

Memorandum

Date: November 14, 2023

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

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

Ruth Brown, Department Clearance Officer
U.S. Department of Agriculture
Office of the Chief Information Officer (OCIO)

From: Brooke Hardison
Office of Policy Support
Food and Nutrition Service (FNS)

Re: Under Approved Generic OMB Clearance No. 0584-0524 Request for Approval
for Collection for Formative Research for FNS Summer Nutrition Campaign
Concept Testing Survey

The Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) is requesting approval for formative research under approved Generic OMB Clearance No. 0584-0524 Generic Clearance to Conduct Formative Research.

FNS is currently developing a public awareness campaign to increase awareness and understanding of the broader umbrella of summer nutrition programs that support children and families during the summer, including two new strategies – the “grab and go” non-congregate meals/meal delivery to children in rural areas and the “Summer Electronic Benefit Transfer (EBT)” program. The campaign will include explanatory and promotional materials for families and organization representatives who will play a role in building awareness and/or that are site sponsors of the program in their local communities (e.g., schools, libraries, community-based organizations).

To ensure the branding, visual representations, and messaging of the campaign materials are culturally relevant, easy to understand, and motivating to the target audiences, FNS would like to field a campaign concept testing survey with families, inclusive of parents of different races/ethnicities, those residing in various geographies across the U.S. (including rural areas), parents from countries of origin outside of the U.S., tribal communities, and other underserved communities. Also, FNS will field the campaign concept testing survey with representatives

from the organizations that support and serve families to fight summer hunger (stage agencies, tribal communities, schools, site sponsors, etc.).

This request is to acquire clearance to collect voluntary feedback among the parents/guardians and stakeholder audiences to meet the following goal:

- To determine how these audiences currently view three distinct consumer campaign concepts that connect to the new Summer Nutrition program brand and understand which messaging and visual approaches best resonate among and across them.

Feedback collected will be used to guide the selection and refinement of the public awareness campaign concept that will underpin the final campaign materials and to inform/refine the need for changes in dissemination strategies and tactics.

The following information is provided for your review:

1. **Title of the Project:** USDA FNS Summer Nutrition Program Campaign Concept Testing Survey
2. **Control Number:** 0584-0524, Expires 02/28/2026
3. **Public Affected by this Project:**

FNS Summer Nutrition Program parents/guardians and state/tribal/organization representatives, as defined, below:

- **Parents/guardians/guardians of children, 18 years and younger**
 - Inclusive of different races/ethnicities
 - They are a decision-maker for their children's nutrition during summer months
 - They represent a mix of families who participate in other nutrition benefits programs (free/reduced school lunch, SNAP, WIC) or no programs at all but are lower-income levels
 - Represent a mix of rural and urban locations across the U.S.
 - Inclusive of parents with immigrant/mixed status (at least one parent was born outside the U.S.)
- **State, tribal, or local representatives who will be involved in implementing, sponsoring, or promoting the programs**
 - State/tribal agency representatives who will be involved in the day-to-day implementation
 - Organization representatives who will play a role in building awareness and/or that are site sponsors of the program (e.g., schools, libraries, community-based organizations)

See section 7, *Project Purpose, Methodology & Formative Research Design*, for a description of the number of each audience type and key subgroup designations.

This project does not meet the regulatory definition of research as defined under the Department of Health and Human Services Code of Federal Regulations [45 CFR part 46.102(d)(f)]. Given the determination, further IRB review and approval of this project is not required. The research only includes a survey and the information obtained from the research participants cannot readily be ascertained, directly or through identifiers linked to the participants.

4. Number of Respondents:

FNS, along with our contractors, will contact approximately 2,100 parents, guardians, and stakeholders to recruit 350 participants to complete the survey.

Among the 2,100 individuals (2,000 parents/guardians and 100 stakeholders) initially contacted (see Attachment A for survey invitation), we estimate that 1,400 parents/guardians (70%) and 50 (50%) of stakeholders will not participate in any phase of research. We expect 600 parents/guardians (30%) will go on to participate in the screener, and 50 stakeholders (50%) will go on to review the Privacy Statement (no screening necessary since the contacts are from FNS).

