

MEMORANDUM

TO: Jordan Cohen, OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)

THROUGH: Jamia Franklin, FNS Information Collection Officer
Office of Planning and Regulatory Affairs
Food and Nutrition Service (FNS)

Ruth Brown, USDA Departmental Clearance Officer
Information Resource Management Center
Office of the Chief Information Officer

FROM: Amy Rosenthal, PhD, Social Science Research Analyst
Office of Policy Support, Child Nutrition Evaluation Branch
Food and Nutrition Service

SUBJECT: Justification for Non-Substantive Change to OMB Control No: 0584-0530
Fourth Access, Participation, Eligibility, and Certification Study (APEC IV)

This is a non-substantive change request memo for the Fourth Access, Participation, Eligibility, and Certification Study (APEC IV).

With OMB's approval, the researchers would like to make minor changes to the recruitment process. The OMB-approved protocol is to: 1) send an initial letter to each household, 2) follow up with a recruitment phone call to schedule an appointment, 3) send another letter to confirm the appointment and provide a worksheet for use during the interview, and 4) conduct the interview by Zoom (with or without video) at the scheduled time. During the interview, the interviewer will ask the respondent to show requested income documents using the video function. If the respondent wants to provide those documents later, the interviewer will follow up with directions on how to redact personal information and send images to the study team by text or email.

FNS wants to adjust the protocol to offer respondents the opportunity to complete the interview over the phone during the recruitment call (Step 2). (The respondent will still have the opportunity to schedule a future appointment.) The interviewer will facilitate the process by: a) sending the income worksheet with the initial letter (in Step 1) rather than with an appointment confirmation (in Step 3) and b) walking the respondent through the directions to redact and send their income information by text or email. This adjustment would entail the following changes to the protocol/materials:

- completing some of the interviews by telephone instead of by Zoom;

- sending the income worksheet with the initial mailing and adjusting the accompanying letter to reflect the inclusion of the worksheet (see Appendices C22a and C22b);
- slightly adjusting the protocol/wording of the outreach phone call (see Appendixes C23a and C23b; and
- slightly adjusting the wording of the interview to allow for the option to walk-through the redaction process (see Appendices B5a and B5b).

We are not requesting a change in the burden estimates resulting from these revisions to our approach. Burden may in fact decrease if we do not need to send the planned appointment confirmation letter (Step 3) to the respondents who complete the survey during the recruitment call.)

FNS would appreciate OMB's approval of this request.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.

Attachments

Appendix C22a. Household Survey Recruitment Letter (English)
Appendix C22b. Household Survey Recruitment Letter (Spanish)
Appendix C23a. Household Survey Recruitment Guide (English)
Appendix C23b. Household Survey Recruitment Guide (Spanish)
Appendix B5a. Household Survey (English)
Appendix B5b. Household Survey (Spanish)