



Food and Nutrition Service

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Food and Nutrition Service (FNS)

DATE: January 5, 2024

SUBJECT: Justification for change in protocols for concept mapping and interview activities approved under 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 non-substantive changes 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 for the following non-substantive changes to the concept mapping and interview recruitment processes and materials:

1. Increase the number of individuals who receive concept mapping recruitment emails to 84. The currently approved information collection allows 54 individuals to be contacted.
2. Increase the number of concept mapping recruitment emails to two. The currently approved information collection includes one recruitment email.
3. Changes to the language in the concept mapping materials to explain the purpose of the data collection activity more clearly.
4. Add concept mapping instructions referenced in OMB-approved reminder emails to participants, but not included in the original ICR package.
5. Remove the words “Have you struggled to find healthy and affordable food? Many in Puerto Rico have” from the OMB-approved flyer for interview recruitment through local

partners.<sup>1</sup>

**Change #1: Increase the number of individuals who receive concept mapping recruitment emails to 84.** The currently approved information collection allows 54 individuals to be contacted. The increase in the number of persons contacted through recruitment is preferred because the initial request of 54 persons to recruit 42 persons, which assumed a 77 percent participation rate, is highly unlikely. To reach the target number of 42 participants, we would like to increase the number of persons recruited to 84, which assumes a more realistic 50 percent participation rate among the targeted sample.

**Change #2: Increase the number of concept mapping recruitment emails to two.** The currently approved information collection allows one recruitment email (appendix K.1/K.3). The additional recruitment activity is warranted because the initial request assumed one email contact would be sufficient to achieve our desired participation rate. With the additional of a follow up recruitment email (appendix K.5/K.6), we anticipate a 32 percent response rate to our initial recruitment email and a 26 percent response rate to our follow up email, yielding a combined 50 percent response rate. These changes were prompted by recent data collection projects conducted in Puerto Rico that provided a more realistic basis for planning recruitment activities.

The number of respondents, number of responses, time, and total cost to complete the concept mapping activities is impacted by change numbers 1 and 2 (see attached updated burden estimate). The changes do not ask respondents to submit any new or additional documentation to FNS. These changes will result in the following changes to respondent burden:

- *Number of Respondents and Nonrespondents:*
  - Increase of 30 respondents (from 12,632 to 12,662 respondents).
- *Frequency of Response:*
  - Increase of 0.0006 responses per respondent (from 5.0532 to 5.0537 responses per respondent).
- *Total Annual Responses:*
  - Increase of 159 responses (from 63,831 to 63,990 responses).
- *Hours per Response.*
  - Decrease of 0.0001 hours per response (from 0.0784 to 0.0783 hours per response).
- *Total Annual Burden:*
  - Increase of 7.6410 burden hours (from 5,005.0813 to 5,012.7223 hours).
- *Total Annualized Cost of Respondent Burden:*
  - Increase of \$92.28 (from \$68,496.81 to \$68,589.09).

NOTE: The change to the cost of respondent burden also reflects the correction of an error in the original ICR submission that was carried forward to the last approved burden estimate (May 2023). Hourly rates for business respondents (for profit and not for profit) for two instruments (K.1/K.3 and K.2/K.4) were incorrectly listed as \$60.81 and have been corrected in the updated version attached here.

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<sup>1</sup> We received a one-time approval for this change via email in August 2023 under the condition that it would be documented in the next change justification request.

**Change #3: Changes to the language in the concept mapping materials to explain the purpose of the data collection activity more clearly and be more inclusive.** These changes describe the concept mapping activities more accurately and in plainer language. These changes reflect a deeper understanding of the methodology following the groupwisdom™ software training and our Spanish translation efforts, which prompted us to find shorter and simpler ways of communicating both in English and Spanish. Wording changes to communications with participants are necessary to describe in more precise terms the nature of the concept mapping task. Other wording changes reflect a move toward more inclusive participation. For example, previously approved materials referred to participants as ‘stakeholders.’ That term has been changed to ‘interested parties,’ which recognizes that one does not need to be invested (holding stakes) to contribute valuable information.

Changes were made to the following appendices: F.1/F.11, F.2/F.12, F.3/F.13, F.4/F.14, F.5/F.15, F.6/F.16, F.7/F.17, F.9/F.19, K.1/K.3, and K.2/K.4, attached here.

