

SUPPORTING STATEMENT PART A FOR

Evaluation of the Food Insecurity Nutrition Incentives (FINI)

**Office of Research and Analysis
Food and Nutrition Service
US Department of Agriculture
3101 Park Center Drive
Alexandria, VA 22302
Phone: 703-305-2640
Fax: 703-305-2576
E-mail: Eric.Williams@fns.usda.gov**

Table of Contents

<u>Section</u>		<u>Page</u>
A	Justification.....	1
A.1	Circumstances Making the Collection of Information Necessary.....	1
A.2	Purpose and Use of the Information.....	2
A.3	Use of Information Technology and Burden Reduction.....	8
A.4	Efforts to Identify Duplication and Use of Similar Information.....	9
A.5	Impact on Small Businesses or Other Small Entities.....	9
A.6	Consequences of Collecting the Information Less Frequently.....	10
A.7	Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....	10
A.8	Responses to the <i>Federal Register</i> Notice and Efforts to Contact Outside Agencies.....	11
	<i>Federal Register</i> Notice and Comments.....	11
	Consultations Outside the Agency.....	11
A.9	Explanation of Any Payment or Gift to Respondents.....	12
A.10	Assurance of Confidentiality Provided to Respondents.....	17
A.11	Justification for Sensitive Questions.....	18
A.12	Estimates of Respondent Burden Including Annualized Hourly Costs.....	18
A.13	Estimates of Other Total Annualized Cost Burden.....	27
A.14	Annualized Cost to the Federal Government.....	27

A.15	Explanation for Program Changes or Adjustments.....	26
A.16	Plans for Tabulation and Publication and Project Time Schedule.....	28
A.17	Reason Display of OMB Expiration Date Is Inappropriate.....	30
A.18	Exceptions to Certification for Paperwork Reduction Act Submissions.....	30

Tables

A.9.1	Response Outcomes Varying the Pre-paid (initial) and Survey Completion (Post) Incentive Amounts.....	16
A.12.1	Respondent burden and cost estimate.....	21
A.16.1	Data collection and reporting schedule.....	29

**Contents
(continued)**

Appendixes

A	Authorizing Legislation
B.1	FINI RFA – 2015
B.2	FINI RFA – 2016
C	Evaluation of Food Insecurity Nutrition Incentives : Statement of Objectives
D.1	Pre-SNAP Participant Survey Invitation letter – English
D.2	Pre-SNAP Participant Survey Invitation letter – Spanish

- E.1 Pre-SNAP Participant Survey – English
- E.2 Pre-SNAP Participant Survey – Spanish
- E.3 Pre-SNAP Participant Web Survey Screenshots – English
- E.4 Pre-SNAP Participant Web Survey Screenshots – English
- F.1 SNAP Participant Survey Reminder Postcard 1 – English
- F.2 SNAP Participant Survey Reminder Postcard 1 – Spanish
- G.1 Pre-SNAP Participant Survey Reminder letter 1 – English
- G.2 Pre-SNAP Participant Survey Reminder letter 1 – Spanish
- H.1 SNAP Participant Survey Reminder Postcard 2 – English
- H.2 SNAP Participant Survey Reminder Postcard 2 – Spanish
- I.1 Pre-SNAP Participant Survey Reminder letter 2 – English
- I.2 Pre-SNAP Participant Survey Reminder letter 2 – Spanish
- J.1 SNAP Participant Survey Telephone interview script – English

J.2 SNAP Participant Survey Telephone interview script
– Spanish

**Contents
(continued)**

Appendixes

K.1 SNAP Participant Survey Voicemail/Text Message
Reminder for Telephone Survey – English

K.2 Voicemail/Text Message for Telephone Survey –
Spanish

L.1 Pre- SNAP Participant Survey Thank you letter –
English

L.2 Pre- SNAP Participant Survey Thank you letter –
Spanish

M.1 Post-SNAP Participant Survey Invitation letter –
English

M.2 Post-SNAP Participant Survey Invitation letter –
Spanish

N.1 Post-SNAP Participant Survey Treatment Group –
English

N.2 Post-SNAP Participant Survey Treatment Group –
Spanish

O.1 Post-SNAP Participant Survey Comparison Group –
English

O.2 Post-SNAP Participant Survey Comparison Group –
Spanish

- P.1 Post-SNAP Participant Survey Reminder letter 1 – English
- P.2 Post-SNAP Participant Survey Reminder letter 1 – Spanish
- Q.1 Post-SNAP Participant Survey Reminder letter 2 – English
- Q.2 Post-SNAP Participant Survey Reminder letter 2 – Spanish
- R.1 Post-SNAP Participant Survey Thank you letter – English
- R.2 Post-SNAP Participant Survey Thank you letter – Spanish
- S SNAP Participant Key Informant Interview Invitation Letter – English only
- T SNAP Participant Key Informant Interview Recruitment Script – English only
- U SNAP Participant Key Informant Interview Confirmation Letter – English only

**Contents
(continued)**

Appendixes

- V SNAP Participant Key Informant Interview Discussion Guide – English only

W	SNAP Participant Key Informant Interview Thank you letter – English only
X.1	Grantee Email Request for Submission of FINI outlet characteristics form
X.2	FINI Outlet characteristics form
Y.1	Grantee Administrator Interview Scheduling Script – English only
Y.2	Grantee Administrator Interview Discussion Guide – English only
Z	Grantee Administrator Pre Intervention- Thank you card – English only
AA	Grantee Administrator Post Intervention- Thank you card – English only
AB	Quarterly Core Program Data Form Email – English only
AC	Annual Core Program Data Form Email – English only
AD.1	Quarterly Core Program Data Form – English only
AD.2	Quarterly Core Program Data Web Form Screenshots – English only
AE.1	Annual Core Program Data Form – English only
AE.2	Annual Core Program Data Web Form Screenshots – English only
AF	Outlet Survey Invitation Letter – English only
AG.1	Outlet Survey: Farmers Market – English only

