OMB Submission: Part A—Justification
(Revised Draft)

Evaluation of the Impact of the Summer Food for Children Household-Based Demonstrations on Food Insecurity

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A.1 EXPLAIN THE CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY. IDENTIFY ANY LEGAL OR ADMINISTRATIVE REQUIREMENTS THAT NECESSITATE THE COLLECTION. ATTACH A COPY OF THE APPROPRIATE SECTION OF EACH STATUTE AND REGULATION MANDATING OR AUTHORIZING THE COLLECTION OF INFORMATION.

Authorizing Legislation

This is a new information collection. In the 2010 Agriculture Appropriations Act (P.L. 111-80), Section 749(g), Congress authorized demonstration projects to develop and test methods of providing access to food for low-income children in urban and rural areas during the summer months when schools are not in regular session, as well as a rigorous independent evaluation of the projects regarding their effectiveness. The data being collected under this submission are necessary to meet the Congressionally-mandated requirement for an independent evaluation of the Summer Electronic Benefit Transfer (SEBT) for Children Demonstration being conducted by FNS under this authorizing legislation.

The first year of the SEBT for Children Demonstration, 2011, is a proof-of-concept (POC) period. The actual demonstration will begin in 2012. The data being collected under this submission are for both the POC year and the actual demonstration year.

Background

Very Low Food Security Among Children During the Summer Months

Despite the existence of three USDA food programs that provide meals directly to children, many children are not food secure and some meet the standard for Very Low Food Security (VLFS). Furthermore, the available evidence suggests that levels of VLFS are even higher during the summer months when most children are not in school. During the school year, most children in low-income households (income ≤185 percent of the poverty level) have access to free or reduced-price meals through the School Breakfast Program (SBP) and the National School Lunch Program (NSLP). In contrast, summer access to meals through the Summer Food Service Program (SFSP) is much more limited. There are significant geographic gaps in the availability of the SFSP—even in those communities where the program operates, rates of participation by eligible children are well below rates of participation for the SBP and NSLP. Gaps in coverage by the SFSP are among several factors responsible for the summer spike in VLFS.

National data for 2008 show that 21 percent of all ***households with children*** experienced low or very low food security, and 1.5 percent of all ***children*** experienced VLFS (Nord et al. 2009). Food insecurity is considerably higher among the low income population; 39 percent experienced low or very low food security (17 percent VLFS) which translates to 3.1 percent of VLFS among children. In addition, 20 percent of food insecure households obtained emergency food from a local food pantry or emergency kitchen, suggesting that households at greatest risk of VLFS seek food assistance from multiple sources (Nord et al. 2009). In fact, in 2009, 33 percent of families with children visiting food pantries in the

Feeding America National Network had VLFS, and another 43 percent had low food security (Mabli et al. 2010). National data from the Current Population Survey (CPS) indicate that food insecurity changes seasonally. Households with school-age children have a higher prevalence of food insecurity in the summer, and rates of food insecurity were greater in states with fewer SFSP and summertime NSLP meals (Nord and Romig 2006). The summer spike in food insecurity among children is consistent with anecdotal reports that emergency kitchens see more children accompanying adults in summer months.

Congressionally Mandated Summer EBT for Children Demonstrations

The SFSP was implemented in 1975 to reduce the risk that children in low-income households would miss meals during the summer when they have little or no access to the NSLP and SBP. Research suggests that an expanded SFSP could, in principle, substantially reduce, though not eliminate, the summer spike in VLFS among children (Nord and Romig 2006). However, logistical and other practical considerations would present barriers to such expansion. The SFSP is operated by local community-based organizations in churches, recreation centers, schools, and the like. It would be challenging to find additional program operators and locations to expand the program sufficiently to dramatically increase access to it. Furthermore, even in those areas where substantial expansion of the SFSP would be feasible, rates of participation by eligible children would likely remain below those for the NSLP and SBP. An earlier evaluation of the SFSP reported various barriers to SFSP participation, including lack of transportation, lack of publicity about the program, limited days and hours of site operations, lack of program activities, and parents' concerns about neighborhood safety (Gordon and Briefel 2003). In addition, most SFPS sites operate for eight weeks or less, leaving low-income children with several weeks in the summer with no SFSP or alternative program for meals.

In response to the high prevalence of VLFS among low-income children when school is not in session, Congress has mandated that USDA implement demonstrations of two approaches to reducing the risk that children will miss meals during the summer. The first of these demonstrations will enhance the existing SFSP so that it can serve more children in the demonstration sites. The second of these demonstrations, which is the subject of this evaluation, will use existing SNAP and WIC benefit delivery systems to enhance the food purchasing power of households with eligible children during the summer months. More specifically, the benefits will be delivered through the electronic benefit transfer (EBT) procedures used by the SNAP and the WIC program. This Summer EBT Benefits for Children demonstrations will supplement rather than replace SFSP in the demonstration sites.

FNS will use existing SNAP and WIC benefit delivery systems to supplement the food purchasing power of households with eligible children during the summer months. In authorizing the demonstrations, Congress mandated that USDA provide for their rigorous independent evaluation. The demonstrations and evaluation will provide USDA and Congress with comprehensive research findings that will allow policy makers to determine whether the SEBT for Children methodology is a feasible and effective strategy for reducing VLFS, reducing low food security, and improving nutrition status among children in low-income households.

Evaluation Objectives

The evaluation of SEBT for Children has four broad objectives: (1) to examine the impact of SEBT for Children benefits on children and their families, (2) to describe receipt and use of the benefits, (3) to examine the feasibility of implementing SEBT for Children benefits, and to document its costs, the approaches used and the challenges and lessons learned during the demonstrations and (4) to assess the feasibility of implementing three different models: a separately operating program using the WIC system; a separately operating program using the SNAP system; and a hybrid system where SEBT for Children benefits are included in benefits for SNAP participants.

A.2 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.

This section of the supporting statement provides an overview of the research design and data collection efforts planned to meet the overall objectives of the *Evaluation of Summer Electronic Benefit Transfers for Children Demonstrations*.

Overview of the Research Design

The evaluation design includes two components: an Impact Study and an Implementation Study, reflecting the main evaluation objectives.

Impact Study

The USDA/FNS released a Request for Application (on August 11, 2010 which closed October 29, 2010 under OMB Control Number 0584-0512, expiration 9/30/2012) to States that are implementing either EBT systems for SNAP or for WIC. From among those States, USDA has awarded five grants in Year 1 (school year 2010/11), the proof-of-concept year and plans to award 15 grants in Year 2 (school year 2011/2012), the full demonstration year. In Year 1, 2,500 children in each site will receive the SEBT for Children benefits. In Year 2, 5,000 in each site children will be receive the benefits.