We further estimate that among 600 parents/guardians who would respond to a screener, 300 (50%) will not be eligible to complete the survey and 300 (50%) will be eligible to complete the survey. The Privacy Act statement will be presented to the 600 parents/guardians who respond to the screener and 50 stakeholders. The consent form is presented to the 300 parents/guardians eligible to complete the survey and 50 stakeholders (Attachment B includes the Privacy Act Statement, screener, consent form, and survey).

Table 4.1 - Number of Respondents

| Audience | # of Participants | # of Responders | % of Responders | # of non-responders | % of non-responders |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-----------------|-----------------|---------------------|---------------------|
| Invitation¹ | | | | | |
| Parents/Guardians | 2,000 | 600 | 30% | 1,400 | 70% |
| Stakeholders | 100 | 50 | 50% | 50 | 50% |
| Survey² | | | | | |
| Parents/Guardians | 600 | 300 | 50% | 300 | 50% |
| Stakeholders | 50 | 50 | 100% | 0 | 0% |
| Total | 2,750 | 1,000 | | 1,750 | |
| ¹ FNS assumes it will take 2 minutes for respondents to complete. ² NOTE: The survey includes and assumes the following: <ul style="list-style-type: none"> • It will take 2 minutes for respondents to review the Privacy Statement (Attachment B). • It will take 5 minutes for parent/guardian respondents to review and complete the screener (stakeholders do not need to complete screener questions) (Attachment B). • It will take 2 minutes for eligible respondents to review and provide consent (Attachment B). | | | | | |

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| | <ul style="list-style-type: none"> It will take 10 minutes for respondents to complete the survey (Attachment B). |
|--|----------------------------------------------------------------------------------------------------------------------------------|

5. Time Needed Per Response:

| Collection Activity | Time (minutes) | Time (hours) |
|---------------------------------|----------------|--------------|
| Invitation | 2 | 0.033 |
| Privacy Statement | 2 | 0.033 |
| Screeners for Parents/Guardians | 5 | 0.083 |
| Consent | 2 | 0.033 |
| Survey | 10 | 0.167 |
| Total | 21 | .349 |

6. **Total Burden Hours on Public:** 210.55 burden hours and 1,350 responses and 1,750 non-responses. The survey timing included in Table 6.1, below, includes the time for respondents to review the Privacy Statement (2 minutes) and parents/guardians to review and complete the screener (5 minutes). For eligible parents/guardians and stakeholders, Table 6.1 includes the time to review and provide consent (2 minutes) and the time to take the survey (10 minutes).

Table 6.1 Total Burden Hours on Public

| Activity | Attachment | RESPONDENTS | | | | | | NON-RESPONDERS | | | | | TOTAL BURDEN HOURS |
|--------------------------------------------------------|------------|--------------|------------------|------------------------------|-----------------|---------------------------|--------------------------------|---------------------|------------------------------|-----------------|---------------------------|--------------------------------|--------------------|
| | | Sample Size | # of Respondents | Frequency of Data Collection | Total Responses | Time per Response (hours) | Total Estimated Burden (hours) | # of Non-Responders | Frequency of Data Collection | Total Responses | Time per Response (hours) | Total Estimated Burden (hours) | |
| Invitation | | | | | | | | | | | | | |
| Parents/Guardians | A | 2,000 | 600 | 1 | 600 | 0.033 | 19.80 | 1,400 | 1 | 1,400 | 0.033 | 46.20 | |
| Stakeholders | A | 100 | 50 | 1 | 50 | 0.033 | 1.65 | 50 | 1 | 50 | 0.033 | 1.65 | |
| Survey | | | | | | | | | | | | | |
| Privacy Statement and Screener Parents/Guardians | B | 600 | 300 | 1 | 300 | 0.116 | 34.80 | 300 | 1 | 300 | 0.116 | 34.80 | |
| Privacy Statement Stakeholders | B | 50 | 50 | 1 | 50 | 0.033 | 1.65 | 0 | - | - | - | - | |
| Consent Form and Survey for Eligible Parents/Guardians | B | 300 | 300 | 1 | 300 | 0.200 | 60.00 | 0 | - | - | - | - | |
| Consent Form and Survey for Stakeholders | B | 50 | 50 | 1 | 50 | 0.200 | 10.00 | 0 | | | | | |
| TOTALS | | 3,100 | 1,350 | | 1,350 | | 127.90 | 1,750 | | 1,750 | | 82.65 | 210.55 |