Appendixes

AG.2	Outlet Survey: Grocery Stores, CSAs, Farm Stands – English only
AH	Outlet Survey Reminder Letter – English only
AI	Outlet Survey Email to Grantees – English only
AJ	Outlet Survey Thank you Letter – English only
AK.1	60-Day Federal Register Notice: Comments – 1
AK.2	60-Day Federal Register Notice: Comments - 2
AK.3	60-Day Federal Register Notice: Action Taken – 1
AK.4	60-Day Federal Register Notice: Action Taken - 2
AL.1	NASS comments
AL.2	NASS comments and Westat responses
AM	Confidentiality/Non-disclosure agreement
AN	IRB approval letter
AO	Pretest protocol for 2 items in SNAP Participant Survey
AP	Pretest protocol for Outlet Survey
AQ.1	Email to State SNAP agencies to schedule a discussion call for obtaining SNAP administrative data

- AQ.2 State Agency Telephone Discussion Schedule
Confirmation Email
- AQ.3 State Agency Discussion Guide
- AQ.4 Email to State Agency: Variables and Timeline to
secure SNAP administrative data files

Part A. Justification

A.1 Circumstances Making the Collection of Information Necessary

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

This is a new information collection request. The **Food Insecurity Nutrition Incentive** (FINI) Grants Program is authorized by Section 4208 of the Agricultural Act of 2014 (P.L. 113-79), which amends Section 4405 of the Food, Conservation, and Energy Act of 2008 (“FCEA”) (7 U.S.C. 7517) [see Appendix A for authorizing legislation]. Section 4208 directs the Secretary of Agriculture of the U.S. Department of Agriculture (USDA) to implement and independently evaluate the FINI Grants Program [see Appendix B.1 and B.2 for the FINI Request for Applications released in 2014 and 2015, respectively]. The FINI program is administered by the National Institute of Food and Agriculture (NIFA). The Food and Nutrition Service (FNS) is directing the evaluation.

As stated in the Statement of Objectives for the FINI independent evaluation [Appendix C], FINI grants will be awarded over four cycles: 2014-2015, 2016, 2017, and 2018. Three types of projects are funded: (1) FINI Pilot Projects, not to exceed \$100,000 and 1 year; (2) FINI Community-Based Projects, not to exceed \$500,000 and 4 years; and (3) FINI Large-Scale Projects, \$500,000 or over and not to exceed 4 years. Eligibility to receive FINI grants is limited to non-Federal Government agencies and nonprofit organizations, including emergency feeding organizations; agricultural cooperatives; producer networks or associations; community health organizations; public benefit corporations; economic development corporations; farmers markets; community supported agriculture programs; buying clubs; Supplemental Nutrition Assistance Program (SNAP)-authorized retailers; and state, local, or tribal agencies.

As directed by Section 4208, the independent evaluation will measure the impact of FINI on (1) improving the nutrition and health status of participating households receiving incentives and (2) increasing fruit and vegetable purchases in participating households. The focus of the independent evaluation is on the Community-Based and Large-Scale Projects awarded in fiscal years 2014-2015 and 2016. The 2014-2015 grantees include seven Community-Based Projects and eight Large-Scale Projects. The 2016 FINI grantees are expected to be selected in April 2016; for planning purposes, we estimate that there will be 20 Community-Based and Large-Scale Projects.

The proposed independent evaluation will provide information on implementation of FINI projects, consumer awareness and acceptance of these projects, and the effect of these programs on fruit and vegetable purchase and consumption. The findings will expand the evidence base on the effectiveness of incentive programs and provide policymakers in USDA and Congress with credible information on which interventions work best.

A.2 Purpose and Use of the Information

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

The data collection described in this document is necessary for meeting the congressional mandate for an independent evaluation of the FINI grant program. A preliminary report, interim report, and a final report detailing the study findings will be produced. There is currently no other effort that can address the research objectives of the proposed study.

- **Recruitment of SNAP Participants:** Local and State SNAP agency officers will be contacted after the grant award, to obtain the SNAP case files necessary to develop the sampling frame of SNAP participants in the intervention and comparison groups. SNAP participants in the intervention and comparison groups will be asked to complete the pre-

SPS (before the incentive program is implemented) and post-SPS (6 months after the incentive program is initiated) SNAP Participant Survey. Program implementers will be interviewed twice; at approximately 18 months and 30 months after the program start date. Retail operators will be asked to respond to the Outlet Survey once. Finally, grantees will provide Core Program Data on a quarterly basis. This data collection design is necessary to capture the early and late-onset changes in program implementation as well as consumer purchase and consumption behaviors.

The proposed study evaluation involves data collection from (Individuals/Households) SNAP participants and (Business for-not-for-profit) FINI grantees, including program administrators and retailers. The research objectives of this evaluation¹ are to:

- Document each nutrition incentive program by describing its design and operations to identify (i) barriers and facilitators to implementation and (ii) specific lessons learned to support replication of successful program;
- Assess the effectiveness of each Multiyear FINI Project and Multiyear FINI Large-Scale Project in increasing fruit and vegetable purchases and consumption among SNAP participants; and
- Compare the relative outcomes of different forms of incentives to help determine the most effective and efficient strategies for using incentives to increase purchase and consumption of fruits and vegetables among SNAP participants.

There are four categories of individuals from/about whom we will collect data: State SNAP agency staff, SNAP participants, FINI grantees, and retail operators.

- **State/Local SNAP Agency Staff.** We will request SNAP administrative caseload files from State agencies; these files will be used to build the sampling frame of SNAP participants (described below).

¹These research objectives are as stated in the Statement of Work released for the Evaluation of Food Insecurity Nutrition Incentives.

An introductory email will be sent to all States that have at least 5 FINI outlets² [Appendix AQ.1], with a follow-up email to confirm the discussion time [Appendix AQ.2].

We will conduct a telephone discussion with the State agency staff [Appendix AQ.3] to discuss the need for SNAP administrative data files, timeframe, and best way to receive these data files (e.g., secure FTP server or encrypted email).