Consenting households containing one or more children certified for the free- and- reduced price meals will be randomly assigned to a treatment group that will receive the SEBT for Children or to a control group that will not. Children in both groups will remain eligible for the SFSP. The evaluation team will provide technical assistance to each of the grantees in the proof-of-concept (POC) and demonstration years to help the grantees create the household lists of all eligible households (the sampling frame). Once the grantee has obtained consent to have the contact information released to the evaluation team, the team will use the information to randomly assign households to the treatment and control condition and to select a subsample to participate in the evaluation. In the POC year, assuming 2.6 children per household, it is expected that 960 households in each site will be selected to receive the SEBT for Children. In that year, the site-level final evaluation sample (i.e., receiving the household survey) will consist of 1,000 households per site (500 treatment and 500 control). In Year 2, using the same assumption, approximately 1,920 households per site will receive the SEBT for Children. In that year, the evaluation sample will consist of 1,800 households per site (900 treatment; 900 control).

In each year, households in each of the two evaluation samples will be surveyed at two points in time; a baseline survey will be administered in the spring, before the end of the school year, and a follow-up survey in the summer (see Appendices A & B, respectively). These surveys will gather data on the food security of children in the household, some key healthy eating habits, such as eating breakfast, and the consumption of healthy foods such as fruits and vegetables, low-fat dairy products, whole grains, and the consumption of discretionary foods, and other outcomes, including participation in other public or private nutrition assistance programs. By comparing the values of these measures from the follow-up survey for treatment households and control households (while controlling for baseline characteristics), the evaluator will obtain rigorous estimates of the impacts of SEBT for Children. In the full-demonstration year, when the sample is larger, it will be possible to compare outcomes between the WIC-based (i.e., benefits are from the WIC-approved food list) and SNAP-based approaches.

In addition, extant administrative records from EBT vendors will be used to track benefit acceptance, usage, and other information on the full sample of households assigned to the demonstration (approximately 960 households per site in Year 1 and 1,920 households per site in Year 2).

Goals of the Proof of Concept and Full Demonstration Years

The Proof of Concept (POC) year is designed to test the feasibility of the Summer EBT models and the evaluation methods. Lessons learned from the POC year on program operations that can inform the Full Demonstration year may pertain to the recommended sizes of the demonstration areas; the development of accurate lists of eligible households; the consent process; outreach, information and training provided to parents; and rules related to the issuance and use of EBT cards.

In addition, we expect that there will be lessons learned from the household data collection. These may include: whether there are major issues with expected response rates and challenges to obtaining the effective sample necessary to detect required MDDs; how baseline data collection improves the ability to locate households in the summer; and whether specific items on the instrument should be refined. In addition, the research design and analysis plans may be revised to some degree, most likely to reflect implications in any changes made to the SEBT for Children demonstration requirements or the data collection approach.

The number of grantees and the relative sample sizes for the household data collection reflect the different goals of the POC year and the full demonstration year. In the POC year, benefits will be offered to 12,500 and there will be a total interview sample of 5,000 households. In the demonstration year, benefits will be offered to a total of 75,000 children and the interview sample will include 27,000 households.

Measures

Exhibit A.1 provides an overview of the research objectives for the impact study, the outcome measures and the data sources.

Food Security

To assess food security, we will assess the target child's household's food security with the 18-item survey module developed by USDA to assess and monitor food security in large-scale population studies such as the Current Population Survey and NHANES; this instrument has well-tested and well-documented sensitivity and specificity for measuring food security in households with children (Economic Research Service (ERS 2010a, 2010b; National Research Council 2005, 2006; Nord and Hopwood 2007). The evaluation's primary outcome is very low food security (VLFS) among children, but all categories of food security are of interest for the evaluation. The prevalence of VLFS among children, low food security, marginal food security, and high food security in summer as well as spring-summer differences will be compared between treatment and control groups. Additionally, because food security is an outcome measure used in other FNS studies, impact comparisons across programs may be feasible. FNS is evaluating enhancements to the Summer Food Service Program separately from this evaluation of SEBT for Children, but the agency is including the 30-day food security scale for the SFSP "backpack" and rural home delivery demonstrations. The use of this common metric in both sets of demonstrations can facilitate future comparison of these different approaches to summer feeding.

Nutritional Status

The authorizing legislation for the SEBT for Children calls for estimating the impact on nutritional status. For this evaluation, we will proxy for nutritional status using well-tested measures specific kinds of food consumption shown to be highly associated with nutritional risk or food insecurity among school-age children (Newby 2007; Briefel et al. 2008; Reedy and Krebs-Smith 2010; Taveras et al. 2010). To facilitate comparisons between the SNAP, SNAP-hybrid, and WIC approaches, food consumption measures will include foods contained in the general dietary guidelines for children and adolescents and/or the WIC food package: fruits and vegetables, low-fat dairy foods, whole grains, eggs, and peanut butter. In addition, we will include a few discretionary foods that are major sources of solid fats and added sugars (SoFAS) in the diets of low-income children (sugar-sweetened beverages, pizza, french fries/other fried potatoes, and grain-based desserts) (Reedy and Krebs-Smith 2010). These food consumption questions have been successfully used in the National Health and Nutrition Examination Survey (NHANES). Scoring algorithms are available to translate the frequency of consumption information into dietary guidelines-type measures (e.g., the frequency of consumption of 10 fruits and vegetables will be translated to daily fruit and vegetable cup equivalents). A question on breakfast eating is included because eating breakfast is associated with higher dietary quality and nutrient intake among school-age children (Newby 2007; Briefel et al. 2008).

Body mass index (BMI) is a reliable measure of children's long-term nutrition status if it can be measured accurately. We considered including children's BMI in the study as an indicator of children's nutrition status, but did not expect that BMI would change in the short-term (i.e., in 8-10 weeks of a summer demonstration not aimed at changing weight status).

Food Expenditures

The impact of the SEBT for Children on food expenditures is a critical intermediate outcome in the causal chain leading to improved food security. Impacts on food expenditures at the household level will be translated into economic impacts at the community level. The benefit may lead households to change food purchasing behaviors (e.g., quantity/types of food, including purchasing fresh fruits and vegetables) as well as away-from-home food spending (e.g., increasing or decreasing frequency of fast food or other restaurant meals). Household-level responses to the benefit affect the foods available to children to consume, regardless of location, and therefore are useful intermediate variables to help explain changes in children's food security.

Participation in Nutrition Assistance Programs

Household-level participation in food nutrition assistance programs, including household use of emergency food sources (e.g., food pantries and soup kitchens), is an important outcome affecting food security. Receipt of the summer benefit may affect participation in the SFSP or participation in programs such as SNAP or WIC. Receipt or awareness of the summer benefit may affect applications for free/reduced price NSLP and SBP meals. More specifically, we will ask about participation in SNAP and

WIC. We will also ask respondents if a target child has participated in SFSP and, if so, the number of days per week and weeks of participation.

