

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-NEW:**

**Evaluation of the Direct Certification with Medicaid for  
Free and Reduced-Priced (DCM-F/RP) Meals Demonstrations**

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PART A: JUSTIFICATION

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A.1. Explanation of Circumstances That Make Collection of Data Necessary

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

The National School Lunch Program (NSLP) and the School Breakfast Program (SBP) are the cornerstones of the government’s efforts to provide nutritious meals to school children. All children enrolled in schools participating in the school meal programs are eligible to receive school meals. Although the U.S. Department of Agriculture/Food and Nutrition Service (USDA/FNS) subsidizes all school meals that meet program requirements, the subsidies are much larger for meals provided to children certified for free or reduced-price meals. Historically, most students have become certified for free or reduced-price meals through an application process. In recent years, however, more students have been automatically determined eligible for free meals through direct certification. Direct certification is conducted by matching school enrollment records with public assistance program records. Students can be directly certified if their families participate in certain public assistance programs such as the Supplemental Nutrition Assistance Program (SNAP); these families do not need to complete an application. Direct certification has improved access to free school meals while easing the burden for families and district staff by reducing the use of household applications as well as the number of students subject to verification of school meal benefit eligibility.

Section 104 of the Child Nutrition and WIC Reauthorization Act of 2004 (P. L. 108-265) amended section 9(b) of the Richard B. Russell National School Lunch Act (NSLA) (42 U.S.C. 1758(b)) to require all local educational agencies (LEAs)<sup>1</sup> that participate in the NSLP and/or

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<sup>1</sup> Because nearly all schools in the NSLP/SBP are parts of entities commonly known as school districts, we use that term in the rest of this document instead of LEA or School Food Authority (SFA) to refer to local entities that enter into agreements with State Agencies to operate the NSLP and SBP.

SBP to establish a system to directly certify as eligible for free school meals children who are members of households receiving assistance under SNAP (Appendix H.1). Section 103 of Public Law 111–296, the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), amended the NSLA to authorize the USDA’s Food and Nutrition Service (FNS) to conduct and evaluate multiyear demonstration projects beginning in July 2012 in selected States and school districts to test the effectiveness of direct certification using income data available in Medicaid administrative records to determine eligibility for free school meals (Appendix H.2).

FNS authorized a demonstration beginning in School Year (SY) 2012–2013 for selected States and districts to directly certify students for free meals using income data available through Medicaid, hereby referred to as DCM. Evaluations of these demonstrations were conducted and published by FNS.

Beginning in SY 2016–2017, FNS initiated a new demonstration of Direct Certification with Medicaid for Free and Reduced-Price Meals, under the administrative pilot authority in Section 18(c) of the NSLA. This demonstration, hereby referred to as DCM-F/RP differs from the previous DCM demonstration in two key ways. First, the selected States will use income data from the Medicaid files to identify students in households eligible to receive reduced-price meals and directly certify them at that level, in addition to directly certifying students for free meals. Second, guidelines for assessing eligibility were revised to reflect changes in Medicaid income and household definitions under the Patient Protection and Affordable Care Act (ACA) of 2010.

FNS solicited applications from States to participate in DCM-F/RP, and purposively selected seven States from among those that applied to begin conducting DCM-F/RP: California, Florida, Massachusetts, Nebraska, Utah, Virginia, and West Virginia. Eight additional States were purposively selected to begin the DCM-F/RP demonstration in SY 2017–2018:

Connecticut, Indiana, Iowa, Michigan, Nevada, Texas, Washington, and Wisconsin. This brings the total number of States participating in the DCM-F/RP demonstrations to 15 in SY 2017-2018. The Request for Application for the demonstration included a requirement that agencies participating in the demonstration provide data for the evaluation.

FNS now seeks approval to conduct data collection as part of the Evaluation of the DCM-F/RP Demonstration. The study will help FNS understand how States are implementing the demonstration, identify challenges encountered, and examine the demonstration's effectiveness in improving certification and participation outcomes and the implications for Federal reimbursement totals and State administrative costs. This information will help FNS identify best practices that will shape future replication and improvement under wider rollout of the policies. HHFKA also authorized the evaluation to access data for the purposes of conducting demonstration projects, program monitoring, evaluations, and performance measurements of States and school districts participating in the Child Nutrition Programs and mandates the cooperation of relevant State Agencies.

