to take advantage of a variety of methods to identify questionnaire/assessment and procedural problems, suggest solutions, and measure the

relative effectiveness of alternative solutions. Through the use of these techniques in the testing phase of FNS surveys, questionnaires and assessments, FNS anticipates simplifying instruments for respondents, reducing respondent burden, and improving the quality of information collection instruments, which should increase the quality of the data collected through these instruments.

This request for clearance provides a description of the scope of possible activities that might be covered. We anticipate using the generic clearance for all FNS programs for which studies and evaluations are conducted, which includes, but is not limited to the Supplemental Nutrition Assistance Program (SNAP), Child Nutrition Programs (such as the National School Lunch and Breakfast Programs, Summer Feeding Programs, etc.), Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), and Food Distribution Programs. As part of this extension request, FNS is also including two generic information collection submissions, for the Pretesting Instruments for the Survey of SNAP and Work (Appendix A) and the School Nutrition and Meal Cost Study-II, Outlying Areas Cost Study Feasibility Reassessment (Appendix B), that were recently approved by OMB. FNS is including them in this request because the data collection activities will not be completed before the expiration date of this information collection. FNS estimates that the current burden estimates will be enough to cover these submissions, plus any new submissions that will be submitted after this extension is approved.

FNS will identify the relevant authorizing statutes for data collections submitted under this generic clearance with each generic IC submission to OMB. In most cases, the following authorizing statutes apply:

- The Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296, Sec. 305) mandates programs under its authorization to cooperate with U.S. Department of Agriculture (USDA) program research and evaluation activities (Appendix C).
- Section 17 [7 U.S.C. 2026] of the Food and Nutrition Act of 2008 provides general legislative authority for the planned data collection. This section authorizes the Secretary of Agriculture to enter into contracts with private institutions to undertake research that will help to improve the administration and effectiveness of SNAP in delivering nutrition-related benefits (Appendix D).

The specific methods proposed for coverage by this clearance are described in Part B.

### **Procedures for Clearance**

Before a testing activity is undertaken, FNS will provide the Office of Management and Budget (OMB) with a memo describing the purpose of the study to be conducted, the sampling approach, the study design, and a copy of questionnaires and debriefing materials to be used.

Depending on the stage of questionnaire development, this may be a printed questionnaire, a set of prototype items showing each item type to be used and the range of topics to be covered by the questionnaire, or an interview script. When split sample experiments are conducted, either in small group sessions or as part of a field test, the different version questionnaires to be used will be provided. For a test of alternative procedures, the description and rationale for the procedures will be submitted. A brief description of the planned field activity will also be provided.

## **2. 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 the actual use the agency has made of the information received from the current collection.**

This is an extension of a currently approved information collection request, without change. The survey activities typically submitted under this generic will be voluntary, although mandatory surveys may also be submitted. The information collected will be used by FNS to pre-test, evaluate and improve the quality of survey instruments and provide reassessments before they are conducted. None of the data collected under this clearance will be published for its own sake. Because the questionnaires being tested under this clearance are still in the process of development, the data that result from these collections are not considered official statistics of FNS. When necessary, FNS will provide screenshots of any web-based system we or our contractors may deploy and will also provide all English and Spanish translations of the instruments. Data will be used to finalize survey instruments before requesting and submitting a separate OMB information collection request (ICR) under the regular ICR submission. Data will not be made public, except when included in the final information collection request since research reports will be prepared for sponsors inside and outside of FNS. The results may also be prepared for presentations related to survey methodology at professional meetings or publications on the FNS website and in professional journals.

### **3. Use of Information Technology**

**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.**

When the survey or assessment being tested employs automated methods for its data collection, the research conducted under this submission will also use automated data collection techniques, whenever feasible; and, any electronic systems and percentage of submissions expected to be

submitted electronically will be identified in each supplemental generic ICR in English and if offered, in Spanish.

#### **4. 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 purpose described in item 2 above.**

Research under this clearance does not duplicate any other questionnaire design work being done by FNS or other Federal agencies. FNS solely monitors and administers the programs for which information collections will be submitted under this clearance. Additionally, to the extent possible, FNS makes use of existing information, including reviewing results of previous evaluations of survey data; however, such information is typically not sufficient to refine survey questionnaires without conducting additional research. If any administrative data will be used, the program will identify the OMB control number and expiration date to avoid duplication of any reporting burden estimates. Generally accounting for burden associated with reporting this information to FNS or its contractors includes; but is not limited to; training on how to report, gathering, compiling, transmitting or recordkeeping burden estimates.