Exhibit A.1. SEBT for Children Evaluation Research Objectives, Outcomes, Subgroups for Analysis, Data Sources, and Analysis Methods

Research Objective	Outcome	Subgroups Represented in Analysis	Data Sources	Study Year	Analysis Methods
A. SEBT for Children Process					
1. Determine the operational feasibility of the SNAP, SNAP hybrid, and WIC approaches to SEBT for Children		Each site	Stakeholder interviews Household survey	POC & Full Demonstration	Implementation analysis
2. Describe and document the process of project implementation, including:					
2.1. Process for distribution of demonstration cards to participating households		By site	Stakeholder interviews	POC & Full Demonstration	Implementation analysis
2.2. Timing and methods of informing parents and caretakers of the availability, benefits, and procedures of the demonstration		By site	Stakeholder interviews Household survey	POC & Full Demonstration	Implementation analysis
2.3. Process for obtaining consent and the rates of consent		By site	Stakeholder interviews	POC & Full Demonstration	Implementation analysis
2.4. Design, delivery, timing, and effectiveness of training made available to participating schools, parents, food retailers and others		By site	Stakeholder interviews Household survey	POC & Full Demonstration	Implementation analysis
2.5. Roles and responsibilities of those involved in implementation in the State, demonstration schools, and EBT processors		By site	Stakeholder interviews	POC & Full Demonstration	Implementation analysis
2.6. Procedures for and frequency of replacement cards for benefits reported lost, stolen or destroyed		By site	Stakeholder interviews	POC & Full Demonstration	Implementation analysis
2.7. Administrative controls and other actions to maintain program integrity and prevent loss, theft and improper issuance		By site	Stakeholder interviews	POC & Full Demonstration	Implementation analysis
2.8. Role and involvement of other community organizations, such as local SNAP offices, local WIC offices, and anti-hunger advocates		By site	Stakeholder interviews	POC & Full Demonstration	Implementation analysis
2.9. Challenges encountered and resolved		By site	Stakeholder interviews Household survey	POC & Full Demonstration	Implementation analysis
B. SEBT for Children Impacts					
3. Determine the impact of participation in SEBT for Children on the level of very low food security (VLFS) among children among demonstration participants	• VLFS in last 30 days • Low food security in last 30 days • Marginal food security in last 30 days • High food security in last 30 days	• Subgroups defined by: • Demographic and socioeconomic characteristics • School year food security/nutritional status • Past participation in nutritional assistance programs • Groups of sites/approach	Household surveys	POC & Full Demonstration[a,b]	• Comparison of prevalence of VLFS in summer among children between treatment and control groups • Comparison of spring-summer difference in VLFS among children

					between treatment and control groups
4. Determine the impact of participation in SEBT for Children on the nutritional status of demonstration participants	• Frequency of child's consumption of healthful foods and selected discretionary foods in last 30 days (as defined by the dietary guidelines/WIC food package) • Eating breakfast	Same as above	Household surveys	POC & Full Demonstration[a]	Comparison of nutritional status of children between treatment and control groups
5. Compare and contrast the impacts on very low food security and nutrition status among children for households that participate in SNAP vs. households that do not participate in SNAP	Same as for Objectives 2 and 3	• Same as above • Assume SNAP participation is in prior school year	Household surveys	Full Demonstration	• Subgroup analysis • Test whether impacts are different between groups
6. Determine how impacts on very low food security and nutrition status among children vary by:					
6.1. Approach (SNAP, SNAP hybrid, WIC)	Same as for Objectives 2 and 3	Limited to large subgroups	Household surveys	Full Demonstration	• Impacts estimated for groups of sites aggregated by approach • Test whether impact differ by groups of sites
6.2. Recipient characteristics (e.g., grade level, household size and income, number of children in household, urban/rural location of recipient household, etc.)	Same as for Objectives 2 and 3	Limited to large subgroups	Household surveys	Full Demonstration	• Subgroup analysis • Test whether impacts are different between groups
6.3. Location in urban and rural areas, which will be varied across the 2012 demonstrations	Same as for Objectives 2 and 3	Groups of sites aggregated by whether they are in urban or rural areas	Household surveys	Full Demonstration	• Subgroup analysis • Test whether impacts differ by groups of sites
6.4. Participation in the SFSP, WIC, and NSLP/SBP programs	Same as for Objectives 2 and 3	Limited to large subgroups; based on school year participation in these programs	Household surveys	Full Demonstration	• Subgroup analysis • Test whether impacts are different between groups
6.5. Monthly dollar value of demonstration benefit, which may be varied in some of the 2012 demonstrations	Same as for Objectives 2 and 3	Groups of sites aggregated by amount of benefit	Household surveys	Full Demonstration	• Subgroup analysis • Test whether impacts differ by groups of sites
6.6. Acceptance, receipt and usage of a household-based benefit among various groups:	• Household food expenditures	Limited to large subgroups by different levels of	• Household surveys	Full Demonstration	• Estimate impact on food expenditures

--families that received and used a household-based demonstration benefit card vs. families who did not accept or who received but did not use a household-based demonstration benefit card) --families that redeemed benefits mainly at supermarkets or not --families that exhausted benefit or not (by end of month, sooner)	• Experiences using benefits and satisfaction with program (treatment group) Same as for Objectives 2 and 3	acceptance, receipt, and usage of benefits	• Program administrative data (acceptance, receipt, and usage)		• Describe food security and nutritional status by acceptance, receipt, and usage of benefits • Cannot make causal inference
6.7 Baseline levels of household food security and nutrition status among children	Same as for Objectives 2 and 3	Limited to large subgroups	Household surveys	Full Demonstration	• Subgroup analysis • Test whether impacts are different between groups
6.8. Household food expenditures (e.g., households in which the summer benefit increases total household food expenditures vs. households in which the summer benefit is used to free up resources for non-food items)	• Household food expenditures Same as for Objectives 2 and 3	Limited to large subgroups	Household surveys	Full Demonstration	• Estimate impact on food expenditures • Describe food security and nutritional status by patterns of summer food expenditures • Cannot make causal inference
6.9. Where children eat meals during the summer (e.g., SFSP site, relatives, home, etc.)	Same as for Objectives 2 and 3	Limited to large subgroups	Household surveys	Full Demonstration	• Describe food security and nutritional status by where children eat meals during the summer • Cannot make causal inference
7. Assess the impact of the availability of a summer benefit on the aggregate number of children or households certified for or participating in NSLP, SBP, SNAP and SFSP	• Certification for free/reduced-price meals (NSLP and SBP) in school year after demonstration • Participation in SNAP summer and school year after demonstration • SFSP participation • Use of emergency food pantries and kitchens • Strategies to obtain food over the	By site	• Program administrative data • Household surveys	Full Demonstration	• Comparison between groups • Comparison of aggregate numbers between the school year and the summer