The demonstration extends the use of direct certification to Medicaid-enrolled students who are from low-income families but are not directly certified through SNAP or other programs. DCM-F/RP is expected to expand the number of students who are certified for F/RP without completing an application. It might also increase the total number of students who receive F/RP meals by reaching students who are eligible but are not certified under standard procedures. If DCM-F/RP leads to an increase in the number of F/RP meals served, it will affect Federal meal reimbursement costs. In addition, it could affect the costs that States incur certifying students for NSLP and SBP benefits.

Data collection for SY 2016–2017 was covered in a previous OMB submission (Generic OMB clearance number 0584-0606 – Pretest for Evaluation of Direct Certification with Medicaid Demonstrations; clearance date 12/19/2016). This previous data collection included site visits, on-site and telephone interviews, administrative record collection, and cost log collection with 96 participants from State Child Nutrition Agencies, State Medicaid Agencies, and School Districts. The results of this data collection were used to inform the present OMB package submission. The current package requests clearance for data collection activities in SY 2017–2018, as discussed in more detail in A.2.

#### A.2. How the Information Will Be Used, by Whom, and for What Purpose

**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.**

This is a new information collection request. The DCM-F/RP study will explore the processes State Agencies and school districts use to implement the demonstration. It will also identify the potential effect of DCM-F/RP on students' certification for free and reduced-price NSLP and SBP meals and participation, and the effect on State and Federal costs for SY 2017-2018. Under Section 103 of Public Law 111–296, the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) has authorized the evaluation to access data for the purposes of conducting demonstration projects, program monitoring, evaluations, and performance measurements of States and school districts participating in the Child Nutrition Programs and mandates the cooperation of relevant State agencies.

We will collect four key types of data:

1. On-site interviews and observations (Appendices A-3a through A-3c and A-4);
2. Site visit follow-up telephone interviews (Appendices A-6a through A-6c);



3. Administrative data on certification and participation (Appendix B-2); and
4. State-level cost data (Appendices C-3a and C-3b and C-4).

We discuss each type of data below.

**a. On-Site Interviews and Observations**

To document DCM-F/RP processes, we will use in-depth case studies that trace the relevant direct certification workflow step by step. The core of these studies will be in-person site visits in each participating State, during which we will interview program and technical staff at the State and district levels who are involved in implementing DCM-F/RP. Respondents will include district staff and staff from State Child Nutrition and Medicaid Agencies, as well as staff from other State Agencies and vendors that play key roles in the direct certification process in some States. Interviews will provide detailed descriptions of DCM-F/RP procedures at the State and district levels and specific changes needed to initiate DCM-F/RP (interview protocols are in Appendices A-3a-c). We will ask open-ended questions and follow up with probes based on the information the respondent provides.

During the site visits, we will also conduct observations of key steps in the DCM-F/RP process. We will ask technical staff to show us how they complete steps such as accessing and reviewing data, assessing eligibility, conducting data matching, and certifying matched students in point-of-sale systems. On-site interviews will be conducted a single time per respondent.

**b. Site Visit Follow-Up Telephone Interviews**

Later in the school year, we will conduct telephone interviews (Appendices A-6a through A-6c) with respondents at the State Child Nutrition and Medicaid Agencies and districts included in the site visits. These interviews will provide updated information on how the DCM-F/RP demonstration has changed in each State since the site visits. They will also provide an opportunity to learn whether and how challenges identified during the site visit have been

resolved, and explore any additional challenges that emerged later. Follow-up interviews will be conducted a single time per respondent.

**c. Administrative Data on Participation and Certification**

We will collect administrative data from State Child Nutrition Agency staff on certification and meal participation for all school districts in each demonstration State. Administrative data will include information on certification (number of students by category—i.e., free, reduced-price, or paid—and the method and basis of certification), as well as on participation (number of meals served by category) in the NSLP and SBP. This data is necessary to evaluate changes in participation and certification rates resulting from the demonstration.

The data will be collected a single time for both the demonstration school year and the year before the demonstration began to enable pre-post comparisons. The data can be prepared in any standard format, but Microsoft Excel or SAS file formats are preferred. Details of the data elements required will be provided to State agencies in an administrative records request (Appendix B-2). Responses to the administrative records request will be made via email, following the terms of data-use memorandums of understanding, in Excel, SAS, or another suitable format of the agency's choosing. This data collection activity will involve a total of 15 individuals in SY 2017–2018.