#### **5. Impacts Small Businesses or Other Small Entities**

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

This research will be designed as relatively small-scale data collection efforts so as to minimize the amount of burden required to improve questionnaires and procedures, test new ideas, and refine or improve upon positive or unclear results from other tests. The results of the research conducted under this clearance are expected to improve the methods and instruments utilized in



full scale studies and thereby improve information quality while minimizing burden to respondents.

## **6. Consequences of Less Frequent Collection**

**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 an ongoing, data collection to pretest questionnaires and survey instruments. Typically, the data collections submitted under this generic are voluntary, but mandatory data collections may also be submitted. Without questionnaire development testing, the quality of the data collected in full surveys would suffer. Additionally, conducting pre-testing in advance of full surveys will enable the agency to produce more timely studies.

## **7. Special Circumstances**

**Explain any special circumstances that would cause an information collection to be conducted in a manner that is inconsistent with 5 CFR 1320.5.**

- **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

#### **8. Federal Register Comments and Consultations Outside the Agency**

**If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.**

As required by 5 CFR 1320.8(d), a 60-day Federal Register Notice was published in the Federal Register on September 14, 2018 (Vol. 83, page 46698). The public comment period ended on November 13, 2018. FNS received one public comment from the School Nutrition Association recommending that FNS create a working group of school nutrition professionals to serve as a pre-testing group of content specialists. They also recommended that FNS eliminate redundancies and utilize state agencies' comprehensive data collection from monthly reports, annual reports, and administrative reviews; that the format of data collections should allow SFAs to submit or upload requested information in their own format, and that FNS should work to reduce the long lag time between data collection and the publication of reports to ensure that the information remains relevant (Appendix E).

In response to the comment, FNS replied that the Generic Clearance to Conduct Pre-Testing of Surveys is a clearance vehicle that various programs in FNS use to conduct pre-testing, pilots, and field tests for studies that will later become full-blown study efforts and that their suggestions for improving the quality and usability of the information and to reduce the burden related to the pre-testing activities will be forwarded for consideration (Appendix F).

Efforts to consult with potential respondents and stakeholders to obtain their views on the availability of data, clarity of instructions, etc., may be undertaken as part of the testing that is conducted under this clearance. Additionally, FNS will continue to work with National Agricultural Statistics Service (NASS) on any and all a collections that employs statistical methodologies.

#### **9. Payment or Gift to Respondents**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Respondents who participate may receive food, monetary incentives or gifts as a token of our appreciation which are often used to off-set expenses for travel and/or child-care. This practice has proven necessary and effective in recruiting subjects to participate in such research. Research on incentives that may be conducted under this clearance may also involve nonmonetary incentives. If incentives need to be proposed for any research activity under this clearance, justification will be provided and FNS will work closely with OMB on the incentive strategy to be employed. FNS will typically propose incentives at the level currently approved by OMB. If a higher level incentive or cash incentive is proposed for approval, a meaningful justification will be provided.

#### **10. Assurance of Confidentiality**

**Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Participants in this study will be subject to safeguards as provided by the Privacy Act of 1974 (5 USC 552a), which requires the safeguarding of individuals against invasion of privacy.

Information provided by respondents will be kept secure to the extent provided by law. This will be communicated to respondents by means of introductory letters, follow-up emails or postcards,

explanatory texts on the cover pages of questionnaires, public burden statements and scripts read prior to focus groups or telephone interviews, receipts and consent forms, where necessary. Respondents will also be advised of the following: the nature of the activity; the legal authority, purpose and use of the data collected; and whether their participation is voluntary or mandatory. For voluntary activities, respondents will be assured that there will be no penalties or loss of benefits if they decide not to respond, either to the information collection as a whole or to any particular questions. In some cases, FNS may desire to record the interview or session. In these cases, we will make it clear to the respondent that their decision whether or not to agree to the recording is voluntary, even in cases where it is mandatory that the respondent participate in the interview or focus group.

