

Supporting Statement Part A

OMB No. 0584-[NEW]

Food Security Status and Well-Being of Nutrition Assistance Program (NAP) Participants in Puerto Rico

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Part A. Justification

A.1. Circumstances That Make Data Collection Necessary

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Reference the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This is a new Information Collection Request (ICR). The Nutrition Assistance Program (NAP) is one of the key policy tools in the Puerto Rico food system for addressing food security. Implemented in 1982 as a replacement for the Supplemental Nutrition Assistance Program (SNAP), NAP is administered by the Administración de Desarrollo Socioeconómico de la Familia (ADSEF) of Puerto Rico through 10 regional offices.¹ Following Hurricane Maria, Congress appropriated additional disaster relief funds, provided by section 309 of Public Law 115-72, which were distributed through NAP to program participants in Puerto Rico. Under section 105 of Public Law 116-20 (see Appendix A), funds were appropriated for the Secretary of Agriculture to conduct an independent study of the impact of these additional benefits on the food security, health status, and well-being of NAP participants compared with low-income residents in Puerto Rico without such benefits. A conventional impact assessment, however, requires baseline data, and currently there are no official baseline estimates of food security in Puerto Rico. The current study will address this gap by conducting a representative sample survey of households in Puerto Rico to estimate household food security, health status, and well-being among the territory's population. The data will support comparisons of NAP participants and low-income nonparticipants and provide a baseline for future impact assessments.

Puerto Rico is vulnerable to food insecurity because of a decline in local agricultural production, increased demand for food imports, and natural disasters that disrupt food transport.²

Residents of Puerto Rico also contend with greater levels of material hardship than mainland U.S. residents. According to U.S. Census Bureau population estimates for July 1, 2019, the

¹ Administración de Desarrollo Socioeconómico de la Familia. (n.d.). *El pan esta para ti*. <https://servicios.adsef.pr.gov/>

² Carro-Figueroa, V. (2002). Agricultural decline and food import dependency in Puerto Rico: A historical perspective on the outcomes of postwar farm and food policies. *Caribbean Studies*, 30(2), 77-107.

median household income in 2019 dollars in Puerto Rico was \$20,329 (U.S. national estimate was \$62,843), and 43.5 percent of persons were in poverty (10.5 percent in the United States).^{3,4} The U.S. Department of Agriculture (USDA) monitors food security annually in the United States with the Current Population Survey Food Security Supplement (CPS-FSS); these data are used to establish the effectiveness of nutrition assistance programs. Although the CPS-FSS also reports food security at the State level, it is not administered in Puerto Rico.

This ICR includes three data collection components designed to meet the requirements of the study: (1) a survey of a representative sample of households in Puerto Rico; (2) in-depth interviews with survey participants; and (3) data collected from selected public agencies, private businesses, academia, advocacy organizations, and human service providers to develop a concept map and policy recommendations to improve food security in Puerto Rico. Together, these data collection components will provide a comprehensive account of the impact of NAP in the context of future disasters and identify linkages among (1) NAP and participating households' food security status; (2) the vulnerabilities of NAP to systemic shocks; (3) and the interdependency of nutritional programs and their participants within a broader food and nutrition system.

A.2.Purpose and Use of the Information

Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The primary purpose of this data collection is to measure food security, health status, and well-being of Puerto Rico residents and understand the social and systemic context of these characteristics. Appendix B provides specific research objectives of this study as defined by the Food and Nutrition Service (FNS). To meet these study objectives, FNS will employ a mixed-methods approach with three data collection components:

³ U.S. Census Bureau. (n.d.). *Quick facts: Puerto Rico*. <https://www.census.gov/quickfacts/PR>

⁴ U.S. Census Bureau. (n.d.). *Quick facts: United States*. <https://www.census.gov/quickfacts/US>