**d. State-Level Cost Data**

For the State cost data collection, State Child Nutrition Agency staff, Medicaid Agency staff, and staff from other State Agencies that play key roles in the DCM-F/RP process will be sent tracking logs (Appendices C-3a and C-3b) to monitor hours spent on start-up and ongoing activities related to DCM-F/RP. Instructions will accompany the data requests. Four times during the school year, the study team will collect the cost logs and conduct clarification calls with agency staff (the cost logs are presented in Appendices C-3a and C3-b and the clarification call

protocol is presented in Appendix C-4) to obtain a more detailed understanding of the costs described and to ensure that no costs have been missed. State Agency staff will be encouraged to keep monthly or weekly logs of DCM-F/RP activities, staff involved in the activities, and estimated hours spent on DCM-F/RP activities. We will ask them to complete logs for July 2017 through June 2018. Logs will be collected quarterly, covering July through September 2017; the second covering October through December 2017; the covering January through March 2018; and the fourth covering April through June 2018. For States new to the demonstration in SY 2017–2018, the first log will also collect data on any costs incurred prior to July 2017. Contingent upon OMB approval, logs will be collected in the month following the end of a given quarter. If OMB approval is not obtained prior to the end of a given quarter, logs will be collected for a quarter retroactively within 8 weeks following OMB approval.

**e. Dissemination**

The findings from the evaluation of the DCM-F/RP demonstration, including results of the qualitative and quantitative analyses, will be presented in a final written report, which FNS will make available on its website. A briefing to present the evaluation findings will also be conducted at FNS headquarters.

**A.3. Use of Improved Information Technology to Reduce Burden**

**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. Because school district, State, and Medicaid staff resources are limited, the following technological collection techniques have been incorporated into the data collection to minimize the burden on these agencies. For the State-level cost data collection, the study will use

a tracking spreadsheet (Appendices C-3a and C-3b); each month, designated staff can easily enter requested data into the spreadsheet. Administrative data will also be provided electronically, as Excel files, or other electronic formats in which the State maintains the data. No information will be collected directly via online or through data systems. On-site observations and interviews will not be computer-assisted.

#### A.4. Efforts to Identify and Avoid 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.**

The information on processes and costs that this study will collect does not exist elsewhere. There is currently no information on the effects of DCM-F/RP. Although direct certification has been conducted with Medicaid under a previous demonstration, the extension of DCM to encompass reduced-price meals and changes to Medicaid under the ACA was not authorized before this demonstration. To avoid duplication, the administrative records data on certification and meal participation that the study will collect is information that States typically collect from school districts for administrative reporting. (Although the data requests are designed to mirror elements the States report on FNS-742 School Food Authority (SFA) Verification Collection Report and FNS-10 Report of School Program Operations Forms (both forms are approved under OMB #0584-0594 Food Programs Reporting System, expiration date 9/30/2019), there are several key differences: (1) the certification data States report on FNS-742 are as of the end of October, which is too early to capture the effects of DCM-F/RP in States that implement the demonstration later in the year; (2) the participation data on FNS-10 is aggregated at the State level, but is needed at the district level for the evaluation; and (3) some data elements needed for the evaluation—such as the breakdown of direct certification numbers by program (SNAP,

Medicaid, etc.)—are not reported to FNS.) The process data to be obtained through the site visits and telephone interviews are qualitative in nature and not available by any other means.

#### A.5. Efforts to Minimize Burden on Small Businesses or Other Entities

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

The study will explore implementation and effects of the demonstration on districts of all sizes. There will be a maximum of 15 small school districts in the study, with enrollments of fewer than 1,000 students. These districts will participate in the same types of data collection activities as larger school districts. We estimate that half of the vendors providing services to the State agencies will be small businesses. In total, 98 respondents (50%) are estimated to be small entities. To minimize burden on all districts and vendors, districts and vendors will not be asked to provide administrative or cost data. Districts and vendors will only be asked to participate in qualitative data collection.

#### A.6. Consequences of Less Frequent Data 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.**

The data collection for the proposed study will be conducted quarterly for cost logs and a single time for all other data collection instruments, though individual respondents are likely to answer more than once during the study. The planned data collection described in this submission is necessary for FNS to understand and evaluate the effects of DCM-F/RP in determining eligibility for F/RP school meals. If this study is not conducted, FNS will lack the means to accurately assess the effect of DCM-F/RP on students' access to F/RP school meals, as well as the costs of DCM-F/RP. FNS is conducting the DCM-F/RP demonstration under the administrative pilot authority in Section 18(c) of the NSLA, and providing data for the evaluation is a requirement of participation in the demonstration for selected States.