After the telephone discussion, we will send an email listing the variables, date range for the data, and date when data should be provided for sampling purpose [Appendix AQ.4]

- **SNAP Participants.** Two data collection activities—surveys and key informant interviews—are planned for SNAP participants. SNAP participant surveys will be conducted in English and Spanish; key informant interviews will be conducted in English. The SNAP Participant surveys were developed using items from previously validated surveys of SNAP participants. Two survey items were pre-tested with SNAP shoppers at farmers markets and the item wording was revised accordingly [Appendix AO].
 - **Surveys.** Surveys will be administered to SNAP participants in the intervention and comparison groups asking questions about their shopping patterns, knowledge and attitudes about fruits and vegetables, fruit and vegetable intake, household characteristics, and their experience with the incentive programs.

Two rounds of the SNAP Participant Survey (SPS) will be administered in English and Spanish—a pre-intervention survey [Appendixes E1 and D2] and a 6-month post-intervention survey [see Appendixes N2 and N2 for treatment group SPS and Appendixes O1 and O2 for comparison group surveys]. Data collection procedures will be the same for the pre- and post-intervention surveys, as detailed below and illustrated in Figure 1.

² We will not set a minimum threshold for number of outlets for grantees that operate FINI in only one State. This will ensure that all grantees have the potential to be represented in the national evaluation.

To gather data prior to incentive program implementation, we will identify the SNAP participants several months before the Pre-SNAP Participant Survey (SPS) data collection. We will work with the State SNAP office to obtain SNAP case files under OMB number 0584-0064 titled SNAP Forms, Applications and Periodic Reporting Notice (expiration 4/30/2016) and select participants from the intervention and comparison areas [Appendixes AQ.1 to AQ.4 contain the emails and discussion guide to discuss the need and protocol to obtain SNAP administrative files].

At the onset of the study, a packet will be mailed to participants containing an invitation letter [Appendixes D.1 and D.2], a \$2 pre-incentive,³ a URL and PIN number to access the Pre-SPS via the web [Appendix E.3 & E.4], and a \$20 cash incentive offer for completing the survey. The URL will be setup and the online survey will be developed after OMB approval.

One week after the initial mailing, participants who have not completed the web survey will receive a postcard [Appendixes F.1 and F.2] reminding them to complete the pre-SPS. Next, three weeks after the initial mailing, a first reminder mailing will be sent to nonrespondents, to underscore the importance of the study. The mailing will include a reminder letter [Appendixes G.1 and G.2], a Teleform – hard copy of the survey [Appendixes E.1 and E.2], and a postage paid return envelope.

One week after the first reminder mailing, all non-responding participants will receive a reminder postcard [Appendixes H.1 and H.2].

About three weeks after the first reminder letter mailing, a second reminder package containing a reminder letter [Appendixes I.1 and I.2], Teleform survey and a postage paid return envelope will be mailed to nonrespondents.

³Our experience from previous studies, including the Nutrition Assistance in Farmers Markets: Understanding Shopping Patterns of SNAP Participants study indicates that a small noncontingent incentive has a positive effect on response rates. Further discussion of this topic is provided in Section A.9.

Finally, if response rates are low in specific cells, targeted telephone interviews will be conducted to obtain the necessary survey completion count [Appendixes J.1 and J.2]; voicemail or text message reminders will be left in instances where we are unable to reach the sampled individual [Appendixes K.1 and K.2].

A thank you letter [Appendixes L.1 and L.2] with a \$20 cash incentive will be mailed to participants completing the survey. The post-SPS invitation letter [Appendix M] will be sent to all SNAP participants who completed the pre-SPS. All post-SPS related communication materials are included in Appendixes M.1 through R.2.

- **Semi-Structured Telephone Interviews.** Using the response to the post-SPS question “Would you be willing to participate in a telephone survey?,” we will select 60 SNAP participants who agreed to a telephone interview. All semi-structured telephone interviews will be conducted in English.

We will mail invitation letters to the sampled participants [Appendix S] and follow up by telephone [Appendix T] and schedule a time for the telephone interview.