7. Project Purpose, Methodology, and Formative Research Design:

Background

Summer hunger impacts too many children when they lose access to nutritious school meals that nearly 30 million children rely on during the school year. The Food and Nutrition Service (FNS) now has two powerful new tools to fight childhood summer hunger.

The Consolidated Appropriations Act, 2023 (P.L. 117-328) authorized a permanent Summer EBT program that will provide a summer benefit to each child eligible for free and reduced-price meals as well as new flexibility in the Summer Food Service Program (SFSP) and National School Lunch Program Seamless Summer Option for rural communities. States now have more options to ensure no child goes hungry during the summer months. Specifically:

- Starting in summer 2023, approved summer meal sponsors are allowed to provide “grab and go” meals or meal delivery to children in rural areas rather than using the traditional program structure which requires on-site, group meals.
- Starting in summer 2024, states, U.S. territories, and some tribal nations can provide a pre-loaded benefit card to low-income households with children to purchase groceries over the summer through a “Summer EBT” program.

Summer EBT and non-congregate summer meals do not replace, but instead will complement the traditional summer meals model where kids eat meals at a site. The challenge, especially for states and territories, is to deploy all the available tools strategically to ensure no child goes hungry in the summer. This will necessitate multiple communication and education strategies beginning in the fall 2023 and continuing through spring/summer 2024.

FNS will implement a national outreach campaign aimed at increasing awareness of summer nutrition options, including summer meal sites, Summer EBT, and non-congregate summer meals. This will include developing supporting materials, with the primary goals of increasing the understanding of the programs across all stakeholder groups, supporting a successful implementation, and increasing participation in these programs for children and families.

Purpose

The purpose of the proposed research is to test campaign concepts with key audience segments to guide the refinement of the consumer campaign materials. We will test three (3) distinct campaign concepts that connect to the new Summer Nutrition program brand.

This survey content—in terms of recruitment criteria and concept testing questions—is built from previous studies we’ve completed for federal and state agencies focusing on underserved communities to inform the creative development of public awareness campaign materials. Most recently, we’ve conducted concept testing surveys with parents who are currently receiving or who are eligible to receive benefits from the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and for individuals receiving Supplemental Nutrition Assistance Program (SNAP) benefits to inform both public awareness and branding campaign materials.

Methodology/Research Design

This research will consist of a 10-minute online survey. The target audience for the survey will be parents/guardians of children 18 years and younger. We will include:

- Parents/guardians/caregivers of children, 18 years and younger (will ensure they are a decision-maker for their children’s nutrition during summer months)
- Mix of participation in nutrition benefits programs (free/reduced school lunch, SNAP, WIC, and those likely eligible based on household income)
- Mix of rural and urban locations across the U.S.
- For immigrant/mixed status – at least one parent born outside the U.S

The survey will include a stratified sample of 300 individuals, including 250 parents/guardians who meet the criteria described above and 50 stakeholders that include organization representatives who will play a role in implementing, building awareness, and/or that are site sponsors of the program (e.g., state/tribal agencies, schools, libraries, community-based organizations).

The 250 parents/guardians are further stratified by race/ethnicity to ensure inclusion of various subgroups to determine if there are any actionable differences related to their opinions about the campaign concepts. It is important the campaign concepts are relevant, easy to understand, and relevant to the various racial/ethnic subgroups. We recommend smaller numbers of American Indian/Alaska Native and Asian/Native Hawaiian/Pacific Islander respondents given our experience in recruiting these smaller subgroups in the overall population of parents.