A.7. Special Circumstances Requiring Collection of Information in a Manner Inconsistent with Section 1320.5(d)(2) of the Code of Federal Regulations

**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**  
Cost logs (C3a-b) are reported quarterly, but some elements of the data collection require monthly logging. This is because administrative cost and time burdens fluctuate heavily month-to-month because of the school calendar.
- **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**
- **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 other special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

A.8. Federal Register Comments and Efforts to Consult with Persons 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.**

**a. *Federal Register* Notice and Comments**

A notice of the proposed information collection and an invitation for public comment was published in the *Federal Register*, February 24, 2017, volume 82, number 36, pages 11526-11530. The public comment period ended on April 25, 2017. Three public comments were received and are included in Appendix F, along with the response to these comments.

Public comments focused on respondent burden. FNS has taken steps to limit burden by utilizing pre-existing data sources whenever possible and ensuring all notifications sent to SFAs regarding their participation in the evaluation of the DCM-F/RP demonstrations are as clear and concise as possible. There is no burden on households in this information collection.

**b. Consultations Outside of the Agency**

FNS consulted with its Regional Offices and State Agencies participating in the demonstration about this data collection. Regional Offices are in constant contact with State Agencies, which provide feedback on FNS processes and procedures that may impact them. State Agencies summarize feedback from lower-level entities, such as schools and districts. FNS has monthly update calls with representatives from the State Child Nutrition and Medicaid Agencies for demonstration States in which data collection is regularly discussed.

The following representatives from State Child Nutrition agencies participated in calls during Year 1 of the DCM-F/RP evaluation:

- Jeannine Cook, California ([jcook@cde.ca.gov](mailto:jcook@cde.ca.gov))
- Lisa Church, Florida ([Lisa.Church@FreshFromFlorida.com](mailto:Lisa.Church@FreshFromFlorida.com))
- Robert Leshin, Massachusetts ([rleshin@doe.mass.edu](mailto:rleshin@doe.mass.edu))
- Sharon Davis, Nebraska ([Sharon.L.Davis@Nebraska.gov](mailto:Sharon.L.Davis@Nebraska.gov))
- Kimberly Loveland, Utah ([Kimberly.Loveland@schools.utah.gov](mailto:Kimberly.Loveland@schools.utah.gov))
- Lynne A. Fellin, Virginia ([lynne.fellin@doe.virginia.gov](mailto:lynne.fellin@doe.virginia.gov))

- Keri Kennedy, West Virginia ([keri.kennedy@k12.wv.us](mailto:keri.kennedy@k12.wv.us))

The following representatives from State Medicaid agencies participated in calls during Year 1 of the DCM-F/RP evaluation:

- Daniel Nguyen, California ([Daniel.Nguyen@dhcs.ca.gov](mailto:Daniel.Nguyen@dhcs.ca.gov))
- Suzanne Poirier, Florida ([Suzanne.Poirier@myflfamilies.com](mailto:Suzanne.Poirier@myflfamilies.com))
- William Martinez, Florida ([William.Martinez@myflfamilies.com](mailto:William.Martinez@myflfamilies.com))
- Heather Rossi, Massachusetts ([heather.rossi@state.ma.us](mailto:heather.rossi@state.ma.us))
- Catherine Gekas Steeby, Nebraska ([Catherine.gekassteeby@nebraska.gov](mailto:Catherine.gekassteeby@nebraska.gov))
- Dr. Jeff Price, Virginia ([Jeff.Price@dss.virginia.gov](mailto:Jeff.Price@dss.virginia.gov))
- Anita Hayes, West Virginia ([Anita.M.Hayes@wv.gov](mailto:Anita.M.Hayes@wv.gov))
- Kevin Burt, Utah ([kburt@utah.gov](mailto:kburt@utah.gov))

Year 2 calls will also include representatives from State child nutrition and State Medicaid agencies from the Cohort 2 States.

Jessica Stephens from the Centers for Medicare and Medicaid Services ([Jessica.Stephens@cms.hhs.gov](mailto:Jessica.Stephens@cms.hhs.gov)) worked together with FNS on implementation of the demonstration and presented on the kickoff webinar for Year 2. FNS also consulted with Doug Kilburg of the National Agricultural Statistics Service ([Douglas.Kilburg@nass.usda.gov](mailto:Douglas.Kilburg@nass.usda.gov)) on information collection methods (Appendix G).