1. Household survey to measure and describe food security status among Puerto Rico residents and multiple representative subsamples; for each subsample, the survey will assess elements of health and well-being associated with household food security status in Puerto Rico (see Appendix C.1, C.2, D.1, and D.2)
2. In-depth interviews with NAP participants and low-income nonparticipants to gain a deeper understanding of how households manage their food needs and factors that affect food security status, particularly following natural disasters (see Appendix E.1 and E.2)
3. Development of a concept map of Puerto Rico's food system to identify policies that influence the delivery and effectiveness of NAP and gaps in knowledge of how NAP protects against low food security, particularly when natural disasters strike (see Appendix F.1-F.10)

The household survey will use a dual-frame approach to identify a representative sample and collect data on food security and well-being among Puerto Rico's population. To build the household sample frames, the study team will use an administrative list of NAP participants provided by ADSEF, the agency that administers NAP, and an area probability sample using address-based sampling. The key subgroups of interest are NAP participants and low-income nonparticipants; households with children; households with at least one person aged 60 and older; and households with at least one person with a disability. Recruitment for the NAP participant list sample will include up to three survey invitation letters and a reminder postcard (see Appendix G.1-G.3 and G.12-G.14). A one-third subsample of nonrespondents from the NAP participant list sample will also receive a phone call (see Appendix G.6 and G.17). Recruitment for the area probability sample will include one survey invitation letter (see Appendix G.7 and G.18). All individuals will receive a \$5 prepaid cash incentive with the first survey invitation letter. Respondents in either sample may complete the survey in Spanish or English on paper, by phone, or through a web link (www.websiteTBD.com, Appendix D.1 and

D.2). After survey completion, respondents will receive a thank you letter with a \$40 postparticipation incentive via a gift card as a thank you for their participation (see Appendix G.11 and G.22).

The study sample for the in-depth interviews will be drawn from survey respondents who agree to be contacted for an interview. In-depth interviews will be conducted with NAP participants and low-income nonparticipants. The study team will use survey responses to select an approximately equal number of households with and without children and an approximately equal number of households that are food secure, experiencing low food security, or experiencing very low food security. The in person, in-depth interviews will examine the context of food security and the ways in which difficult life experiences, such as natural disasters, and positive experiences, such as community engagement, influence households' ability to cope with adverse life events. Individuals will be recruited for the in-depth interviews via phone (see Appendix I.1 and I.4). Interviews will be conducted in Spanish or English. Interview respondents will receive a \$50 postparticipation incentive via a gift card or a cash app as a thank you (see Appendix H for information on the use of incentives).

To develop the concept map, the study team will engage stakeholders who are knowledgeable about policies that affect food security in Puerto Rico and represent the primary interest groups engaged in food security issues. Stakeholders will include representatives from human service providers, public agencies, emergency/disaster response agencies, advocacy organizations, private businesses, and academia. The study team expects up to six stakeholder groups with up to seven members each. Data collection will involve three stages: (1) a first set of meetings with stakeholders to brainstorm initial policy and research recommendations (see Appendix F.1–F.5), (2) prioritization and sorting of the recommendations (see Appendix F.6), and (3) a second set of meetings with stakeholders to gather qualitative feedback on the prioritized recommendations (see Appendix F.7–F.10). Stakeholders will be offered a \$50 honorarium (paid by check) per online meeting (\$100 total).

Audiences for the three data collection components will include the following:

- ▶ **Puerto Rico Government:** This category will include ADSEF staff and representatives from public agencies such as human services, education, and healthcare. A staff member from ADSEF will participate in a call with the contractor before preparing and sending administrative NAP datafiles for survey sampling (see Appendix J.1-J.3). Of the 18 representatives contacted from public agencies, 14 will participate in the concept-mapping task. This task includes two 90-minute virtual meetings and review of advance meeting materials (see Appendix F.1-F.10, K.1, and K.2).
- ▶ **Business and nonprofits:** This category will include private businesses, such as agribusiness and food retailers; academia, such as nutritionists, economists, and political scientists; advocacy organizations, such as neighborhood associations, civic groups, and the faith community; and human service providers, such as food banks, workforce development organizations, and community action agencies. Of the 36 businesses and nonprofits contacted, 28 will participate in the concept-mapping task. This task includes two 90-minute virtual meetings and review of advance meeting materials (see Appendix F.1-F.10, K.1, and K.2).
- ▶ **Individuals:** This category will include residents of Puerto Rico, including NAP participants and low-income nonparticipants. Of the 12,280 individuals contacted for the 40-minute survey, 3,655 will complete it (see Appendix C.1, C.2, D.1, and D.1). Of the 865 individuals contacted for the in-depth interview, 144 will participate in a 60-minute in-depth interview (see Appendix E.1 and E.2).

FNS will conduct each data collection only once for each component of the study as described above. All collections are voluntary and will not impact participants' ability to retain or obtain benefits. Information from this study will be used to better understand food security in Puerto Rico and factors that contribute to low food security, especially following a natural disaster. The results will also inform efforts to improve NAP as a tool to promote food security. The survey

will provide descriptive statistics that include baseline estimates of household food security and aspects of health and well-being in Puerto Rico. Interviews and concept mapping will provide baseline contextual data on the household and systemic factors that frame food security in everyday life and following a disaster. Data will be analyzed and compiled into a report and briefing for FNS and a manuscript for submission to a peer-reviewed journal. The study team will also create restricted and public use datafiles FNS can use to conduct additional analyses. The data collection activities for this study will be conducted from spring 2023 through fall 2023.

A.3. Use of Information Technology and Burden Reduction

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

- ▶ FNS is committed to compliance with the E-Government Act of 2002. Sample members will have the option of completing the survey online (i.e., web-based) using a mobile phone, tablet, or computer (Appendix D.1 and D.2). Web-based data collection provides methodological advantages that reduce burden on study participants because it is automated, electronic, and uses other technological collection techniques (e.g., skip patterns). We estimate that 15 percent of survey responses will be collected electronically (548 of 3,655 survey responses).
- ▶ For participants with lower literacy levels and others who may benefit from an interviewer-aided data collection experience, a toll-free telephone number will be provided; individuals can call to schedule a time to complete the survey with the assistance of a trained data collector (Appendix G.4, G.5, G.15, and G.16). The benefits of extending the data collection to individuals with lower literacy levels and those with disabilities far outweigh the possibility of systematic responding bias (i.e., social desirability) that can occur in an interviewer-assisted data collection.
- ▶ The in-depth interviews will not employ information technology in the collection of information. Participants will receive a telephone call from a study team member to schedule the time and location for their interview (Appendix I.1, I.2, I.4, and I.5). All data for in-depth interviews will be collected in person by trained and experienced researchers using semi-structured protocols (see Appendix E.1 and E.2). Interviews will be audiorecorded with respondents' permission using digital voice recorders to aid in note-taking. The interviews will take place at locations convenient to the respondents to minimize burden (e.g., respondent's home, local library with a private space).

- ▶ The concept-mapping data collection will use email to contact and recruit stakeholders (Appendix K.1) and use a virtual meeting platform (e.g., Zoom) to convene stakeholders. A virtual meeting platform will reduce costs associated with travel and enable stakeholders in multiple locations to participate in the meetings. Prior to logging on to the virtual meeting platform, stakeholders will be informed that the meeting will be audiorecorded to ensure stakeholder input is accurately captured (Appendix K.2). Research on the use of virtual platforms for expert working groups shows that participants find the format easy to use and less burdensome than in-person meetings.⁵

A.4. Efforts to Identify Duplication and Use of Similar Information

Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

Every effort has been made to avoid duplication. FNS has determined there is no similar prior or ongoing information collection that duplicates the efforts of the proposed data collection. FNS has examined Federal and non-Federal sources of information and found that no other probability-based survey data collection focusing on food security and health has been or is planned to be conducted in Puerto Rico. The U.S. Census Bureau's Current Population Survey, the most important source of information on food security in the United States, is not collected within the Commonwealth of Puerto Rico, and no comparable source of data is available. The collection of in-depth interview data from a subsample of 144 of the proposed survey respondents will build upon the novel survey data collection and provide a unique opportunity to conduct mixed-methods data analyses.