A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the Federal Register on April 25, 1991, Volume 56, Pages 19078-19080 discusses the terms of protections that will be provided to respondents. The generic information collection submissions will indicate whether the particular study requests any personally identifiable information or whether any of the surveys and other data collection instruments require a Privacy Act Statement.

All project/contractor staff conducting the information collection will identify safeguards and sign a confidentiality agreement, and all electronic and hard-copy data will be maintained securely throughout the information collection and data processing phases. While under review, electronic data will be stored in locked files on secured computers; hardcopy data will be maintained in secure building facilities in locked filing cabinets or for studies conducted in the field hardcopy data will be maintained in a locked trunk until the contractor has returned to their building. This information is destroyed after the study and reports have been finalized.

## **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.**

Most of the questions that are included on FNS instruments are not of a sensitive nature.

However, it is possible that some potentially sensitive questions may be included in instruments that are tested under this clearance. One of the purposes of the testing is to identify such questions, determine sources of sensitivity, and alleviate them, if feasible, before the actual survey is administered. In cases where sensitive questions are necessary to the study, these sensitivities will be highlighted in the generic submission for OMB clearance.

## **12. Estimate of Hour Burden Including Annualized Hourly Costs**

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

- **Indicate the number of respondents, frequency of response, average time to respond, annual hour burden, forms number if applicable 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.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Affected public: State, Local and Tribal agencies; Business (for-not-for-profit) or

Individuals/Households (I/H). We estimate that an average of 2,200 respondents (6,600 over the three year period) will participate in FNS pre-testing, pilots and field study activities in a given year and the average annual respondent burden is estimated to be 1,500 hours. For the full three years there will be an estimated 4,500 hours of burden. Annualized estimates of respondent burden for each of the data collection types are provided below.

Please note that this extension request includes two generic information collection submissions, the Pretesting Instruments for the Survey of SNAP and Work and the School Nutrition and Meal Cost Study-II, Outlying Areas Cost Study Feasibility Reassessment, that were recently approved by OMB. FNS included these items in this extension request because the data collection activities are still ongoing. FNS estimates that the current burden estimates will cover these submissions, in addition to the new pre-testing, pilot, or field test studies that may be submitted under the generic clearance.

Table 1: Respondent Burden Table

<b>Types of Respondents</b>	<b>Instrument</b>	<b>Estimated Number of Respondents</b>	<b>Estimated Frequency # of Responses per Respondent</b>	<b>Estimated Total Annual Responses</b>	<b>Estimated Average Hours per Response (in hours)</b>	<b>Estimated Total Burden Hours</b>
I/H	Screening/Recruitment	500	1	500	0.25	125
	Interviews / Focus Groups	150	1	150	1.50	225
	Surveys/ Questionnaires	150	1	150	1.00	150
<b>I/H Subtotal</b>		<b>800</b>	<b>1</b>	<b>800</b>	<b>0.625</b>	<b>500</b>
SLT	Screening/Recruitment/ Pilot Applications	300	1	300	0.25	75
	Interviews / Focus Groups	150	1	150	1.50	225
	Surveys/ Questionnaires	150	1	150	1.00	150
	Pilot Applications	100	1	100	0.50	50
<b>SLT Subtotal</b>		<b>700</b>	<b>1</b>	<b>700</b>	<b>0.714285</b>	<b>500</b>
Business	Screening/Recruitment/ Pilot Applications	300	1	300	0.25	75
	Interviews / Focus Groups	150	1	150	1.50	225
	Surveys/ Questionnaires	150	1	150	1.00	150
	Pilot Applications	100	1	100	0.50	50
<b>Business Subtotal</b>		<b>700</b>	<b>1</b>			<b>500</b>
<b>Grand Total</b>		<b>2200</b>	<b>1</b>	<b>2200</b>	<b>0.68181</b>	<b>1500</b>

The estimated annual cost, including respondent costs of \$30,610 and a fully-loaded wage rate of \$10,101.30 (33% of \$30,610) is \$40,711.30. The wage rates for the State, Local and Tribal government respondents come from the U.S. Department of Labor, Bureau of Labor Statistics and use the mean for Federal, State, and Local Government NAICS 999000 for the State Local and Tribal government respondents; and BLS category 21-0000 for Community and Social Service workers for businesses. Minimum wage is used for the individuals/households. The BLS wage rates are based upon May 2017 data, the latest available as of this submission ([http://www.bls.gov/oes/current/oes\\_nat.htm](http://www.bls.gov/oes/current/oes_nat.htm)).