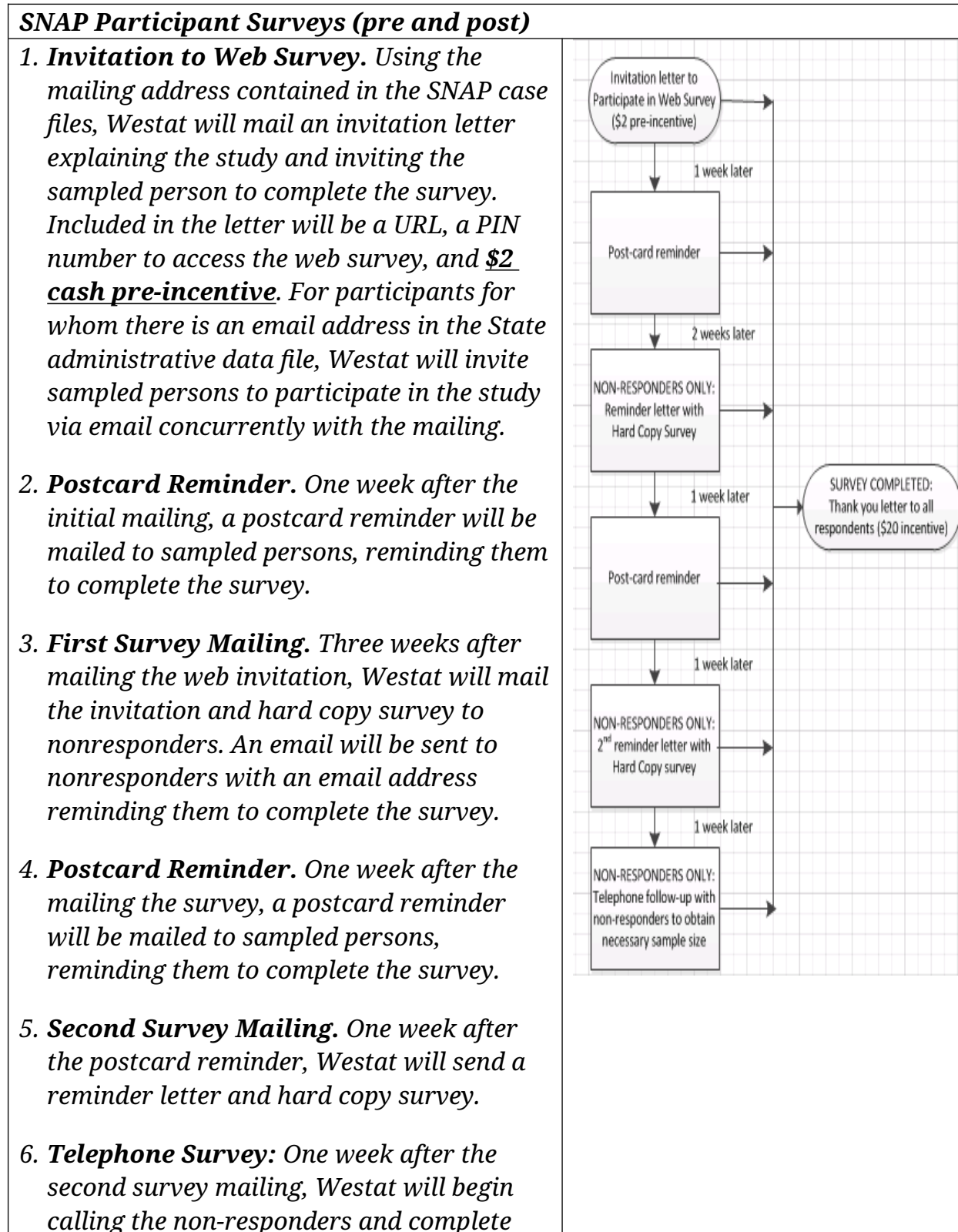
Immediately after the interviews are scheduled, a confirmation letter specifying the time for the scheduled interview will be sent to those who agreed to participate [Appendix U].

We will schedule interviews with 50 SNAP participants to ensure that we complete 40 interviews.⁴ On the designated day, an interviewer will conduct the semi-structured interviews. The interviews will begin with an overview of the project and the goals of the discussion, followed by verbal informed consent and permission to audiotape the session [Appendix V].

⁴We plan to schedule 50 interviews in the event of cancellations. In the event that we complete 40 interviews, we will cancel the remaining interviews and provide SNAP participants with whom interviews were scheduled (excluding no-shows) with the incentive, to thank them for being available for the interview.

We will mail a thank you letter and a \$25 cash incentive to SNAP participants who complete the interviews [Appendix W]. All key informant interviews will be conducted in English.

Figure 1. Fielding Procedures for SNAP Participant Surveys



the survey by telephone.

7. Mail Thank You Letters. *For those who completed the survey on the web, by mail, or over the telephone, Westat will send a thank you letter with **\$20 cash incentive**.*

- **FINI Grantees (Key Informants).** Grantees will participate in three data collection efforts: submission of outlet characteristics form, key informant interviews and submission of Core Program Data. All Grantee interviews will be conducted in English and all grantee emails and forms will also be in English.
 - **Submission of FINI outlet characteristics form:** All large scale and multi-year grantees will provide basic information about their outlet, such as type (farmers market/farm stand, grocery store, etc.), incentive structure, FINI operation structure (year round/seasonal), and months FINI incentive will be offered in 2017. We will send an email [Appendix X.1] and a form [Appendix X.2] to obtain this information from the grantees. This information will be used to sample SNAP participants to participate in the SNAP Participant Survey.
 - **Key Informant Interviews.** Grantees will identify a program administrator to participate in two interviews—one in Year 2 of the intervention, and one in Year 3 of the intervention. The interview procedures will be the same for the two interviews.

Telephone interviews will be scheduled with these stakeholders [Appendix Y.1]. At the scheduled time, telephone interviewers will conduct a semi-structured interview, using the interview guide [Appendix Y.2]; all interviews will be audio-recorded.

A thank you postcard will be mailed to all grantees who participated in the pre-intervention and the post-intervention interviews [Appendixes Z and AA respectively]. Grantees participating in the key informant interviews will not receive any

incentives; this is in keeping with the terms of the grants award, which specify that grantees are expected to cooperate with and contribute to the independent evaluation in its entirety.

- **Submission of Core Program Data.** As a part of the grant award, all grantees are expected to provide quarterly program data.

To obtain this information, all grantees will be emailed on a quarterly basis [Appendix AB], with a request to complete online Quarterly Core Program Data forms [see Appendix AD.1 for the Quarterly Core Program Data Form and Appendix AD.1 for illustrative Quarterly Core Program Data Web Form Screenshots].

At the end of each award year, a separate email [Appendix AC] will be sent to all grantees, requesting completion of the Annual Core Program Data form [see Appendix AE for the Annual Core Program Data Form and Appendix AE.1 for illustrative screenshots].

The emails to complete the quarterly and annual Core Program Data forms will contain a link to the online forms. As indicated in the program staff section above, 100 percent participation is expected for all grantees. Grantees are expected to cooperate with and contribute to the independent evaluation. Therefore, grantees will not be paid for their participation in this study. However, they may receive a summary data report about their FINI program.

- **Retail Operators.** The Outlet Survey will provide the FINI operators' perspectives on implementing and operating the incentive program. The Outlet Survey will be mailed to all participating outlets.

We will mail an invitation letter [Appendix AF] and the hardcopy survey to all operating outlets, including all farmers markets [Appendix AG.1] and grocery stores, CSAs and farm stands [Appendix AG.2].⁵

⁵Separate surveys will be provided to farmers markets and grocery stores, CSAs and farm stands because farmers markets are composed of multiple vendors, while grocery stores, CSAs and farm stands are single vendor retailers. Providing separate surveys will allow us to capture differences in incentive mechanism delivery due retail structure differences.

