



April 3, 2019

United  
ates  
Department  
Agriculture

Food and  
Nutrition  
Service

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TO: OMB Desk Officer  
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THROUGH: Ruth Brown, Department Clearance Officer  
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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**

	<b>Approved</b>	<b>Additional Requested</b>	<b>Revised Estimates</b>
<b>Respondents</b>	203	0	203
<b>Burden Hours</b>	1,174	792	1,966
<b>Responses</b>	1,105	447	1,552

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

Respondent Type	Instrument*	Sample Size (Individuals)	Responsive					Non-Response					Total Burden Hours
			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)	
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
<b>Grand Total</b>		<b>33</b>	<b>32</b>	<b>13.875</b>	<b>444</b>	<b>1.784</b>	<b>791.9</b>	<b>1</b>	<b>3.000</b>	<b>3</b>	<b>0.150</b>	<b>0.450</b>	<b>792.4</b>

**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