Table 7.1 Recommended Parent/Guardian Subgroups (n=250)

| | # |
|---------------------------------------------------|----|
| Hispanic/Latino, including immigrant/mixed status | 50 |
| Hispanic/Latino in English | 50 |
| Black | 50 |

| | |
|-------------------------------------------------------|----|
| White | 50 |
| American Indian/Alaska Native | 25 |
| Asian/Asian American/Native Hawaiian/Pacific Islander | 25 |

Also, we will ensure approximately 50 survey respondents are comprised of state, tribal, or local representatives who will be involved in implementing or promoting the summer nutrition programs. FNS will provide the stakeholder contacts for which to invite to participate in the survey. Table 7.2, below, provides the number of respondents we expect for the two stakeholder subgroups.

Table 7.2 Stakeholder Subgroups (n=50)

| | # |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| State/tribal agency representatives who will be involved in the day-to-day implementation | 25 |
| Organization representatives who will play a role in building awareness and/or that are site sponsors of the program (e.g., schools, libraries, community-based organizations) | 25 |

The survey primarily contains closed-end or rating scale question types in a variety of formats but also includes a few open-ended (qualitative) items to provide additional context. Completion of the survey will be 100% voluntary/optional and will not include any personal information. The survey will be hosted on the online survey platform called Qualtrics.

Design/Sampling Procedures

Parents/guardians will be recruited randomly from existing online panels. After participants review the Privacy Statement they will respond to a set of screening questions. If they are eligible for the survey, they will complete the consent form and proceed to the survey questions (Attachment B). In addition to determining the subgroup of each respondent, the screening questions will:

- Confirm criteria for study participation of parents/guardians who are responsible for feeding children in one or more of the summer months, who may be receiving other nutrition benefits programs or are lower income levels.

FNS will provide contacts and contact information for the stakeholder respondents. We will send an email invitation with a link to the survey to provide input on the campaign concepts, since they will potentially be using campaign materials to promote the programs in their communities.

Recruitment and Consent

We anticipate beginning this study within 1 to 2 weeks following final OMB approval. After approval, the survey will be programmed into an online survey. Invitations (Attachment A) to participate in the survey will be sent to parents/guardians via the panel provider and to stakeholders via email and support from FNS.

A privacy statement will be presented at the top of the first screen of the screener. For respondents who qualify for the survey, they will agree to participate and electronically sign the consent form prior to the start of the survey questions. The recruitment and screening of respondents will coincide with the time frame for the initiation of the research project (within 2 weeks following final OMB approval). The privacy statement, screener, consent form, and survey questions are provided in Attachment B.

Compensation

It is customary for panel providers to offer points for participation in the surveys. Accumulated points over many surveys can typically be traded for small monetary gifts, merchandise, or entry into a sweepstakes. Point systems are part of the numerous other panel management activities conducted by the panel providers to keep panelists engaged. However, the price of the sample mostly depends on incidence rates and therefore does directly correlate to the panel management cost incurred by the sample provider. Thus, when using an online sample, the Federal government does not directly provide incentives to the participants; rather, the Federal government receives access to the sample that may or may not be incentivized by the panel provider.

We will not provide compensation to the stakeholder respondents, as they will be identified by FNS and invited to share their input on the concepts.

Data Analysis

After completing the screener and consent form, participants who qualify will proceed to the main survey in the appropriate language (Attachment B). The survey will contain several modules described below:

Questions for Monitoring Quotas and Representation of Parents/Guardians

The survey will ask questions to ensure the inclusion of parents from different states (including states rolling out Summer EBT in 2024), various races/ethnicities, diverse geographies (including rural areas), born in different countries, with lower income levels, and participating/not participating in other nutrition/cash assistance benefits programs.

Concept Testing Questions

Respondents will be asked to focus on ideas/themes when reviewing three distinct campaign concepts (presented in random order) about food programs for children in the summer months. They will rate the concepts on key attributes related to being easy to understand, motivating, relevant, and grabbing their attention. Also, respondents will provide free responses about why they like or suggestions to improve the concepts. This data will help to refine the visual representations of the brand, messaging, and creative development.