The concept-mapping data collection will gather information from knowledgeable stakeholders on the policies and practices that could be employed to increase food security. The study team has obtained recommendations from FNS and the Technical Working Group and will work with ASDEF and local partners to identify stakeholders with an understanding of food policy, social safety net programs, and the retail food environment in Puerto Rico. The concept-mapping methodology is akin to the Delphi

⁵ Donohoe, H., Stollefson, M., & Tennant, B. (2012). Advantages and limitations of the e-Delphi Technique: Implications for health education researchers. *American Journal of Health Education*, 43(1), 38-46.

Technique of expert elicitation, and as such, the open-ended and iterative format of the data collection will produce findings that are not available from any other data source.⁶

A.5. Impacts on Small Businesses or Other Small Entities

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This information collection has been held to the minimum required for the intended use. FNS estimates that up to 67 percent (36 of 54) of the local stakeholder respondents who will be asked to participate in the concept-mapping data collection are small entities such as grocery stores or community-based organizations. This is 0.29 percent of the total study sample of 12,504. Because some of these businesses partner with ASDEF to implement or operate NAP and others are directly involved in food assistance relief programs, they must be included in the study. The concept-mapping protocol that will be used to collect information from local stakeholders has been designed to impose minimal burden on small entities. Each stakeholder will participate in two 90-minute virtual meetings scheduled at times convenient to all participants.

A.6. Consequences of Collecting the Information Less Frequently

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The data collection for the proposed study will be conducted one time only. Without this data collection, there would be no baseline estimates of food security in Puerto Rico or a way to measure changes in food security among Puerto Rico's population over time. These baseline data in Puerto Rico are critical to monitoring food security, particularly following natural disasters, and determine the effectiveness of nutrition assistance programs.

A.7. Special Circumstances Relating to the Guideline of 5 C.F.R. § 1320.5

Explain any special circumstances that would cause an information collection to be conducted in a manner:

⁶ Johnson, D. B., Quinn, E., Sitaker, M., Ammerman, A., Byker, C., Dean, W., Fleischhacker, S., Kolodinsky, J., Pinard, C., Jilcott-Pitts, S. B., & Sharkey, J. (2014). Developing an agenda for research about policies to improve access to healthy foods in rural communities: A concept mapping study. *BMC Public Health*, 14, 592. <http://www.biomedcentral.com/1471-2458/14/592>

- ▶ **Requiring respondents to report information to the agency more often than quarterly**
- ▶ **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it**
- ▶ **Requiring respondents to submit more than an original and two copies of any document**
- ▶ **Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than 3 years**
- ▶ **In connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study**
- ▶ **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB**
- ▶ **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use**
- ▶ **Requiring respondents to submit proprietary trade secret or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause USDA FNS to conduct this information collection in a manner inconsistent with 5 C.F.R. § 1320.5.

A.8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting form, and on the data elements to be recorded, disclosed, or reported.

Federal Register Notice and Comments

A notice was published in the *Federal Register* July 28, 2021 (Volume 86, Number 142, Pages 40447-40454; see Appendix L). The comment period closed on September 27, 2021. FNS did not receive comments on this proposed information collection.