	summer				
C. SEBT for Children Costs					
8. Determine and document the total and component costs of implementing and operating the demonstrations to support distinctions between and comparisons among:				POC and Full Demonstration	
8.1. The organization incurring costs (Federal, State , local, and EBT processor)	• Total costs • Total administrative costs • Benefit costs • Costs by component • Cost per child selected • Cost per participating child • Cost per child prevented from experiencing VLFS in summer	By site	• Program administrative data • Financial data • Stakeholder interviews	POC & Full Demonstration	Identifying and estimating component costs
8.2. Administrative costs of start-up	• Total administrative costs • Costs by component • Cost per child selected • Cost per participating child	By site	• Program administrative data • Financial data • Stakeholder interviews	POC & Full Demonstration	Identifying and estimating component costs
8.3. Administrative costs of ongoing operations	• Total administrative costs • Costs by component • Cost per child selected • Cost per participating child	By site	• Program administrative data • Financial data • Stakeholder interviews	POC & Full Demonstration	Identifying and estimating component costs
8.4. Benefit obligations and actual costs	• Benefit obligations • Benefit outlays • Benefit outlays per child selected • Benefit outlays per participating child • Benefit outlays per child prevented from experiencing VLFS in summer	By site	• Program administrative data • Financial data	POC & Full Demonstration	Identifying and estimating benefit obligations and outlays
8.5. Total, average, and range of costs (administrative and	• Total costs	By site	• Program	POC & Full	Identifying and

benefit) in the aggregate and per unit (per school, school-aged child and household; per reduction in child hunger).	• Total administrative costs • Benefit costs • Costs by component • Cost per child selected • Cost per participating child • Cost per child prevented from experiencing VLFS in summer		administrative data • Financial data • Stakeholder interviews	Demonstration	estimating component costs
8.6. Demonstration approach (SNAP, SNAP hybrid, or WIC)	• Total costs • Total administrative costs • Benefit costs • Costs by component • Cost per child selected • Cost per participating child • Cost per child prevented from experiencing VLFS in summer	By group of sites according to approach	• Program administrative data • Financial data • Stakeholder interviews	POC & Full Demonstration	Identifying and estimating component costs

Notes: [a] Standard errors will be larger in the POC year. [b] Impacts on VLFS among children will be assessed in the full demonstration year only.

Parents' Perceptions
We will ask parents about the ease and stigma of using the summer benefits, and about lost cards and other problems.

Implementation Study

Successful implementation of the demonstrations will require the involvement and cooperation of a number of state and local agencies and vendors in each demonstration site. Local school food authorities (SFAs), either individually or in combination, will constitute the demonstration sites; however, the state WIC, SNAP, or NSLP/SBP agencies will be the formal recipients of the USDA grants for the demonstrations, with legal responsibility for their implementation. Substantial cooperation, including data sharing, has been promised by the schools and school districts served by the SFAs as well as by the state education agency. EBT vendors for SNAP and WIC will deliver the SEBT for Children benefits to participating households. Finally, cooperation by retail merchants will be needed in order for households to redeem their SEBT for Children benefits for food.

The Implementation Study will address four research questions:

1. Are the three different models of SEBT for Children (a separately operating program using the WIC system (SEBT for Children-WIC approach); a separately operating program using the SNAP system (SEBT for Children-SNAP approach); and a system that incorporates SEBT for Children into existing SNAP accounts (SEBT for Children-SNAP hybrid approach) operationally feasible? If so, under what conditions?
2. How are the demonstrations implemented? What are the challenges encountered and lessons learned?
3. How much does it cost to operate the each of the three approaches to providing SEBT to Children? What are the components of the cost?

To address these research objectives, the team will collect a variety of data from organizations involved in the demonstrations. We will use stakeholder interviews, administrative reports, and documents to assess the operational feasibility of the demonstration (Objective 1) and to describe implementation and operations (Objective 2). We will collect expenditure reports and supplementary data from interviews to measure the costs of the demonstration, including administrative costs and benefit outlays (Objective 3). Below, we describe each type of data.

Stakeholder Interview Topics. The study team will conduct interviews with members of all stakeholder groups. These interviews will collect data to address all of the above objectives topics. In addition, stakeholder interviews will obtain respondents' views on the feasibility of continuing and replicating the demonstrations[1]. Finally, stakeholder interviews will clarify administrative cost reports and obtain data on expenses not covered by the demonstration grant, as discussed below.

Stakeholder interviews will be conducted with the following groups:

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[1] See Appendix D for instruments and interview protocols associated with State and local government entities. See Appendix E for instruments created for use with private businesses and organizations.

a) *Primary grantees:* For each site, the grant may be awarded to the State WIC, SNAP, or National School Lunch program/School Breakfast program (NSLP/SBP) Agency (see Appendix D).

b) *Other cooperating State partners:* The primary grantee may involve other State agencies. If the grantee is the NSLP/SBP Agency, it will need to partner with the WIC or SNAP agencies to establish a relationship with the EBT vendor. For WIC EBT, State vendor management may be involved in communications with retailers, and local WIC offices involved in card issuance and customer training. The State Education Agency may be involved with accessing and managing student data. Some States' central Information Technology (IT) agencies manage IT projects and/or operate data systems (see Appendix D).

c) *Participating SFAs:* The SFAs maintain lists of students approved for free/reduced-price meals, so they will lead the creation of lists of households eligible for the summer benefit (see Appendix D).

d) *EBT vendors:* Vendors will have the lead role in creating EBT cards and accounts, authorizing transactions, settling with retailers, and providing support to participants and retailers (see Appendix E).

e) *Summer Food Service Program (SFSP) sponsors and site operators:* These organizations may have a role in outreach or promotion of SEBT for Children, or providing sites for issuing cards or training participants (See Appendix D).

f) *Anti-hunger advocates/other community-based organizations:* These organizations might have a role in outreach or promotion of SEBT for Children, or providing sites for issuing cards or training participants (See Appendix D).

g) *Retailers*: Participants will redeem SEBT for Children benefits at SNAP/WIC-authorized retailers. The redemption process will be the same for both programs. SEBT for Children-SNAP participants will be able to buy all foods allowed for the regular SNAP program, and the SEBT for Children-WIC foods will be similar to the WIC program (see Appendix E).