Two weeks after the invitation letter mailing, we will mail a reminder postcard to nonresponding outlet operators [Appendix AH]. The reminder postcard will include a toll-free number to call to request another copy of the survey in the event they have lost or misplaced the survey included in the invitation letter mailing.

Five weeks after the invitation letter mailing, we will send an email [Appendix AI] to grantees that will provide a list of nonresponding outlets and ask them to follow up with the outlet operator to complete the survey.

A thank you letter will be send to all responding retail operators [Appendix AJ].

A.3 Use of Information Technology and Burden Reduction

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

FNS is committed to compliance with the E-Government Act, 2002. This study offers technology-based options to SNAP Participants invited to complete the SPS, to ease the burden of participating in the study. We expect 15 percent of the SNAP participants to complete the SPS online. In addition, 100 percent of all FINI grantees will submit all annual and quarterly Core Program Data using the online form.

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

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

To our knowledge, there is no similar information already available or being collected for the study's timeframe that can be used to independently evaluate this congressionally mandated grant program. Every effort has been made to avoid duplication. The data requirements for the study have been carefully reviewed to determine whether the needed information is already available. In our review, we identified several studies examining the impact of incentives on fruit and vegetable consumption among SNAP participants. The largest and most rigorous study was the Healthy Incentives Pilot⁶ funded by USDA and conducted in one county in Massachusetts. The current survey is designed to gather process data for large-scale and community-based FINI grantees and outcome data from a sample of SNAP participants in the intervention and comparison groups. This study will combine the data from SNAP Participant Surveys, Outlet Surveys, and key informant interviews with SNAP participants and grantees, providing valuable information on how FINI interventions were delivered and their associated outcomes.

A.5 Impact on Small Businesses or Other Small Entities

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

Many of the outlets selected for the evaluation will be small businesses or other small entities, and will provide information on the administration of the incentives. All efforts will be made to minimize burden. As with the other

⁶Bartlett, S., Klerman, J., Wilde, P., Ohlso, L., Logan, C., Blockin, M., Beauregard, M., and Enver, A. (2014). Evaluation of the Healthy Incentives Pilot (HIP) Final Report. Alexandria, VA: Food and Nutrition Service, USDA.

respondents, the information being collected from small businesses will be kept to the minimum needed for the congressional-mandated evaluation.

We estimate 3600 participating FINI outlets; of these approximately 85 percent are expected to be small business for a total of 3060.⁷

A.6 Consequences of Collecting the Information Less Frequently

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

This is a one-time data collection activity. FINI grantees are expected to conduct their own process and outcome evaluations. The independent, rigorous evaluation provides an opportunity to collect standardized data across all grantees and to use consistent measures to compare implementation processes and outcomes. Some outlets such as farmers markets may be seasonal and operate for part of the year. The request for clearance is to conduct data collection during a specific time for each cycle of grantee awards. If this information collection is not conducted, USDA/FNS will not have consistent data across all incentive programs to identify the best intervention strategies to promote and improve fruit and vegetable purchase and consumption in SNAP households.

A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

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

⁷ Assuming a similar count and breakdown of FINI outlets among 2015 and 2016 grantees, we estimate 85 percent of the outlets to be farmers markets, farm stands, mobile markets, and CSAs. These outlet types are considered small business. The remaining 15 percent include traditional and local grocery stores and are considered medium to large business.

- Requiring respondents to report information to the agency more often than quarterly;
- Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- Requiring respondents to submit more than an original and two copies of any document;
- Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than 3 years;
- In connection with a statistical surveys, 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 special circumstances relating to the guidelines of 5 CFR 1320.5. This request fully complies with 5 CFR 1320.5

A.8 Responses to the *Federal Register* Notice and Efforts to Contact Outside Agencies

If applicable, identify the date and page number of publication in the *Federal Register* of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public

comments received in response to that notice and describe actions taken by the agency in response to these comments.

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

Federal Register Notice and Comments

FNS published a notice on September 10, 2015 in the *Federal Register*, Volume 80, Number 175, pages 54512-54517 and provided a 60-day period for public comments. FNS received two comments; Appendix AK.1 and Appendix AK.2 includes the comments and Appendix AK.3 and AK.4 includes FNS' responses.

Consultations Outside the Agency

The information collection request has been reviewed by the National Agricultural Statistics Service (NASS) of USDA with special reference to the statistical procedures [Appendix AL]. FNS also consulted with Michelle Ver Ploeg [Email: SVERPLOEG@ers.usda.gov; Phone: 202-694-5372] from the Economic Research Service and Jane Clary [Email: jclary@nifa.usda.gov; Phone: 202-720-3891] from the National Institute of Food and Agriculture.

A.9 Explanation of Any Payment or Gift to Respondents

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

Providing survey participants with a monetary incentive reduces non-response bias and improves survey representativeness, especially in populations defined

as being in poverty.^{8,9,10,11 12} Additionally, incentives improve survey response rates and therefore the numbers of surveys completed. Having an adequate number of completed surveys is essential to detect statistically significant differences between subpopulations in the impact of the intervention. Incentives are an essential component of the multi-pronged approaches used to minimize non-response bias, especially in longitudinal studies with hard-to-reach, low-income households such as those with children, elderly, and those residing in rural areas; receiving federal nutrition assistance benefits;¹³ reduce efforts to locate hard-to-reach study participants; and lower overall survey costs and time to achieve completion rates without affecting data quality^{14,15}.

The Food and Nutrition Service (FNS) is requesting the use of pre-paid (pre-survey) and post-participation (survey completion) cash incentives to increase survey response rates, gain efficiency in data collection, and most importantly to reduce non-response bias. The incentives for survey participants are necessary for recruiting and retaining participants for the longitudinal study involving baseline and follow-up data collection six months apart. The baseline data collection for this evaluation must be completed in a compressed window between February and April 2017 prior to the start of the farmers' market season

⁸ Singer E. (2002). The use of incentives to reduce non response in households surveys in: Groves R, Dillman D, Eltinge J, Little R (eds.) *Survey Non Response*. New York: Wiley, pp 163-177.