Consultations Outside the Agency

FNS consulted with eight Technical Working Group (TWG) members who provided input on the study design. Appendix M presents the panel's comments and FNS responses. Their main comments are summarized as follows:

- ▶ The TWG noted that distributing surveys by mail may be challenged at times by common weather events and unreliable mail service. In addition, weather events may make it difficult to deliver surveys in person to sampled households from the area probability frame. The study team expects most of the completed surveys (approximately 75 percent) will come from the area probability frame and plans to use local data collectors who are familiar with the roads and alternate routes to deliver surveys to sampled households. To minimize the impact of weather on data collection, the study team will begin the field period after the typical hurricane season.
- ▶ To maximize response rates, the TWG suggested including a web-based option to complete the survey, which the study team has added. The TWG also noted that mistrust of the government in Puerto Rico and use of sensitive terminology could impact response rates. The study team will get endorsements from trusted local community entities and avoid the use of potentially sensitive phrases such as food insecurity, which carries a stigma among some households.
- ▶ The TWG noted that the study team may have difficulty reaching people with low-literacy, transient households, and working food insecure households. The study team will offer a telephone option to complete survey for individuals with low literacy. In addition, data collectors will meet regularly to discuss recruitment goals and identify gaps to focus subsequent recruitment efforts.

The methodology was also reviewed by a member of the National Agricultural Statistics Service (NASS) (see Appendix N). The study team pretested each data collection instrument with respondents from Puerto Rico. The survey was pretested with 8 respondents (Appendix O, Table 2) and the interview guide, which uses different questions, was pretested with 9 respondents (Appendix O, Table 3).

Table A.8.1. Individuals Consulted Outside the Agency

Name	Organizational Affiliation	Contact Information
Alisha Coleman-Jensen	U.S. Department of Agriculture, Economic Research Service	alisha.coleman-jensen@usda.gov
Amy Samalot Giovannetti	Puerto Rico Food and Nutrition Commission	amy.samalot@salud.pr.gov
Angela Odoms-Young	University of Illinois at Chicago	odmyoung@uic.edu
Ariela Zycherman	U.S. Department of Commerce, National Oceanic and Atmospheric Administration	ariela.zycherman@noaa.gov
Denise Santos	Banco de Alimentos de Puerto Rico	dsantos@bancodealimentopr.org
Joel Gittelsohn	Johns Hopkins Bloomberg School of Public Health	jgittel1@jhu.edu
Uriyoan Colon-Ramos	The George Washington University	uriyoan@gwu.edu
Winna Rivera-Soto	University of Puerto Rico	winna.rivera@upr.edu
Brent Farley	National Agricultural Statistical Service	Brent.farley@usda.gov

A.9. Explanation of Any Payment or Gift to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

It is common practice to provide incentives to increase response rates, gain efficiency in data collection, and reduce nonresponse bias. Based on the empirical evidence summarized in Appendix H, FNS is requesting that all sampled households receive a \$5 prepaid cash incentive with the invitation letter. FNS is also requesting approval to provide a \$40 postparticipation incentive (paid by gift card⁷) to households that complete the survey and a \$50 postparticipation incentive (paid by cash app or gift card) to individuals who participate in an in-depth interview. The incentive can offset any expenses such as cellular smartphone airtime or any internet connectivity charges participants may incur. The team is also requesting a \$50 honorarium (paid by check) per meeting for concept-mapping participants. The honorarium is intended to encourage participation and recognize the participants' unique expertise.

⁷ The study team has not determined what type of gift card will be used. As has been approved for previous FNS studies, the team typically asks a local contact (e.g., Estudios Técnicos) during the planning phase about the most useful type of gift card for respondents in that particular community. For example, in some communities, it might be a local grocery store, whereas in another community, it might be a national chain store. Generic credit card gift cards, such as Visa and MasterCard, include an activation fee above and beyond the value of the card, which means participants would not receive the full benefit of the token of appreciation.

