



Food and Nutrition Service

TO: Laurel Havas
OMB Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget (OMB)

1320 Braddock

Place Alexandria, VA 22314

THROUGH: Ruth Brown
Department Clearance Officer
United States Department of Agriculture
Office of Chief Information Office (OCIO)

Jamia Franklin
Information Collection Clearance Officer
OPS/Planning and Regulatory Affairs Office
Food and Nutrition Service (FNS)

FROM: Kristen Corey
SNAP Evaluation Branch
OPS/SNAP Research and Analysis Division
Food and Nutrition Service (FNS)

DATE: May 9, 2023

SUBJECT: Justification for change in recruitment process for survey approved for OMB Control No: 0584-0674 "Food Security Status and Well-Being of Nutrition Assistance Program (NAP) Participants in Puerto Rico."

The Food and Nutrition Service (FNS) is requesting a non-substantive change to the study of Food Security Status and Well-Being of Nutrition Assistance Program (NAP) Participants in Puerto Rico, approved under OMB Control No. 0584-0674; expiration date of September 30, 2025. Through this memorandum, we are requesting approval to change the survey recruitment procedures for the area probability sample. Survey staff recruit area probability sample members by canvassing neighborhoods to distribute surveys to selected households.

In the first two weeks of survey administration, the study team reported that survey staff approached 20 locked multifamily buildings and gated communities to distribute surveys to selected households and were denied access by 14 of those. This has the potential to impact the composition of the sample and response rates. As a result, we are proposing to include an introductory letter from the FNS Project Officer that survey staff can show property managers of locked multifamily buildings and gated communities to support the legitimacy of the survey and facilitate access to these locations.

The change results in additional burden to account for the time property managers will spend reading the introductory letter. The change does not involve asking respondents to submit any new or additional information. It also does not involve asking property managers to submit any information. The estimated time to complete the survey is not impacted by this change.

This change would result in the following changes to overall burden:

- *Number of Respondents and Nonrespondents:*
 - Increase of 128 respondents (from 12,504 to 12,632 respondents).
- *Frequency of Response:*
 - Decrease of 0.0415 responses per respondent (from 5.0531 to 5.0946 responses per respondent)
- *Total Annual Responses:*
 - Increase of 128 responses (from 63,703 to 63,831 responses).
- *Hours per Response.*
 - Increase of 0.00001023 hours per response (from 0.078400744 to 0.07841097 hours per response).
- *Total Annual Burden:*
 - Increase of 10.688 burden hours (from 4,994.3933 to 5,005.0813 hours).
- *Total Annualized Cost of Respondent Burden:*
 - Increase of \$520.13 (from \$67,976.69 to \$68,496.81, based on a mean hourly wage for Property, Real Estate, and Community Association Managers for May 2022 of \$36.59¹).

The current total annual responses is 63,703. We are now requesting 63,831 total annual responses, an increase of 128 total annual responses.

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 U.1. Introduction Letter for Property Managers in English
- Appendix U.2. Introduction Letter for Property Managers in Spanish
- Currently approved burden: Appendix T Total Public Burden Hours and Cost_05032022
- Updated burden: Appendix T Total Public Burden Hours and Cost_UPDATED 05042023

¹ <https://www.bls.gov/oes/current/oes119141.htm>