⁹ James T. (1996). Results of wave 1 incentive experiment in the 1996 survey of income and program participation. *Proceedings of the Survey Research Section, American Statistical Association.*, 834-839.

¹⁰ Groves R, Fowler F, Couper M, Lepkowski J, Singer E. (2009) in: *Survey methodology*. John Wiley & Sons, pp 205-206.

¹¹ Singer E. (2002).

¹² Singer E and Ye C. (2013). The use and effectiveness of incentives in surveys. *Annals of the American Academy of Political and Social Science*, 645(1):112-141.

¹³ Bonevski B, Randell M, Paul C, Chapman K, Twyman L, Bryant J, Brozek K, Hughes, C. (2014) Reaching the hard-to-reach: a systematic review of strategies for improving health and medical research with socially disadvantaged groups. *BMC Medical Research Methodology* 14:42, 14-42. <http://bmcmedresmethodol.biomedcentral.com/articles/10.1186/1471-2288-14-42>

¹⁴ Dillman, Don. 2000. *Mail and Internet Surveys: The Tailored Design Method, 2nd Edition*. John Wiley & Sons: New York.

¹⁵ Singer, Eleanor. 2006. "Introduction: Nonresponse Bias in Household Surveys," *Public Opinion Quarterly*. 70(5): 637-645.

and the launch of FINI intervention at supermarkets. Seasonal farmers markets typically operate from May to December and participating supermarkets are scheduled to start offering incentives as early as May 2017. The survey incentive is also important for improving response rates and addressing non-response bias for the follow-up survey. Based on the empirical evidence summarized below, SNAP participants in the FINI national evaluation will receive a pre-survey incentive of \$2 with the invitation letter and post-participation/survey completion incentives of \$20 each after completing the baseline and the follow-up surveys. SNAP participants selected to participate in the key informant interviews will also receive \$25 after completing the telephone interview.

Since grantees are required to cooperate with and contribute to the independent evaluation, grantees and outlet staff will not receive any incentives for their participation in this study.

Survey Incentives Improve Sample Representativeness

Survey incentives can improve sample representativeness. Incentives encourage those less interested in research to participate,¹⁶ including low-income respondents,¹⁷ thereby reducing non-response bias.^{18,19} Several studies provide evidence that offering incentives may improve representation for low-education, low-income, and ethnic minority subgroups. For example, Singer et al.²⁰ noted that a \$5 incentive paid in advance brought in a disproportionate number of low-education respondents into the sample. Another experiment,²¹ examining the impact of providing incentives to telephone survey non-respondents on sample

¹⁶ Groves RM, Couper MP, Presser S, Singer E, Tourangeau R, Acosta G, Nelson L. (2006) Experiments in Producing Nonresponse bias. *Public Opinion Quarterly*. 70(5): 720-736

¹⁷ Singer, E., and R.A. Kulka. "Paying Respondents for Survey Participation." In *Studies of Welfare Populations: Data Collection and Research Issues. Panel on Data and Methods for Measuring the Effects of Changes in Social Welfare Programs*, edited by Michele Ver Ploeg, Robert A. Moffitt, and Constance F. Citro. Committee on National Statistics, Division of Behavioral and Social Sciences and Education. Washington, DC: National Academy Press, 2002, pp. 105–128.

¹⁸ Groves, R., Singer, E., Corning, A. (2000). Leverage-saliency theory of survey participation: description and an illustration. *Public Opinion Quarterly*. 64(3): 299-308.

¹⁹ Messer B and Dillamn D (2011). Surveying the general public over the internet using address-based sampling and mail contact procedures. *Public Opinion Quarterly*, 75:429-457.

²⁰ Singer E, Van Hoewyk J, Maher MP. (2000). Experiments with incentives in telephone surveys. *Public Opinion Quarterly* 64:171-188.

composition and data quality in the New York Adult Tobacco Survey, found that offering an incentive to individuals who refused to participate in the survey led to increased proportion of respondents who were over age 55, did not have a college degree, and were not employed. Many of these subpopulations are represented in the SNAP universe.

None of the studies have examined how incentives mitigate non-response bias in surveys of SNAP participants. FNS is currently conducting two studies that include longitudinal surveys of SNAP-participants and are providing survey completion incentives to respondents. The two studies are:

- The USDA-FNS study Evaluation of Demonstration Projects to End Childhood Hunger OMB control number: 0584-0603, expiration date: 8/31/2018) includes a baseline and a follow-up survey each with an estimated 30 minutes of burden. For this study, a \$30 completion incentive was approved for the baseline survey, and a \$30 completion incentive was approved for the follow-up survey.
- The USDA- FNS study Evaluation of SNAP Employment and Training Pilots (OMB control number: 0584-0604, expiration date: 1/31/2019) involves surveying participants in the treatment and control groups after 12 months of participation and again after 36 months of participation. The estimated burden for the completion of each survey is about 30 minutes. A \$30 completion incentive has been approved for the completion of the 12 month follow-up survey and a \$ 40 incentive for the completion of the 36 month follow-up survey; there is no baseline survey.

Both studies noted above will conduct a robust non-response bias analysis as most research studies currently are not achieving the desired 80 percent survey response rate. These studies and FINI will contribute to the evidence-base.

- For this study (FINI) the estimated burden for completing the baseline and follow-up surveys is 20 minutes. A \$ 20 survey-completion incentive is

²¹ Currivan D (2005). The impact of providing incentives to initial telephone survey refusers on sample composition and data quality. Prepared for the American Association of Public Opinion Research Annual Meeting in Miami, 2005.

being requested for the baseline and the follow-up surveys. A non-response bias analysis is planned for FINI.

Survey incentive experiments in future studies could be used to determine whether incentives help mitigate non-response bias within SNAP participant subpopulations, and if so, what level of survey incentives are most effective.

