



March 2022

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
Planning and Regulatory Affairs
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FROM: Chan Chanhatsilpa, Social Science Research Analyst
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Office of Policy Support
Food and Nutrition Service (FNS)

SUBJECT: Justification for Non-Substantive Change to OMB Control No: 0584-0524
Evaluation of FY 2019 Summer Electronic Benefit Transfer (EBT)
Demonstrations to add one grantee and remove the 2023 data collection
round. No changes to protocols or burden.

FNS is requesting a non-substantive change to the previously approved collection Evaluation of FY 2019 Summer Electronic Benefit Transfer (EBT) Demonstrations (SEBT-X) under the Generic Clearance to Conduct Formative Research or Development of Nutrition Education and Promotion Materials and Related Tools and Grants for FNS Population Groups (OMB Control No. 0584-0524, exp. 12/31/2022).

The SEBT-X Process Study aims to 1) document grantee implementation processes, challenges, and successes and 2) describe participant and retailer experiences with Summer EBT over a three-year period. Results from this evaluation will help FNS understand how Summer EBT projects can be implemented in new and varying settings.

To obtain information from grantees, retailers, School Food Authorities (SFAs) and participants while the project is active, FNS aims to conduct annual in-person or virtual primary data collection (interviews and focus groups) during the summer months (July and August). To achieve this, the study team must begin respondent recruitment in late spring/early summer 2022 to recruit active parents/caregivers of children for focus group participation. Conducting data collection while the project is active is essential for the success of the evaluation.

FNS awarded Summer EBT grants to three ITOs for the summer of 2022: Cherokee Nation, Chickasaw Nation, and the InterTribal Council of Arizona (ITCA). This change notice adds data collection for the summer of 2022 for Chickasaw Nation. Cherokee Nation and ITCA are already included in the approved evaluation sample. This change request is to simply add Chickasaw Nation to the evaluation sample for 2022 and remove Cherokee Nation's Year 3 data collection. Table 1 summarizes the revised evaluation sample members:

Table 1. Requested Change to Evaluation Sample Grantees

Data Collection Year	Grantees Included	Grant Cycle Year
2021	Cherokee Nation	Year 1
	ITCA	Year 2
	Chickasaw Nation	Year 3
2022	Cherokee Nation	Year 2
	ITCA	Year 3
	ADD: Chickasaw Nation	One year grant
2023	REMOVE: Cherokee Nation	Year 3

No changes are proposed to the data collection protocols or instruments. No changes are proposed to the level of burden. The respondent groups (Grantees, SFAs, Retailers, and Caregivers of Participant Children) will remain the same as those in the original submission for the OMB clearance.

The burden remains the same as the original OMB submission because the third year of data collection for the Cherokee Nation grantee is removed. The Chickasaw Nation data collection for Summer 2022 replaces the 2023 data collection for Cherokee Nation. As such, the respondent groups remain as follows:

- The Grantee respondents' burden is 4.5 burden hours.
- The SFA respondents' burden is six burden hours.
- The Retailer respondents' burden is 7.5 burden hours.
- The Caregivers of Participant Children respondents' burden is 120 burden hours.

The total number of respondents, burden hours, and responses are summarized in Table 2 below:

Table 2. Overall Requested Change to Annualized Burden on this Collection

	Approved	Additional Requested	Revised Estimates
Respondents	524	0	524
Burden Hours	248.17	0	248.17
Responses	1,448	0	1448

Once OMB approves the change, FNS intends to recruit the respondents within the groups mentioned and proceed with data collection.

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.