A.10. Assurance of Confidentiality Provided to Respondents

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

In accordance with the Privacy Act of 1974, the study team will protect the privacy of all information collected for the study and use it for research purposes only. The terms and protections provided to respondents are discussed in two system of records notices: (1) FNS-8 USDA FNS Studies and Reports, published in the *Federal Register* April 25, 1991, volume 56, page 19078 (see Appendix P.1); and (2) USDA/FNS-10 Persons Doing Business with the Food and Nutrition Service, published in the *Federal Register* March 31, 2000, volume 65, page 17251 (see Appendix P.2).

The FNS Privacy Officer, Michael Bjorkman, reviewed this information collection request and determined on December 1, 2021, that the data collection meets the requirements of the Privacy Act (see Appendix Q for the Privacy Officer's comments and FNS responses). The study protocol, data collection tools and procedures, informed consent forms, and data handling and security procedures have been reviewed and approved by an independent institutional review board registered with the U.S. Department of Health and Human Services, Office of Human Research Protection (see Appendix R).

As part of the data collection process, participants will be informed that participation is voluntary and will in no way affect their benefits or employment and that there is no penalty if they decide not to respond to the data collection as a whole or to any particular question; nor will any information provided during the data collection be released except as otherwise required by law (for the survey, see Appendix G.1, G.3, G.7, G.12, G.14, and G.18; for interviews, see Appendix E.1 and E.2; and for concept mapping, see Appendix K.2). The study team will assure participants that the information they provide will not be published in a way that identifies them. For reporting of results, data will be presented only in aggregate form without identifying individuals and institutions. A statement to this effect will be included with all requests for data.

FNS's contractor will employ the following safeguards to protect privacy during the study. Survey respondents will have a unique ID number, and the study team will conduct the analysis on datasets that include only respondent ID numbers. A secure file transfer protocol (FTP) site, accessible only to study team staff, will be used to transfer administrative data. Names and phone numbers will be destroyed within 12 months after the end of the study period. All members of the study team with access to the data will be trained on the importance of privacy and data security. All data will be kept in secure locations. Computer datafiles will be protected with passwords, and access will be limited to specific users on the study team. Employees must notify their supervisor, the project director, and the contractor's security officer if secured and private information has been disclosed to an unauthorized person, used in an improper manner, or altered in an improper manner. The Confidentiality Pledge, in which employees of the contractor provide assurances to the safeguards described in this section, is provided in Appendix S.

No identifying information will be attached to any reports or data supplied to USDA or any other researchers. All datafiles provided to FNS will be de-identified, so FNS staff will never handle or see any personally identifiable information. The contractor's systems do not link to any of FNS's data management and analysis systems. The contractor's data processing system was not created for this contract agreement. FNS has no control over the contractor's systems.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The proposed information collection includes questions some respondents might find sensitive. See Appendix Q for comments from the FNS Privacy Officer, Michael Bjorkman, and FNS responses. All respondents will be informed they can decline to answer any question they do not wish to answer and there are no negative consequences for not participating. Sensitive survey questions include household income; participation in NAP and other assistance programs; food security; whether anyone in the

household has a disability; and whether anyone in the household has received treatment or services because of a problem with alcohol, tobacco, or drug use. Information about potentially sensitive topics is important to the descriptive and statistical uses of the study. Household income and disability status are factors used to determine NAP eligibility and therefore necessary for comparisons between NAP participants and low-income, NAP-eligible nonparticipants. Household income and food security are important socioeconomic indicators that have been associated with an individual's health and ability to successfully recover in the aftermath of a natural disaster. Disability status; participation in financial assistance programs; and participation in treatment related to alcohol, tobacco, or drug use are factors associated with household food security status and effective measures to remedy household food insecurity. This study will enable FNS to examine the relationship of these indicators with food security status, food access, and food acquisition patterns.

Sensitive topics that may come up in the in-depth interviews include questions about income and participation in government-sponsored assistance programs, difficult or traumatic life events such as the inability to meet basic needs (e.g., attaining food and secure housing), and experiences related to natural disasters. Participant responses to these questions are necessary to provide a more comprehensive account of the impact of NAP in the context of future disasters and identify linkages among (1) NAP and participating households' food security status; (2) the vulnerabilities of NAP to systemic shocks; (3) and the interdependency of nutritional programs and their participants within a broader food and nutrition system.