Survey Incentives Improve Response Rates

Empirical evidence also supports the use of survey incentives to improve response rates in addition to reducing non-response bias. In a meta-analysis of 40 studies, Messer and Dillman²² reported findings of their experiments on response rates to multi-mode surveys and varying incentive amounts. Their findings demonstrated that offering a \$5 pre-incentive and implementing a web-mail design yielded significant increase in response rates. In a recently completed meta-analysis, Mercer and colleagues²³ reported a 10 percentage point increase in response rates for mail surveys when participants were paid a \$2 pre-paid incentives and 6 percentage point increase for phone surveys when participants were offered a \$20 post-incentive. Similarly, research indicates that post-paid incentives improves responses to mail and interviewer-administered surveys.^{10,11} For example, Cantor et al.²⁴ reported an effect of 9.1 percentage points when offering a post-incentive of \$20 (compared to no incentive).

The Food and Nutrition Service (FNS) study: *Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants (FMCS)*²⁵ (OMB Control Number: 0584-0564; Expiration Date: November 30, 2014) involved survey data collection from SNAP participants; the respondent burden was comparable to the proposed burden for the FINI national evaluation. The FMCS

²² Messer and Dillman, 2011.

²³ Mercer A, Caporaso A, Cantor D, Townsend R (2015). How much gets you how much? Monetary incentives and response rates in household surveys. *Public Opinion Quarterly*, 79:105-129.

²⁴ Cantor, David, Kevin Wang, and Natalie Abi-Habib. (2003). "Comparing Promised and Pre-Paid Incentives for an Extended Interview on a Random Digit Dial Survey." *Proceedings of the American Statistical Association, Survey Research Section*.

²⁵ Karakus, Mustafa, MacAllum, Keith, Milfort, Roline and Hao, Hongsheng. *Nutrition Assistance in Farmers Markets: Understanding the Shopping Patterns of SNAP Participants*. Prepared by Westat for the U.S. Department of Agriculture, Food and Nutrition Service, October, 2014.

included an incentive experiment to examine the impact of a differential incentive on survey completion rates among SNAP participants. In this study, SNAP participants were surveyed once (i.e there was no follow-up survey). The estimated burden for completing the survey was 25 minutes. Survey completion rates ranged from 42.5 to 48.9 percent, with the highest response rate for the \$5 initial (pre-paid or pre-survey) and \$20 post survey completion incentive group (Table A.9.1). Response rates were approximately 6 percentage points higher in the \$20 post survey completion incentive group than the \$10 post survey completion incentive group.

Table A.9.1. Response Outcomes Varying the Pre-paid (initial) and Survey Completion (Post) Incentive Amounts

	Overall		\$5 Initial / \$10 Post		\$5 Initial / \$20 Post		\$10 Initial / \$10 Post		\$10 Initial / \$20 Post	
	n	%	n	%	n	%	n	%	n	%
Complete	4,752	46.0%	1,098	42.5%	1,272	49.3%*	1,120	43.3%	1,262	48.9%*
Refusal	843	8.2%	236	9.1%	193	7.5%	220	8.5%	194	7.5%
Non-locatable	2,616	25.3%	683	26.4%	646	25.1%	690	26.7%	597	23.1%
Final non-response	2,118	20.5%	568	22.0%	467	18.1%	557	21.5%	526	20.4%
	10,329	100%	2,585	100%	2,578	100%	2,587	100%	2,579	100%

* Response rate for the two \$20 post groups combined significantly larger than for the two \$10 post groups combined (p < .01)

The USDA-FNS Study to Assess the Effect of SNAP Participation of Food Security in the post-American Recovery and Reinvestment (ARRA) Environment (OMB Control Number 0584-0563, Discontinued September 19, 2011) offered a \$2 pre-pay incentive and a \$20 post-pay each upon completing the telephone interviews and had a response rate of 56 percent for baseline and 67 percent for a six-month follow-up²⁶ The estimated burden was about 30 minutes for each survey. Similar incentive amounts are being requested for this study. Furthermore, the FMCS study has demonstrated that the \$20 incentive has a better outcome for response rates than the \$ 10 incentive.

Cash Incentives are Preferred to Other Forms for Low-Income Respondents

While the use of cash incentives is currently not the preferred method by OMB for increasing response rates, FNS believes that for this study population of low-income households, cash incentives are the most appropriate way to ensure high survey response rates and to provide reliable and generalizable results. Cash is better than checks as a medium for incentives for low-income populations²⁷ because many low-income households are unbanked. For instance, over a quarter of households with incomes of \$15,000 or less are unbanked.²⁸ If these

²⁶ Mabli, James, Jim Ohls, Lisa Dragoset, Laura Castner, and Betsy Santos. *Measuring the Effect of Supplemental Nutrition Assistance Program (SNAP) Participation on Food Security*. Prepared by Mathematica Policy Research for the U.S. Department of Agriculture, Food and Nutrition Service, August 2013.

²⁷ Groves et al., 2009.

²⁸ Federal Deposit Insurance Corporation (2014). *2013 FDIC National Survey of Unbanked and Underbanked Households*. Available at: https://www.economicinclusion.gov/surveys/2013household/documents/2013_FDIC_Unbanked_HH_Survey_Report.pdf.

households are to monetize their checks, they often must use check cashing services that often require customers to pay substantial service charges in order to cash a check.^{29,30} Cash incentives are also preferable to pre-paid gift cards as cash has shown to provide a higher response rate than prepaid vouchers³¹ or gift cards.³²

A.10 Assurance of Confidentiality Provided to Respondents

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

Study participants—i.e., SNAP participants, FINI grantees, and outlet operators—will be subject to assurances as provided by the Privacy Act of 1974 (5 USC Section 552a), which requires the safeguarding of individuals against invasion of privacy. The individuals participating in this study will be assured that the information they provide will not be published in a form that identifies them. Specifically, the invitation letter and telephone interview script will inform the participants that participation in the survey is voluntary; information provided in this survey or interview will be kept private to the extent required by law. Finally, they will also be informed that there is no penalty if they decide not to respond to the data collection as a whole or to any particular questions. No identifying information will be attached to any reports. Identifying information will not be included in the public use dataset. In addition, all Westat project staff

²⁹ Roger Swagler R, John Burton J and Joan Koonce Lewis J (1995). The Alternative Financial Sector: An Overview. *Advancing the Consumer Interest*. Vol. 7, No. 2 (Fall 1995), pp. 7-12.

