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Office of Information and Regulatory Affairs
Office of Management and Budget

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

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SUBJECT: Justification for Non-Substantive Change to OMB Control No: 0584-0524
Evaluation of FY 2019 Summer Electronic Benefit Transfer (EBT)
Demonstrations to add non-participant interviews and remove one focus
group data collection per grantee site.
Interview protocol presented in Attachment F.4.
Overall level of burden remains the same for the Caregivers Respondent
group.

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.

FNS awarded Summer EBT grants to three ITOs for the summer of 2022: Cherokee Nation, Chickasaw Nation, and the InterTribal Council of Arizona (ITCA). The data collection for the summer of 2022 included: Chickasaw Nation, Cherokee Nation and ITCA in the approved evaluation sample. Table 1 summarizes the evaluation sample members:

Table 1. 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
	Chickasaw Nation	One year grant

FNS conducts annual in-person or virtual primary data collection (interviews and focus groups) during the summer months (July and August). While interviewing grantee staff and active parents/caregivers of children for focus group participation, it became apparent an interview demographic was missing—non-participants. Non-participants, particularly those that completed a free and reduced-price lunch application and/or a Summer EBT application, have a perspective about their choice to not participate in Summer EBT that may help FNS with future outreach and increased Summer EBT participation rates. This change request will add interviews with non-participants to the information collection.

The data collection protocol to conduct the interview with non-participants is included in Attachment 1. FNS does not anticipate changes to the level of burden as the non-participant interviews will replace one focus group in each of the three sites. The breakdown of non-participant interviews to replace one focus group in each grantee site is highlighted in Table 2:

Table 2. Replacing on focus group in each site with non-participant interviews

Data Collection Year	Grantees Included	Original Number of Participants in Focus Groups	Revised Number of Participants in Focus Groups	Added Non-participant interviews	Change
2022	Cherokee Nation	32	24	8	0
	ITCA	32	24	8	0
	Chickasaw Nation	32	24	8	0

The interviews for non-participants will be based on active versus passive consent model as depicted below:

1. Chickasaw Nation
 - a. 4 non-participants that did not complete application
 - b. 4 non-participants where the benefit card was issued but no redemptions made
2. Cherokee Nation
 - a. 4 non-participants that did not complete application
 - b. 4 non-participants where the benefit card was issued but no redemptions made
3. InterTribal Council of Arizona
 - a. Passive site: 0 non-participants that did not complete application
 - b. 8 non-participants where benefit card was issued but no redemptions made

With the above changes, the respondent group level of burden is 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 changed from 120 to 100 burden hours.
- The Caregivers of Non-participant Children respondents' burden is changed from 0 to 20 burden hours.

The total number of respondents, burden hours, and responses are summarized in Table 3 below:

Table 3. 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 three grantee non-participant groups mentioned and proceed with data collection. Conducting data collection by 30 November 2022 is essential for the success of the evaluation.

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.

Attachment F.4 attached: Summer EBT_2022 Non-participant Interview Protocol