#### A.9. Payments to Respondents

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

No Federal funds will be made available to States or school districts for the purpose of participating in this demonstration.



#### A.10. Assurance of Confidentiality

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

The Department complies with the Privacy Act of 1974 (5 USC §552a). Participants in this study will be subject to assurances and safeguards as provided by the Privacy Act of 1974, which requires the safeguarding of individuals against invasion of privacy. A system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports, published in the Federal Register on April 25, 1991, Volume 56, page 19078, discusses the terms of protections that will be provided to respondents.

All employees at Mathematica and Insight sign a confidentiality pledge emphasizing the importance of confidentiality and describing their obligation to preserve it (Appendix D). Sensitive data will be stored (segregated) in a designated encrypted project-specific folder on the Mathematica network to which access is restricted through the use of access control lists. Access to these data, and to identifying information on interview respondents, will be limited to those who have direct responsibility for collecting or analyzing the data and for providing and maintaining sample information. At the conclusion of the research, this identifying information will be destroyed. Data stored in the designated restricted folder is easily identifiable to authorized staff for data destruction purposes. Any paper or encrypted removable media containing confidential data will be properly labeled and stored securely in locked files and cabinets in Mathematica offices.

#### A.11. 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.**

As a part of the cost data collection, salary information will be collected because it is necessary to compute costs. Although this may be considered private information, we will only need job titles, first names, or initials to be linked to the salaries; full names of individuals will not be required. Salary information, along with staff time, is necessary to fully understand the cost to State agencies and SFAs in implementing the demonstrations.

All information collected for the evaluation will be used for research purposes only. Data will be collected only in aggregate form so that individual students will not be identified. All employees at Mathematica and Insight sign a confidentiality pledge emphasizing the importance of confidentiality and describing their obligation to preserve it (Appendix D). Access to identifying information on interview respondents will be limited to those who have direct responsibility for collecting or analyzing the data and for providing and maintaining sample information. At the conclusion of the research, this identifying information will be destroyed.

The site visit and follow-up telephone interview questions about DCM-F/RP processes (Appendices A-3a through A-3c and A-6a through A-6c) conducted by State, school district, and vendor staff will not be sensitive in nature. Access to identifying information on interview respondents will be limited to those who have direct responsibility for collecting or analyzing the data and for providing and maintaining sample information. At the conclusion of the research, this identifying information will be destroyed.

#### A.12. Estimates of Respondent Burden

**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.**

**A.12.a. Respondent groups include:**

(1) State-level administrators, including State Child Nutrition Agency staff who administer the NSLP and SBP, State Medicaid Agency staff, and staff from other State Agencies that play key roles in the DCM-F/RP process, (2) school district staff, and (3) vendors of State Child Nutrition and Medicaid Agencies that play key roles in the DCM-F/RP process.

The total estimated respondents is 203 individuals. This includes (1) 93 State administrators (45 State Child Nutrition Agency staff members, 45 State Medicaid Agency staff members, and 3 staff members from other State Agencies), (2) 102 district staff members, (3) 4 staff members from State Agency vendors, and (4) 4 non-respondents. Many of these respondents are included in more than one data collection activity.

The State and district on-site interview (Appendices A-3a through A-3c) burden estimate is 1.00 hour (60 minutes) for each respondent, and the on-site observation burden estimate is 0.5 hours (30 minutes) (Appendix A-4). The accompanying site visit letter (Appendix A-1) burden estimate is 0.083 hours (5 minutes), the site visit scheduling call (Appendix A-2) burden estimate is 0.5 hours (30 minutes), and the site visit preparation (Appendices A-2a through A-2c) burden estimate is 0.25 hours (15 minutes). The vendor interview (Appendices A-3a and A-3b) burden estimate is 1.00 hour (60 minutes), whether conducted on site or by telephone; the advance email sent to those interviewed by telephone (Appendix A-2d) burden estimate is 0.033 hours (2 minutes).<sup>2</sup> The State and district follow-up telephone interview (Appendices A-6a through A-6c) burden estimates are 1.00 hour (60 minutes) for each interview, plus 0.03 hours (2 minutes) for a scheduling email (Appendix A-5). The burden for each administrative records request (Appendix B-2) is 12 hours (720 minutes), with an additional 0.033 hours (2 minutes) to review the cover email (Appendix B-1). The burden for each State cost data collection tracking log (Appendices

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<sup>2</sup> We assume that half of the vendor interviews will be conducted during the site visit and half by telephone.

