**United States**

**Department of**

**Agriculture**

Food and

Nutrition

Service

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**April 3, 2019**

TO: OMB Desk Officer

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 Christina Sandberg, FNS Information Collection Officer C.S.

 Planning and Regulatory Affairs

 Food and Nutrition Service (FNS)

FROM: Conor McGovern, Social Science Research Analyst

 Special Nutrition Evaluation Branch

 Food and Nutrition Service (FNS)

SUBJECT: Justification for Non Material/Non-Substantive Update to OMB Control No: 0584-0630 Evaluation of the Direct Certification with Medicaid for Free and Reduced-Price (DCM-F/RP) Meals Demonstration to Add Additional Burden to Existing Instruments

Direct certification has improved access to free school meals while easing the burden on families and district staff by reducing the use of household applications and decreasing the number of students subject to verification for school meal benefit eligibility. Direct certification also improves program integrity because it is less error-prone than certification by application.

Recently, FNS has sought ways to further expand direct certification, including experimenting with allowing direct certification based on data from means-tested programs that do not confer categorical eligibility. Prior Direct Certification with Medicaid (DCM) demonstrations have authorized selected States and districts to use income information from Medicaid files to determine students’ eligibility based on their household income and directly certify those students found to be eligible for free meals. The Direct Certification with Medicaid for Free and Reduced-Price Meals (DCM-F/RP) demonstration expands the use of direct certification using income information from Medicaid files to include eligibility for reduced-price meals.

The continuing evaluation of the DCM-F/RP demonstration will investigate further outcomes of using Medicaid data to directly certify students under a ‘steady state’ environment, as the previous study years included time spent during start-up and troubleshooting of the direct certification and data matching process. SY 2018-19 is the first time when all demonstration States will have conducted matches from the first day of the school year. The study will continue to gather data from State Agency administrative records on certification for school meal benefits and participation in the school meal programs. Relevant data will be collected for one additional school year (SY) 2018-2019. Because site visits are no longer required, additional burden hours are requested only for collection of administrative data and cost logs in order to conduct analysis that looks at changes compared to previous evaluated school years.

The following approved instruments will be used:

* Appendix B-1: Administrative Records Request Email
* Appendix B-2: Administrative Records Request
* Appendix C-1: State Cost Data Collection Email
* Appendices C-2, C-3a, and C-3b: State Cost Data Collection Tracking Log
* Appendix C-4: State Cost Data Clarification Call

Appendix B-1 and B-2 will be collected from 15 State Child Nutrition Agency Staff. All other instruments will be collected from 15 State Child Nutrition Agency Staff, 15 State Medicaid Agency Staff, and 3 Other State Agency Staff (for States where a third agency is involved in the demonstration).

No additional burden or responses are requested for any other previously approved instrument.

Currently there are 203 respondents, of which 199 are estimated to be responsive. However, in the additional year of data collection that we are requesting, we estimate only 33 of these (State Agency staff) will be contacted. School district staff and vendors will not be contacted and site visit interviews will not be conducted. The currently approved burden for this collection is 1,105 responses and 1,174 burden hours. We are now requesting 1,552 total annual responses, an increase of 447 total annual responses. Those responses will add an additional 792 burden hours, bringing the total to 1,966.

Table 1 shows the additional requested burden, while Table 2 shows the derivation of this additional burden by line item. Please refer to Appendix D-1 for additional details concerning the burden for this collection.

**Table 1. Overall Requested Change to Burden on this Collection**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Approved** | **Additional Requested** | **Revised Estimates** |
| **Respondents** | 203 | 0 | 203 |
| **Burden Hours** | 1,174 | 792 | 1,966 |
| **Responses** | 1,105 | 447 | 1,552 |

**Table 2. Detailed Breakdown of Additional Burden Requested**

|  |  |  | Responsive | Non-Response |  |
| --- | --- | --- | --- | --- | --- |
| Respondent Type | Instrumenta | **Sample Size (Individuals)** | **Number of Respondents** | **Freq. of Response (annual)** | **Total Annual Response** | **Avg. Hours per Response** | **Total Annual Burden****(Hours)** | **Number of Respondents** | **Freq. of Response (annual)** | **Total Annual Response** | **Avg. Hours per Response** | **Total Annual Burden****Hours)** | **Total Burden Hours** |
| State Government – State Child Nutrition Agency Staff | Administrative Records Request Email (Appendix B-1) | 15 | 15 | 2 | 30 | 0.033 | 1 | 0 | 0 | 0 | 0 | 0 | 1 |
| Administrative Records Request (Appendix B-2) | 15 | 15 | 2 | 30 | 12 | 360 | 0 | 0 | 0 | 0 | 0 | 360 |
| State Cost Data Collection Email (Appendix C-1) | 15 | 15 | 4 | 60 | 0.033 | 2 | 0 | 0 | 0 | 0 | 0 | 2 |
| State Cost Data Collection Tracking Log (Appendices C-2, C-3a) | 15 | 15 | 4 | 60 | 3 | 180 | 0 | 0 | 0 | 0 | 0 | 180 |
| State Cost Data Collection Clarification Call (Appendix C-4) | 15 | 15 | 4 | 60 | 0.333 | 20 | 0 | 0 | 0 | 0 | 0 | 20 |
| (State Government)State Medicaid Agency Staff | State Cost Data Collection Email (Appendix C-1) | 15 | 14 | 4 | 56 | 0.033 | 1.867 | 1 | 1 | 1 | 0.033 | 0.033 | 1.9 |
| State Cost Data Collection Tracking Log (Appendices C-2, C-3b) | 15 | 14 | 4 | 56 | 3 | 168 | 1 | 1 | 1 | 0.167 | 0.167 | 168.167 |
| State Cost Data Collection Clarification Call (Appendix C-4) | 15 | 14 | 4 | 56 | 0.333 | 18.667 | 1 | 1 | 1 | 0.25 | 0.25 | 18.917 |
| (State Government)Other State Agency Staff | State Cost Data Collection Email (Appendix C-1) | 3 | 3 | 4 | 12 | 0.033 | 0.400 | 0 | 0 | 0 | 0 | 0 | 0.400 |
| State Cost Data Collection Tracking Log (Appendices C-2, C-3b) | 3 | 3 | 4 | 12 | 3 | 36 | 0 | 0 | 0 | 0 | 0 | 36 |
| State Cost Data Collection Clarification Call (Appendix C-4) | 3 | 3 | 4 | 12 | 0.333 | 4 | 0 | 0 | 0 | 0 | 0 | 4 |
| **Grand Total** |  | **33** | **32** | **13.875** | **444** | **1.784** | **791.9** | **1** | **3.000** | **3** | **0.150** | **0.450** | **792.4** |

**Appendices:**

Appendix B-1: Administrative Records Request Email

Appendix B-2: Administrative Records Request

Appendix C-1: State Cost Data Collection Email

Appendix C-2: Instructions for State Cost Data Tracking Logs

Appendix C-3a: State Cost Data Tracking Logs

Appendix C-3b: Medicaid State Cost Data Tracking Logs

Appendix C-4: State Cost Data Clarification Call

Appendix D-1: DCM-FRP Burden Table 2019