Exhibit A.2 below shows the interview topics by stakeholder type. We plan to do three rounds of interviews in both the POC year and the full Demonstration year: in the spring to capture start-up activities; in the summer, while the benefit is being used; and in the fall, to document close-out activities and have stakeholders reflect on lessons learned.

Administrative Reports and Documents. Through arrangements with the SEBT for Children grantees, we will collect a variety of implementation and operations data from administrative reports and documents. The following is a list of data requirements. Data listed below will be collected for each demonstration year unless otherwise noted.

1. Descriptive information on the NSLP, SBP, and SFSP in the project area, including:
    a. number of schools offering NSLP with/without SBP,
    b. total enrollment in area schools
    c. number and percentage of students approved for free/reduced-price meals
    d. average daily participation in NSLP and SBP
    e. number of schools/other locations with after-school programs offering snacks
    f. number of SFSP sponsors, sites, and meals served

g. which children attended a FFVP or HUSSC school

2. Consent process information:
   a. number of households and eligible children identified
   b. number of households and eligible children refusing consent
   c. number of households and eligible children determined to be out of area/contact information invalid
   d. number of households and eligible children in final file for random assignment
3. EBT card issuance data: number issued, returned, replaced (monthly)
4. EBT system summary reports[2] (monthly):
   a. Number and dollar value of benefit redemption transactions
   b. Number of insufficient funds transactions
   c. Number of accounts locked for too many bad PIN entries
   d. Number and dollar value of refunds

Expenditure Reports and Other Cost Data. As one of the requirements of the grant for the SEBT for Children Benefits for Children project, the grantees will provide two types of expenditure reports to the evaluation. First, quarterly and annual administrative cost reports will identify expenditures of grant funds by the grantee and its partners (sub grantees) for personnel and other resources used to implement and operate the demonstrations. These reports will be the primary source of administrative cost information. Given the current budget pressures on State and local agencies, we expect that the vast majority of costs will be funded by the demonstration grant. The report will be structured to disaggregate costs by object (type of resource) and organization incurring the expense. Separate reports will be requested for startup and operating costs. Grantees are required to submit separate budgets for startup and operating costs, so they will be able to provide a similar breakdown of actual costs, once they set up the accounting appropriately.

Each grantee also will provide a quarterly report showing SEBT for Children amounts obligated (i.e., issued) and redeemed, both for the reporting month and cumulatively for the year.

Stakeholder interviews will include questions to identify demonstration costs not funded by the grant (see Appendices D and E). Once identified, we will use standard resource cost methods to (a) identify the activities and associated resources, (b) estimate the quantity of staff time and other resources used, (c) determine the unit cost of these resources (e.g., hourly pay rates), and (d) determine the total cost incurred by each organization. Stakeholders will be notified at the outset of the demonstration of this plan and encouraged to keep track of such unreimbursed costs.

Exhibit A.2 shows the data to be collected during stakeholder interviews. The topic sequence reflects the rollout of demonstration activities and the logical sequence for interviews.

Use of the Information

The information gathered in the data collection activities described above will be used by FNS to determine if SEBT for Children reduces the acute prevalence of very low food security (VLFS) among

[2] EBT system summary reports are generated routinely. The actual available reports will be determined during initial contacts with EBT vendors. In addition to summary data for the description of implementation and operations, the evaluators will collect and analyze data on individual EBT transactions.

children during the summer months when most children are not in school; and to determine the feasibility and costs of implementing SEBT for Children on a national scale. The data collection described in this document is essential for meeting the Congressional mandate for a rigorous evaluation of the impact of SEBT for Children. There is currently no other national effort that can address the research objectives of the proposed study.

A.3 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 bur

The study strives to comply with the E-Government Act of 2002 (Public Law 107-347, 44 U.S.C. Ch 36) by using CATI. By including programmed skip patterns, consistency and data range checks, these technologies reduce data entry error that often necessitate callbacks to respondents to clarify the responses recorded by an interviewer using pencil and paper to conduct an interview.

Sample tracking will be managed by our Field Management System (FMS), a major application composed of a set of interrelated applications that control all aspects of sampling, data collection, data cleaning, and delivery of survey data.

Exhibit A.2: Topics and Respondents for Stakeholder Interviews

Topic	Primary Grantees and Major Partners	SFAs	EBT Vendors	SFSP Sponsors	Community-based Organizations	Retailers
Plan demonstration and prepare application	✓✓	✓	✓			
Identify eligible children and households		✓✓				
Obtain consent for demonstration and evaluation	✓	✓✓				
Inform selected parents/caretakers	✓✓		✓			
Distribute SEBT for Children cards	✓		✓✓			
Technical assistance for schools	✓✓	✓				
Training and information for parents	✓✓	✓	✓	✓	✓	
Training for/support for retailers	✓✓		✓		✓	✓
Other training and public information	✓✓	✓	✓	✓	✓	✓
Project organization and management	✓✓	✓	✓			
Replace cards/other participant support	✓		✓✓			
Prevent/detect losses and abuse	✓		✓✓			✓
Involve local agencies or community organizations	✓✓	✓		✓	✓	
Successes, challenges and solutions	✓	✓	✓	✓	✓	✓
Feasibility of continuing and replicating demonstrations	✓✓	✓✓	✓✓	✓	✓	✓
Implementation and operational costs	✓	✓	✓	✓	✓	
Impact on program participation and operations	✓	✓		✓		

Notes:

✓✓ Indicates agency expected to be lead source(s) for topic.

"SFSP" includes local sponsors and site operators, and SFSP officials at SFA/school level.

"CBOs" include local anti-hunger advocates, organizations serving ethnic communities, other community/faith-based organizations.

A.4 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

The data requirements for the evaluation have been carefully reviewed to determine whether the needed information is already available. Efforts to identify duplication included a review of FNS reporting requirements, State administrative agency reporting requirements, and special studies by government and private agencies. It was concluded that no existing data sources can provide data needed to answer the study's research questions.

A.5 IF THE COLLECTION OF INFORMATION IMPACTS SMALL BUSINESSES OR OTHER SMALL ENTITIES, DESCRIBE ANY METHODS USED TO MINIMIZE BURDEN

Information being requested or required has been held to the minimum required for the intended use. Although smaller State agencies, SFAs and SFSP sponsors are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other State agency and SFA. Thus, they maintain the same kinds of information on file. Data requirements include interviews with retailer representatives. In addition, all grantees have agreed to participate in the evaluation and provide the necessary data. To minimize the burden on small retailers, we will interview representatives of the top three retail chains and two organizations representing independent retailers. Interviews will also be conducted with EBT vendors, however there are only six such vendors, none of which is a small business.