A.12. Estimates of Hour Burden, Including Annualized Hourly Costs

Provide estimates of the hour burden of the collection of information. The statement should:

- ▶ **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour-burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

The estimated burden for this information collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden, is shown in the

attached Burden Table (see Appendix T). The time estimate in the burden table includes time for reading data collection materials, such as emails, and responding to the data collection. This new information collection will have 12,504 respondents (19 Puerto Rico Government staff, 36 business and nonprofit stakeholder staff, and 12,449 individuals). Of the 12,504 contacted, 3,744 are estimated to be responsive, and 8,760 are estimated to be nonresponsive. The estimated annual burden is 4,994.3933 hours (4,248.9980 hours for responsive participants and 745.3953 hours for nonresponsive participants). The estimated time of response varies from 0.0167 hours to 40.00 hours depending on respondent group and activity. The estimated number of total annual responses is 63,703, and the estimated number of responses per respondent is 5.09. No respondents will be asked to keep records of data as part of this data collection; therefore, no burden hours have been estimated for recordkeeping or third-party disclosure.

- ▶ **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

The estimated total cost to respondents with fully loaded wages (including 33 percent fringe benefits) is \$67,976.69 over a 5-year period, or \$13,595.34 on an annualized basis.

This total annualized cost is calculated as the sum of the annualized costs by respondent category. For each respondent category, the annualized cost is the product of burden hours (including nonresponse burden) and an assumed wage rate for a corresponding occupation.

The wage rates were estimated based on the most recently available national occupational employment and wage data from the U.S. Department of Labor’s Bureau of Labor Statistics.⁸ The wage rate of individuals is the Federal minimum wage, \$7.25 an hour.⁹ Table A.12.1 provides the wage rates for other affected members of the public.

Table A.12.1. Average Hourly Earnings by Type of Respondent

Type of Respondent	Occupational Category	Average Hourly
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⁸ For wage rates, see DOL BLS. (2021). *May 2020 national occupational employment and wage estimates United States* [Dataset]. https://www.bls.gov/oes/current/oes_nat.htm

⁹ For Federal minimum wage information, see DOL, U.S. Department of Labor, Wage and Hour Division. (2021). *State minimum wage laws*. <https://www.dol.gov/agencies/whd/minimum-wage/state#pr>

		Earnings
Public agencies, such as human services, education, and healthcare	Management occupations (11-0000)	\$60.81
Private businesses, such as agribusiness and food retailers	Life, physical, and social science occupations (19-0000)	\$38.15
Advocacy organizations, such as neighborhood associations, civic groups, and the faith community	Community and social service occupations (21-0000)	\$25.09
Community action agencies	Community and social service occupations (21-0000)	\$25.09

Source: U.S. Department of Labor, U.S. Bureau of Labor Statistics. (2021). Occupational Employment and Wage Statistics: May 2020 Occupation Profiles. https://www.bls.gov/oes/current/oes_stru.htm

A.13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: a) a total capital and startup cost component annualized over its expected useful life, and b) a total operation and maintenance and purchase of services component.

No capital, startup, or ongoing operational and maintenance costs are associated with this information collection.

A.14. Annualized Cost to Federal Government

Provide estimates of annualized cost to the Federal Government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The total cost to the Federal Government is \$5,710,844.94 over a 5-year period, or \$1,142,168.99 on an annualized basis. The annualized cost includes \$1,117,341.80 based on fully loaded wages for the contractor to conduct the study (including the study design, instrument development, data collection, reporting, and presentation of the results), plus \$11,231.85 based on fully loaded wages for the FNS Federal Government staff to conduct project oversight and review. The \$11,231.85 annual cost for Federal Government staff assumes a total of 150 hours per year for a GS-13, step 4 Social Science Research Analyst at \$56.30 per hour for a total of \$8445.00 plus 33 percent for fringe benefits (\$2,786.85). Federal employee pay rates are based on the General Schedule of the Office of Personnel Management for 2022 for the Washington, DC, locality.