Table 2: Respondent Annual Cost Table

<b>Types of Respondents</b>	<b>Instrument</b>	<b>Estimated Total Burden Hours</b>	<b>Wage Rate</b>	<b>Estimated Annual Cost to the Respondent</b>
I/H	Screening/Recruitment	125	\$ 7.25	\$ 906.25
	Interviews / Focus Groups	225	\$ 7.25	\$ 1,631.25
	Surveys/ Questionnaires	150	\$ 7.25	\$ 1,087.50
<b>I/H Subtotal</b>		<b>500</b>		<b>\$ 3,625.00</b>
SLT	Screening/Recruitment/Pilot Applications	75	\$ 28.88	\$ 2,166.00
	Interviews / Focus Groups	225	\$ 28.88	\$ 6,498.00
	Surveys/ Questionnaires	150	\$ 28.88	\$ 4,332.00
	Pilot Applications	50	\$ 28.88	\$ 1,444.00
<b>SLT Subtotal</b>		<b>500</b>		<b>\$ 14,440.00</b>
Business	Screening/Recruitment/Pilot Applications	75	\$ 25.09	\$ 1,881.75
	Interviews / Focus Groups	225	\$ 25.09	\$ 5,645.25
	Surveys/ Questionnaires	150	\$ 25.09	\$ 3,763.50
	Pilot Applications	50	\$ 25.09	\$ 1,254.50
<b>Business Subtotal</b>		<b>500</b>		<b>\$ 12,545.00</b>
<b>Grand Total</b>		<b>1500</b>		<b>\$ 30,610.00</b>

### 13. Estimates of Other 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.**

No capital, start-up, or ongoing operation or maintenance costs are associated with this data collection.

#### **14. Annualized Cost to 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 cost to the Federal Government will be dependent on the number of Federal employees involved in each pre-testing submission and the associated contractor costs. However, we estimate that a Social Science Analyst will spend approximately 1,000 hours per year overseeing the pre-testing efforts and a program Branch Chief who will approve the generic clearances will spend about 100 hours per generic submission. In 2019, a Social Science Analyst GS-12, step 6 hourly wage rate for the Washington, DC locality is \$45.59; the annual estimated costs is \$45,590 annually. The Branch Chief GS-14 Step 1 hourly wage rate for the Washington, DC locality is \$54.91 hourly; the annual estimated costs is \$5,491. The cost for the Federal staff time, including an additional \$16,856.73 to account for a fully-loaded wage rate ( $\$51,081 \times 33\%$ ) is \$67,937.73 annually (this figure doesn't include contract cost which will be identified in the supplement generic ICR).

#### **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-I.**

This is an extension of a currently approved information collection request, without change.

FNS estimates that the burden for this collection will remain unchanged at 1,500 annual burden



hours and 2,200 annual responses (4,500 burden hours and 6,600 responses over three years). As part of this extension request, FNS is removing \$28,095 in costs that were mistakenly entered for this collection. These are respondent annual costs that are reported under A.12, and not the capital, start-up, or ongoing operation or maintenance costs reported under A.13 that are reported as part of the information collection burden.

#### **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. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

This clearance is for developing, testing, and improving survey and assessment instruments and methodologies. Data tabulations will be used to evaluate the results of instrument testing. The information collected in this effort will not be the primary subject of any published reports; however, information might be included as a methodological appendix or footnote in a report containing data from a larger data collection effort. The results of this pre-testing research may be prepared for presentation at professional meetings or publication in professional journals. Due to the nature of this clearance, there is no definite or tentative time schedule at this point. The project schedule will be detailed in each submission under this generic collection for OMB clearance.

#### **17. Request to Not Display 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.

### **18. Exceptions to the Certification**

**Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act” of OMB Form 83-I. Part V “Certification Requirement for Paperwork Reduction Act.” If Agency is not requesting an exception, the standard statement should be used.**

There are no exceptions to the certification statement. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.