These changes do not ask respondents to submit any new or additional documentation to FNS. The estimated time to complete the concept mapping activities is not impacted by these changes.

**Change #4: Approval for concept mapping instructions referenced in OMB-approved reminder emails to participants, but not provided in original ICR package.** We request approval of the attached instructions for participants to access the groupwisdom™ platform and record their brainstorming ideas during the idea generation step (appendix F.5.1/F.15.1) and to sort and rate the brainstorming ideas during the idea structuring step (appendix F.6.1/F.16.1). The instructions (appendices F.5.1/F.15.1 and F.6.1/F.16.1) will be attached to the already approved email messages (Appendix F.5/F.15 and F.6/F.16, respectively) we send participants prompting them to record their ideas or to begin the sorting and rating task.

Participant time for reading the instructions and completing activities was accounted for in our original burden estimates and has been redistributed across the email messages and instructions in the attached updated version of the burden table. The change does not ask respondents to submit any new or additional documentation to FNS.

**Change #5: Remove the words “Have you struggled to find healthy and affordable food? Many in Puerto Rico have” from the OMB-approved flyer for interview recruitment through local partners.** We would like to remove this language so that the flyer might draw some people who are food secure. The intent was to use the flyer to get additional interview participants (both food secure and insecure) if the survey sample didn’t generate enough respondents.

This change does not ask respondents to submit any new or additional documentation to FNS. The estimated time to complete the interview activities is not impacted by the change.

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:

- New concept mapping follow-up recruitment email (change #2):
  - K.5 Recruitment Followup Email\_01042024.docx
  - K.6 Recruitment Followup Email in Spanish\_01042024.docx
- Revised concept mapping materials (change #3):
  - F.1 Concept Mapping Welcome Email\_01042024.docx
  - F.11 Concept Mapping Welcome Email in Spanish\_01042024.docx
  - F.2 Reminder Email for First Concept Mapping Meeting\_01042024.docx
  - F.12 Reminder Email for First Concept Mapping Meeting in Spanish\_01042024.docx
  - F.3 Advance Material for First Concept Mapping Meeting\_01042024.docx
  - F.13 Advance Material for First Concept Mapping Meeting in Spanish\_01042024.docx
  - F.4 First Concept Mapping Meeting Facilitator Guide\_01042024.docx
  - F.14 First Concept Mapping Meeting Facilitator Guide in Spanish\_01042024.docx
  - F.5 Additional Ideas Concept Mapping Email\_01042024.docx
  - F.15 Additional Ideas Concept Mapping Email in Spanish\_01042024.docx
  - F.6 Instructions for Sorting and Rating Email\_01042024.docx
  - F.16 Instructions for Sorting and Rating Email in Spanish\_01042024.docx
  - F.7 Second Concept Mapping Meeting Scheduling Email\_01042024.docx
  - F.17 Second Concept Mapping Meeting Scheduling Email in Spanish\_01042024.docx
  - F.9 Advance Materials for Second Concept Mapping Meeting\_01042024.docx
  - F.19 Advance Materials for Second Concept Mapping Meeting in Spanish\_01042024.docx
  - K.1 Recruitment Email Concept Map\_01042024.docx
  - K.3 Recruitment Email Concept Map in Spanish\_01042024.docx
  - K.2 Concept Mapping Informed Consent Form\_01042024.docx
  - K.4 Concept Mapping Informed Consent Form in Spanish\_01042024.docx
- New concept mapping participant instructions (change #4):
  - F.5.1 Brainstorming Instructions\_01042024.docx
  - F.15.1 Brainstorming Instructions in Spanish\_01042024.docx
  - F.6.1 Sorting and Rating Instructions\_01042024.docx
  - F.16.1 Sorting and Rating Instructions in Spanish\_01042024.docx
- Revised interview recruitment flyer (change #5):
  - I.3 Study Announcement for Local Community Partners\_Spanish\_01042024.docx
  - I.6 Study Announcement for Local Community Partners\_Spanish\_01042024.docx
- Currently approved burden:
  - Appendix T Total Public Burden Hours and Cost\_UPDATED 05042023.xlsx
- Updated burden:

- o Appendix T Total Public Burden Hours and Cost\_UPDATED 01042024.xlsx