A.15. Explanation for Program Changes or Adjustments

Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This submission is a new information collection request as a result of program changes, and will add 4,994.39 total burden hours and 63,703 total annual responses to the OMB information collection inventory.

A.16. Plans for Tabulation and Publication and Project Time Schedule

For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Survey data collection will begin 5 months after OMB approval and run for about 20 weeks. The study team will use standard quantitative methods to analyze survey data. Analyses will be conducted using a statistical software package, such as SAS. Using the weighted survey data, the study team will conduct univariate, bivariate, and regression analyses to address the questions associated with the first three research objectives (see Appendix B).¹⁰ Univariate analysis techniques will describe the overall household characteristics. Bivariate analysis will describe the subgroup household characteristics (i.e., NAP participation status, presence of older individuals in the household, and presence of children in the household). Multivariate regression analysis will examine associations between household characteristics and food security while controlling for other characteristics that may confound the associations.

In-depth interview data collection will begin 4 weeks after survey data collection has started. The study team will create a coding scheme using Grounded Theory for Qualitative Research¹¹ and build a qualitative database using NVivo 12 analytic software. The coding scheme will be composed of key themes (e.g., adaptation strategies for difficult life experiences, NAP participation, family structure) and will be used to train all team members involved in coding and analysis.

¹⁰ The study team will use the delete-one jackknife-replication method to calculate standard errors for all analyses. The team will include the variance stratum and variance unit identifiers on each record in the restricted-use datasets (and in the public-use datasets, if permissible) so that the Taylor Series linearization approach to calculating standard errors can be used.

¹¹ Bryant, A., & Charmaz, K. (Eds.). (2019). *The SAGE handbook of current developments in grounded theory*. SAGE Publications.

Concept-mapping data collection will start after the survey and in-depth interview data collection are in progress. Using GroupWisdom, an online concept-mapping software, the study team will analyze the data collected using Likert scale prioritization, data visualization, and thematic analysis.

Results will be presented in the final study report, which will be made public on the USDA FNS website: <http://www.fns.usda.gov/ops/research-and-analysis>. The report will include two volumes and a separate report of the concept map activities and findings. Volume I will include a summary of the findings, and Volume II will include more detailed statistical tables. Prior to publication, the report will be shared with the Technical Working Group and ADSEF. Results will also be presented in a manuscript for a peer-reviewed journal. Table A.16.1 provides the schedule for data collection, tabulation, and publication.

Table A.16.1. Project Time Schedule

Project Activity	Months After OMB Approval	Estimated Date (Assuming November 2022 OMB Approval)
Data collector training	3 months	February 2023
Survey data collection	5 months	April 2023–August 2023
In-depth interview data collection	6 months	May 2023–August 2023
Concept-mapping data collection	7 months	June 2023–November 2023
Survey data analysis	10 months	September 2023–May 2024
In-depth interview data analysis	10 months	September 2023–March 2024
Concept-mapping analysis	15 months	December 2023–February 2024
Delivery of draft report to FNS	25 months	December 2025
Delivery of final report to FNS	32 months	July 2025
Briefing	31 months	June 2025
Peer-reviewed manuscript	33 months	August 2025

A.17. Reason(s) Display of OMB Expiration Date Is Inappropriate

If seeking approval not to display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

All data collection instruments will display the OMB approval number and expiration date.

A.18. Exceptions to Certification for Paperwork Reduction Act Submissions

Explain each exception to the certification statement identified in Item 19 “Certification for Paperwork Reduction Act.”

There are no exceptions to the certification statement. The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.