A.6 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 two times in 2011 and two times in 2012. Without this effort, FNS will not have the data necessary to estimate program impacts on participating children, or to examine how the demonstration sites implemented SEBT for Children, which will be used to produce the required report to Congress and inform future program decisions.

A.7 EXPLAIN ANY SPECIAL CIRCUMSTANCES THAT WOULD CAUSE AN INFORMATION COLLECTION TO BE CONDUCTED IN A MANNER:

- **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 three 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; or**
- **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 other special circumstances. The collection of information is conducted in a manner consistent with guidelines in 5 CFR 1320.5.

A.8 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

An announcement was published in the Federal Register on November 5, 2010 (Federal Register Volume 75, No. 214, Page 68317).

Consultations Outside the Agency

The evaluation's contractor, Abt Associates also has contracted for the consultation of Christopher Hamilton (Technical Reviewer). The evaluation's subcontractor, Mathematica Policy Research, had Fran

Thompson, National Cancer Institute, NIH (phone 301-435-4410), review the technical rigor of this effort. In addition, FNS has consulted with staff at the National Agricultural Statistical Service.

A.9 Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees

An incentive of a $10 gift card will be made to respondents of the household survey to improve response rates. No other gifts or incentives will be made to respondents. This consideration is necessary because of the very short window of opportunity to conduct the survey (approximately 6-8 weeks), which makes it essential for respondents to complete the survey in a timely fashion without repeated call backs. After reviewing the cooperation rates for the 2011 survey, we will review the effectiveness of the incentive and increase the incentive if necessary to increase cooperation in 2012.

A.10 Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy

The individuals participating in this study will be notified that the information they provide will not be released in a form that identifies them, except as otherwise required by law. No identifying information will be attached to any reports or data supplied to USDA or any other researchers.

Abt Associates Inc. has extensive experience in data collection efforts requiring strict procedures for maintaining the confidentiality, security, and integrity of data. The following data handling and reporting procedures will be employed to maintain the privacy of survey participants and composite electronic files.

- All project staff, both permanent and temporary, will be required to sign a confidentiality and nondisclosure agreement (see Appendix F). In this agreement, staff pledges to maintain the confidentiality of all information collected from the respondents and will not disclose it to anyone other than authorized representatives of the evaluation, except as otherwise required by law. Field data collectors are required to carry their signed pledge with them at all times while in the field and may be required to show it to respondents. Issues of confidentiality are also discussed during training sessions provided to staff working in the project.
- While in the field, data collectors are required to store all completed forms, surveys, and material with identifying information on it in a locked car trunk. If the data collector is in the field for several days, forms and materials are shipped to the central office by Federal Express, UPS or other traceable shipping service. Regular mail is not used to ship any material containing respondent information. Field staff are also instructed to avoid making photocopies of such material.
- Once in the central office, documents containing respondent information are kept in locked files cabinets. At the close of the study, such documents are shredded.
- Data gathered from the interviews will be combined into master respondent files. Immediately after each file is created, it will be assigned a unique identification number. Any

identifying information will be removed from the survey data and replaced with the identification number.

- Any respondent-identifying information will be contained only in a master list to be created and protected in secure storage, to which only a limited number of project staff pledged to maintain confidentiality will have access. The master list containing personal identifiable information (PII) on individuals doing business with FNS has been published as a Privacy Act Notice (system of records notice) titled Persons Doing Business with Food and Nutrition Service (FNS- 10) in the Federal Register Volume 65 pages 17251-52 to specify the uses to be made of the information in this collection.

In addition, the evaluation contractor has established a number of procedures to ensure the confidentiality and security of electronic data in their offices during the data collection and processing period. Standard backup procedures will be implemented for the central office computer system to protect project data from user error or disk or other system failure. Backups and inactive files will be maintained on tape or compact disks. The system servers will be maintained inside a secure locked area accessible only to authorized systems personnel. Files will be accessible only by authorized personnel who have been provided project logons and passwords. Access to any of the study files (active, backup, or inactive) on any network multi-user system will be under the central control of the database manager. The database manager will ensure that the appropriate network partitions used in the study are appropriately protected (by password access, decryption, or protected or hidden directory partitioning) from access by unauthorized users. All organizations using data on study participants will maintain security, virus, and firewall technology to monitor for any unauthorized access attempts and any other security breaches.

Institutional Review Board

Abt Associates maintains its own Institutional Review Board (IRB), which serves as the organization's administrative body that conducts prospective reviews of proposed research and monitors continuing research for the purpose of safeguarding research participants' rights and welfare (see Appendix G for the IRB approval notification). All research involving interactions or interventions with human subjects is within the purview of the Abt IRB. Abt Associates' IRB is the local agent responsible for ensuring that the organization's research: 1) meets only the highest ethical standards; and 2) receives fair, timely, and collegial review by an external panel. Abt Associates' IRB currently holds a federal-wide assurance (FWA) of compliance from the U.S. Department of Health and Human Services' Office of Human Research Protections (DHHS/OHRP). The FWA covers all federally supported or conducted research involving human subjects. All study materials and instruments for the SEBT for Children benefits evaluation will be submitted to and approved by Abt's IRB prior to fielding of the full surveys. We expect to re-submit all study materials to Abt's IRB again when the instruments have been pretested and finalized.

A.11 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

There are no personally sensitive questions contained in the data collection instruments. However, the sample frame obtained from SFAs will consist of children approved for free or reduced-price meals in the NSLP. While this information is ordinarily considered sensitive and confidential, it will be needed for random assignment. SFAs will request consent prior to releasing this information and will comply with all federal and state requirements, including FERPA, in the release of this information.

A.12 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.**

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

Exhibit A.3 shows sample sizes, estimated burden, estimated frequency of response, estimated annual responses per respondent, and estimated annualized cost of respondent burden for each part of the data collection and for total burden.

A.13 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 start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no capital, start-up, or annualized maintenance costs associated with this data collection for respondents.

A.14 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.

This includes the costs associated with the contractor conducting the project and the salary of the assigned FNS project officer. The cost to the Federal government for the all tasks associated with the Summer Electronic Benefits for Children (SEBT for Children) Demonstration is $85 million, as specified in the 2010 Agriculture Appropriations Act (P.L. 111-80), Section 749(g). This cost includes all study tasks, including design, pretests, sample selection, recruitment, information collection, analysis and report writing.

A.15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a new collection of information. This program change will add 15,969 burden hours to the OMB collection inventory.