C-3a and C-3b) is 3 hours (180 minutes), with 0.033 hours (2 minutes) for an introductory email (Appendix C-1) and 0.333 hours (20 minutes) to complete a clarification call (Appendix C-4).

For all persons who decline to participate in the follow-up telephone interview (Appendices A-6a through A-6c) or State cost data collection, the burden estimate is 0.167 hours (10 minutes).

A total of 1,174 burden hours (including 1,173 hours for respondents and 1 hour for non-respondents) are estimated for this study. The estimated burden for this information collection including the number of respondents, frequency of response, average time to respond, and annual hour burden are provided in Appendix E. The estimates are based on experience with comparable instruments on similar studies and the early results of the pre-test and will be adjusted, if necessary, based on final pre-test results.

Pre-testing burden has been approved under OMB # 0584-0606 FNS Generic Clearance for Pre-Testing, Pilot, and Field Test Studies for the pre-testing of this data collection instruments. OMB approved the request for 404 burden hours and 345 responses on December 19, 2016.

#### **A.12.b. Estimates of Total Annualized Cost to Respondents**

The total annualized cost to respondents for this study is estimated to be \$49,606.05. For State government respondents, the North American Industry Classification System (NAICS) 999200: State Government (SOC Code 11-000) mean wage of \$42.33 per hour was used in computing the cost of respondent burden. For local government respondents, the NAICS 999300: Local Government (SOC Code 11-000) mean wage of \$41.86 per hour was used. For Business respondents, the SOC Code 15-0000 (Computer and Mathematical Occupations) mean wage of \$42.25 per hour was used in computing the cost of respondent burden. The estimated costs for each instrument are included in Appendix E.

#### **A.13. Estimates of Other Annual Costs to Respondents**

**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 costs or ongoing operation and maintenance costs associated with this information collection.

#### A.14. Estimates of Annualized Government Costs

**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 annual cost to the Federal government is \$784,632.43. The total cost of this study includes a 36-month, firm fixed-price contract for \$2,254,700 (which represents the contractor's costs for labor, other direct costs, and indirect costs. The annual cost of the contract is \$751,566.66. The cost of the FNS employee, Social Science Research Analyst/Project Officer, involved in project oversight with the study is estimated at GS-13, step 1 at \$45.42 per hour for an estimated 728 hours per year, or \$33,065.76 annually. Federal employee pay rates are based on the Office of Personnel Management for 2017 for the Washington, DC locality.

#### A.15. Changes in Hour Burden

**Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a new collection of information. This information collection is estimated to add 1,174 burden hours and 1,105 responses to OMB's inventory as a program change.

#### A.16. Time Schedule, Publication, and Analysis Plans

**For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

The findings from the evaluation of the DCM-F/RP demonstration, including results of the qualitative and quantitative analyses, will be presented in a final written report to FNS. The report will present findings of the study in clear, nontechnical language that makes them understandable by a broad audience. The report is expected to be made available to the public in

the Fall of 2019. Table A.16.1 presents the schedule for data collection and for delivering these products to FNS.

Table A.16.1. Project Schedule

Task	Data Collection Period or Report Delivery Date
Data collection	Spring 2017-2018, following OMB approval
On-site interviews and observations	Following OMB approval, on a rolling basis after DCM-F/RP first conducted in the state
State-level cost data	Within one month of OMB approval if before October 2017 or after; January 2018, April 2018, and July 2018
Administrative data on certification and participation	<ul style="list-style-type: none"> <li>• Baseline data: Beginning one week after OMB approval</li> <li>• SY 2017–2018 certification data: after DCM-F/RP first conducted in the state and OMB approval</li> <li>• SY 2017–2018 participation data: from after DCM-F/RP first conducted in the state through summer 2018 and OMB approval</li> </ul>
Site visit follow-up telephone interviews	Following on-site interviews and observations
Analysis and reporting	
Draft analytic tables	Winter/spring 2019
Draft report	Summer 2019
Final report	Fall 2019

#### A.17. Display of Expiration Date for OMB Approval

**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 forms will display the expiration date for OMB approval.

#### A.18. Exceptions to Certification Statement

**Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”**

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.