Concept Preferences

Respondents will receive questions about their most and least preferred campaign concepts and designs for program names. They will also be able to share the information they would like to know (or families in their community need to know) about the summer food programs in an open-end, free response question. These data along with the concept testing responses will guide refinements to the visual representations of the brand, messaging, and creative development of Campaign materials.

Information sources

Parent respondents will receive questions about the communication channels they prefer the most to learn more about the summer nutrition programs, including specific digital channels. Also, they will receive a question about people in the community they trust the most to share this information, as we understand that many underserved communities are historically hesitant to trust government agency and programs. These data will help guide the strategy for outreach and communications to boost awareness of the summer nutrition programs.

Demographics

The final module will collect demographic information not included in the screening criteria for parents, including parent/guardian type, gender, and age. The bulk of the demographic data will be used to develop cross-tabulations that will enable survey analysts to compare findings across key audience subgroups (e.g., race, ethnicity, locality (urban/suburban/rural)). Demographic questions for stakeholders include location and organization type to pinpoint difference across stakeholder subgroups.

Qualitative Data

All qualitative feedback received will be entered into an excel spreadsheet for further analysis. Qualitative data will be analyzed for high level themes and considered descriptive and directional. No attempt will be made to generalize findings as nationally representative. Qualitative data will be used to refine Campaign creative concepts.

Quantitative Data

Quantitative data received will be analyzed in SPSS statistical software platform to run frequencies, percentages, and mean scores for rating scale responses and frequencies and percentages for questions that ask respondents to select their top three responses.

Outcomes/Findings

The results gathered from the campaign concept testing will be used to provide guidance to to further refine ads and outreach materials, including messaging and visual representations, for the public awareness campaign.

Research summary findings of aggregate data will be primarily for internal agency use. We will not identify any of the research participants in the documents and reports.

8. Confidentiality:

The survey is anonymous and does not require the collection of any personal information like names or contact information. The survey collects demographic information to inform a culturally driven, audience-specific Campaign and to provide feedback on creative and messaging.

No individual identification data will be shared in reports or with the public. FNS will not share personal data with any third parties.

Using the data collection instrument (survey) in Attachment B, all participants will receive a privacy statement and consent form. The privacy statement will inform the participants that all opinions they provide will not be shared with anyone outside this study, except as otherwise required by law, and none of their responses will be associated with personally identifiable information (PII). Participants will also be informed that the findings will be presented as a summary.

The OMB public burden statement for this data collection will be displayed upon participants' entry into the screener. Since the OMB public burden statement will be a part of the screener, no additional burden hours are associated with it.

Furthermore, the consent will be located on the first page of the online survey; participants will be required to submit electronic acknowledgement by clicking a button in the survey prior to proceeding to the rest of the survey.

Additional steps employed to notify the respondents about their privacy are as follows:

As part of the conditions of employment, all trained staff working on the project have signed a confidentiality agreement (Attachment C) prohibiting them from discussing any information about the research studies they work on with anyone not involved with the project.

Federal Costs:

It is estimated that Federal employees will spend approximately 30 hours overseeing this collection in 2023 with an average of a GS-14, step 1 wage. Using the hourly wage rate of \$63.43 for a GS-14, step 1, Federal employee from the 2023 Washington, DC, locality pay table, the estimated costs equal \$1,902.90 plus \$570.87 in fringe benefits for a total of \$2,473.77.

Contractor costs to the Federal Government will total \$25,000.00 over the course of this collection based on fully loaded rates and other direct costs. When combining the Federal employee and contractor costs, the total annual cost to the Federal Government for this information collection is estimated at \$27,473.77.

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.

9. Research Tools/Instruments:

- **Attachment A:** Survey Invitation
- **Attachment B:** Survey – includes Privacy Statement, Screener, and Consent Form
- **Attachment C:** Confidentiality Form