Exhibit A.3: Estimated Respondent Burden

Respondent		Estimated No. Respondent	Responses Annually Per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Estimated Hourly Rate	Total Cost
Parents: Year 1	Completed	5,000	2	10,000	0.5	5,000	$7.25	$36,250
Parent s: Year 1 (*non-respondents)*	Attempted	2,150	2	4,300	0.05	215	$7.25	$1,559
Parents: Year 2	Completed	27,000	2	54,000	0.5	27,000	$7.25	$195,750
Parents: Year 2 *(non-respondents)*	Attempted	11,550	2	23,100	0.05	1,155	$7.25	$8,374
Primary Grantees and Major Partners– Process Study Interviews	Year 1 – April Interviews	20	1	20	3.00	60	$32.33	$1,940
	Year 1 – July Interviews	20	1	20	3.00	60	$32.33	$1,940
	Year 1 - September Interviews	20	1	20	1.50	30	$32.33	$970
	Year 2 – April Interviews	60	1	60	3.00	180	$32.33	$5,819
	Year 2 – July Interviews	60	1	60	3.00	180	$32.33	$5,819
	Year 2 - September Interviews	60	1	60	1.5	90	$32.33	$2,910
Primary Grantees – Cost Reports	Year 1	5	4	20	2	40	$32.33	$1,293
	Year 2	15	4	60	2	120	$32.33	$3,880
Primary Grantees – Feedback on Year 1 Field Procedures	Year 1	5	1	5	1	5	$32.33	$162
Participating SFAs	Year 1 – April Interviews	30	1	30	1.5	45	$32.33	$1,455
	Year 1 – July Interviews	30	1	30	1.5	45	$32.33	$1,455
	Year 2 – April Interviews	90	1	90	1.5	135	$32.33	$4,365
	Year 2 – July Interviews	90	1	90	1.5	135	$32.33	$4,365
EBT Vendors	Year 1 – April Interviews	20	1	20	2	40	$34.60	$1,384
	Year 1 July Interviews	20	1	20	2	40	$34.60	$1,384
	Year 1 – Sept. Interviews	20	1	20	2	40	$34.60	$1,384
	Year 2 - April Interviews	30	1	30	2	60	$34.60	$2,076
	Year 2 - July	30	1	30	2		$34.60	$2,076

Respondent		Estimated No. Respondent	Responses Annually Per Respondent	Total Annual Responses	Estimated Avg. # of Hours Per Response	Estimated Total Hours	Estimated Hourly Rate	Total Cost
	Interviews					60		
EBT Vendors, Continued	Year 2 - September Interviews	30	1	30	2	60	$34.60	$2,076
SFSP Sponsors	Year 1	15	1	15	1.5	23	$32.33	$727
	Year 2	45	1	45	1.5	68	$32.33	$2,182
Other CBOs	Year 1 – April Interviews	10	1	10	1	10	$34.60	$346
	Year 1 July Interviews	10	1	10	1	10	$34.60	$346
	Year 2 - April Interviews	30	1	30	1	30	$34.60	$346
	Year 2 - July Interviews	30	1	30	1	30	$34.60	$1,038
Retailers	Year 1 – April Interviews	25	1	25	1	25	$34.60	$865
	Year 1 July Interviews	25	1	25	1	25	$34.60	$865
	Year 2 - April Interviews	75	1	75	1	75	$34.60	$2,595
	Year 2 - July Interviews	75	1	75	1	75	$34.60	$2,595
TOTALS		46,175 [1}				35, 125		$299,897
Total—minutes						2,107,500		
Average response—hours						0.438 [2]		
Average response—minutes						26.29[2]		

[a] Sources: Bureau of Labor Statistics, National Compensation Survey, 2008. August, 2009, Bulletin 2720. (http://www.bls.gov/ncs/ncswage2008.htm): Parents: National minimum wage. State Agency Staff: Average hourly earnings of State and local government managers and professional workers; SFA Staff: Average hourly earnings of State and local government managers and professional workers; EBT Vendors: Average hourly earnings of private sector managers and professional workers; SFSP Operators: Average hourly earnings of State and local government managers and professional workers; Retailers: Average hourly earnings of private sector managers and professional workers; Advocates: Average hourly earnings of private sector managers and professional workers.

[1] Since some respondents are listed multiple times for the same year, the column does not sum to total number of respondents.
[2]Average number of hours and minutes are the totals divided by the three-year OMB clearance period.

A.16 For collections of information whose results are planned to be published, outline plans for tabulation and publication

Study Schedule

The schedule shown in Exhibit A.4 lists the expected period of performance for the data collection and reporting. Our data collection plans are designed to provide timely data for the evaluation reports, including:

- *Proof of Concept Demonstration (2011) Reports*:
  Implementation report published December 31, 2011
  Congressional Status report due published March 30, 2011
  Final Evaluation Report published June 30, 2012
- *Full Demonstration (2012) Reports*:
  Congressional Status report published December 31, 2012
  Final Evaluation Report published June 30, 2012
  Final Comprehensive Report published October 15, 2013

Exhibit A.4: Schedule of Tasks and Deliverables

Task	Activity/Deliverable	Begin Date	End Date	Deliverable Date
2.0	**Finalize Proposed Research Design/OMB**	**12/1/2010**	**3/14/2011**	
	Conduct pretest	1/3/2011	1/14/2011	
	Obtain Office of Management and Budget (OMB) Clearance	11/1/2010	4/19/2011	
	Obtain IRB approval	1/10/2011	2/20/2011	
4.A.1.a	Grantees develop household lists of eligible households and obtain consent	1/4/2011	3/30/2011	
4.A.1.b	Implement random assignment and notify families	3/1/2011	4/1/2011	4/1/2011
4.A.3	Conduct baseline household surveys	4/20/2011	6/25/2011	
4.A.4	Conduct follow-up household surveys	6/1/2011	9/2/2011	
4.A.5	Collect EBT transaction data	4/15/2011	10/15/2011	
4.A.6	Collect Implementation Study data*	1/4/2011	7/30/2011	
4.A.7	Conduct in-depth interviews with EBT processors	4/20/2011	9/30/2011	
4.A.8	Collect cost study data	1/4/2011	9/30/2011	
4.B	**Analyze 2011 Data**	**6/30/2011**	**11/30/2011**	
4.B.2	Conduct impact analysis	7/15/2011	12/30/2011	
4.B.3	Conduct implementation analysis	4/8/2011	10/30/2011	
4.B.4	Conduct cost analysis	4/8/2011	10/30/2011	
4.B.5	Analyze EBT transaction data	10/1/2011	11/30/2011	
5.0	**Reports and Briefings**	**4/30/2011**	**10/10/2012**	
5.2	Final Implementation Report	6/14/2011	6/30/2011	6/30/2011
5.3	Assessment of Data Collection Approach and Methods	9/1/3011	10/30/2011	10/30/2011
5.5	Final Congressional Status Report	9/22/2011	10/8/2011	10/8/2011
5.8	Final Evaluation Report on 2011 SEBT for Children Demonstrations	3/15/2012	3/30/2012	3/30/2012
5.9.a	Annual briefing 1	7/1/2012	7/15/2012	7/15/2012
5.9.b	Annual briefing 2	10/8/2011	10/30/2011	10/30/2011
6.0	**2011 Documentation**	**11/1/2011**	**12/31/2011**	
6.4	Data files and documentation for Final Evaluation Report	3/30/2012	3/30/2012	3/30/2012
6.5	2011 Public Use Files	5/14/2012	5/29/2012	5/29/2012
7.0	**Revise Approach**	**10/1/2011**	**12/31/2012**	
7.1	Revised Research Design – 2012 Update	10/1/2011	10/30/2011	10/30/2011
7.2	Report on Site Selection of Additional SEBT for Children Demonstrations	6/1/2011	6/30/2011	6/30/2011
7.3	Revised 2012 Data Collection/Analysis Plan	10/1/2011	10/30/2011	10/30/2011

Task	Activity/Deliverable	Begin Date	End Date	Deliverable Date
8.A	**Collect 2012 Data**	**11/1/2011**	**10/30/2012**	
8.A.1.a	Grantees develop household lists of eligible households and obtain consent	11/1/2011	1/29/2012	
8.A.1.b	Implement random assignment and notify families	1/29/2012	3/30/2012	
8.A.3	Conduct baseline household surveys	2/19/2012	4/29/2012	
8.A.4	Conduct follow-up household surveys	6/1/2012	9/2/2012	
8.A.5	Collect EBT transaction data	4/15/2012	10/15/2012	
8.A.6	Collect implementation study data	11/1/2011	9/30/2012	
8.A.7	Conduct in-depth interviews with EBT processors	4/15/2012	9/30/2012	
8.A.8	Collect cost study data	11/1/2011	9/30/2012	
8.B	**Analyze 2012 data**	**6/30/2012**	**9/30/2012**	
8.B.2	Impact analysis	10/1/2012	12/30/2012	
8.B.3	Implementation and cost analysis	4/8/2012	10/30/2012	
8.B.4	Analyze EBT data	10/2/2012	11/30/2012	
9.0	**2012 Demonstration Reports**	**7/30/2012**	**4/15/2013**	
9.2	Final Congressional Status Report	9/8/2012	10/8/2012	10/8/2012
9.5	Final Evaluation Report on 2012 SEBT for Children Demonstrations	3/15/2013	3/30/2013	3/30/2013
9.6	Annual presentations			
9.7.a	Annual briefing 1	9/15/2012	10/10/2012	10/10/2012
9.7.b	Annual briefing 2	3/30/2013	4/15/2013	4/15/2013
10.0	**2012 Data Files and Codebooks**	**11/15/2012**	**7/15/2013**	
10.1.c	Data files and documentation for Final Evaluation Report	5/14/2013	3/30/2013	3/30/2013
10.2	2012 public use files	5/29/2013	7/15/2013	7/15/2013
11.0	**Comprehensive SEBT Report, Journal Supplement & Presentation**	**1/30/2013**	**10/30/2013**	
11.1–11.5	*Comprehensive SEBT for Children Process and Impact Evaluation Report*	*1/30/2013*	*6/30/2013*	
11.4	Revised report	4/30/2013	5/30/2013	5/30/2013
11.5	Final report	6/15/2013	6/30/2013	6/30/2013
11.6-11.7	*Journal supplement*	*7/1/2013*	*6/30/2014*	
11.8	Presentation on final results	6/15/2014	7/1/2014	7/1/2014
11.9a	Executive briefing	6/15/2013	7/1/2013	7/1/2013
11.9b	FNS staff briefing	6/15/2013	7/1/2013	7/1/2013
12.0	**Final Documentation**	**4/1/2013**	**7/30/2013**	
12.1	Final data files and code books	5/29/2013	7/30/2013	7/30/2013
12.1.c	Data files and documentation for Final Report	6/15/2013	6/30/2013	6/30/2013
12.2	Final public use files	5/29/2013	7/30/2013	7/30/2013

*Documentation of random assignment process, etc., will be collected for implementation study. First set of interviews can only occur after OMB clearance has been obtained, which would be 4/20/2011.

Analysis Plan

The main lines of analysis follow the broad research categories outlined in section A.1. Each of the research questions within these categories is explicitly or implicitly associated with one or more outcome measures to be analyzed. Our approach, including data sources for each question and the planned analyses are summarized in Exhibit A.1, above.

Analysis Methods

Tabulations and cross-tabulations: The descriptive research questions will be addressed by tabulations or cross-tabulations. For example, simple tabulations will be used to characterize children that applied for SEBT for Children. Cross-tabulations will be used to examine outcomes by site characteristics, and to compare groups, for example to characterize children who participate in the SEBT for Children and SFSP to children who participate only in the SEBT for Children.

Econometric models: The main impacts of the SEBT for Children on child outcomes will be estimated through multivariate econometric modeling described in Section B. Impacts will be estimated at the site-level, pooled by type of demonstration (SEBT for Children-WIC approach; SEBT for Children-SNAP approach or SEBT for Children-SNAP Hybrid approach), and pooled for all demonstrations. In addition, impacts will be estimated for important subgroups, such as SNAP participants or children in households with low food security using the pooled data.

The econometric models will be used to estimate the impact of the program on Very Low Food Security (VLFS). We will then apply these models to broader measures of food insecurity (LFS vs. VLFS) and measures of nutritional status (e.g., eating breakfast, eating healthful foods). Finally, we will apply these models to other outcomes (awareness of the SFSP, food expenditures, participation in other programs, strategies to get food over the summer). Where we have measures both in the spring and the summer, we will apply these models both using summer outcomes as the outcome (with spring outcomes as regression controls) and also using the change between spring and summer as the outcome (sometimes with spring outcomes as a control). Furthermore, we will apply these models both in the POC year (though MDDs are large) and then again in the demonstration year. The models will first be estimated separately for each demonstration site. The advantage of estimating the model separately for each site is that the implementation of SEBT for Children benefits is homogeneous; the disadvantage is that site-by-site models will have relatively large MDDs because of the small sample size in each site. To reduce the MDDs, the models will then be estimated using data pooled across the demonstration sites (with appropriate variables included to account for differences among sites).

Publication of Study Results

The study's findings will be represented in three reports and a journal supplement which will undergo peer review. The projected dates for these reports are presented in Exhibit A.4 (above).

A.17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

All data collection instruments for the Food and Nutrition Service Evaluation of the Summer Electronic Benefits for Children Demonstration Projects will display the OMB approval number and expiration date.

A.18 Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

There are no exceptions to the Certification for Paperwork Reduction Act (5 CFR 1320.9) for this study.

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