³⁰ Fox J A, Woodall P (2006). Cashed Out: Consumers Pay Steep Premium to “Bank” at Check Cashing Outlets. Available at: http://consumerfed.org/pdfs/CFA_2006_Check_Cashing_Study111506.pdf.

³¹ Van Veen F, Göritz A, Sattler S (2004). Response effects of prenotification, prepaid cash, prepaid vouchers, and postpaid vouchers: an experimental comparison. *Social Science Computer Review*. Available at: <http://ssc.sagepub.com/content/early/2015/05/05/0894439315585074.abstract>.

³² Birnholtz J P, Horn D B, Finholt T A, Bae S J (2006). The effects of cash, electronic, and paper gift certificates as respondent incentives for a web-based survey of technologically sophisticated respondents. *Social Science Computer Review*.

and subcontractors will sign a confidentiality and nondisclosure agreement [Appendix AM]. We will ensure the privacy and security of electronic data during the data collection and processing period following the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports.^{33,34} Names and phone numbers will not be linked to participants' responses, survey respondents will have a unique ID number, and analysis will be conducted on datasets that include only respondent ID numbers. All data will be securely transmitted to Westat via secure fax, FTP site, or telephone; and will be stored in locked file cabinets or password-protected computers, and accessible only to Westat project staff. Names and phone numbers will be destroyed within 12 months after the end of the data collection period. Westat's Institutional Review Board (IRB) serves as the organization's administrative body, and all research involving interactions or interventions with human subjects is within its purview. The IRB approval letter from Westat is in Appendix AN.

A.11 Justification for Sensitive Questions

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

In general, questions on the SPS, Outlet Survey, Core Program Data, and key informant interview discussion guides are not considered sensitive. The SPS includes household food security questions; it is possible some SNAP participants may consider these questions sensitive. However, participation in this study is voluntary and participants can choose not to answer any of these or any other questions.

³³Published in the *Federal Register* on April 25, 1991 (56 FR 19078).

³⁴ Published in the *Federal Register*, Vol. 65, No. 63, March 31, 2000 (FR 00-8005).

A.12 Estimates of Respondent Burden Including Annualized Hourly Costs

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

- Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.
- Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.

Table A.12.1 presents the number of respondents, frequency of response, and annual hour burden for State/Local Agency Data Managers and FINI program administrators (State/Local Government), SNAP beneficiaries (households and individuals), and FINI Grantees and FINI outlet operators (Business-for- and Business-not-for-profit).

- **State/Local SNAP Agency Staff.** We will request SNAP administrative caseload files from State agencies that host FINI outlets. We will send an introductory email to all States that have at least 5 FINI outlets.³⁵ Since a list of 2016 FINI grantees is not available at this time, we assume that we will need to request SNAP administrative data files from 51 States; this represents the maximum possible burden to obtain SNAP administrative data. Participant burden for state agency staff includes time to read the request email, participate in the telephone discussion, develop and sign off on the data sharing agreement, prepare the necessary data files, and submit these using a secure FTP server or an encrypted email.
- **SNAP Participants.** For the pre-SPS, the sample size of SNAP participants is 7,590, which includes a reserve sample of 1,518. We

³⁵ We will not set a minimum threshold for number of outlets for grantees that operate FINI in only one State. This will ensure that all grantees are represented in the national evaluation.

expect 54 percent of the total sampled individuals will complete the pre-SPS (including web, mail, and telephone). All pre-SPS respondents will be invited to complete the post-SPS (n=4,128); the expected response rate for the post-SPS is 56 percent (2,310). Participant burden for the pre- and post-SPS includes reading invitation, reminder post cards, and thank you letters, and completing the online, hard copy, or telephone survey³⁶. We will also recruit 60 SNAP participants to participate in the key informant interviews; the expected response rate for participation in the key informant survey is 80 percent

- **Grantees.** The Grantees include State/local agencies and business –for and business – not-for profit organizations. For the purpose of sampling SNAP participants, all grantees will review the email requesting outlet characteristics and submit the outlet characteristics form. We will select 60 SNAP participants to participate in key informant interviews by telephone. We expect to schedule interviews with 50 SNAP participants (80 percent of sampled participants) and conduct interviews with 40 participants (80 percent of invited participants). All 35 FINI grantees will respond to the annual grantee level and quarterly outlet level Core Program Data forms. All grantees will also participate in key informant interviews. All grantees will respond to the outlet data form
- **Outlet Operators.** The Outlet Survey will be mailed to all FINI Retail Operators (3,600); 80 percent of the outlet staff will complete the return the survey (2,880). Participant burden includes reading invitation and reminder letters, completing the survey, and reading the thank you postcard.

The estimated annualized cost is \$7.25 per hour for SNAP participants (average national minimum wage); \$53.15 per hour for state and local SNAP grantees/program administrators (job category “Management Occupations” code #11-0000); and \$13.61 per hour for retailers/markets and local community organization representatives staff (job category “Healthcare Support Occupations” code #31-0000). As stated in the award requirement, FINI grantees

³⁶ Two main assumptions made to compute response rates for the pre- and post-SPS surveys include: (1) We will deploy the entire reserve sample to obtain the necessary number of completed surveys and (ii) ineligible are included in the denominator since there is no mechanism to identify them.

are expected to keep data records; therefore, burden hours for recordkeeping have not been estimated.

Table A.12.1. Respondent burden and cost estimate

Affected Public	Respondent Description	Type of Survey Instrument	Appendices	Sample size	Estimated Sample Size and Respondent Burden												
					Responses					Non-Responses					Grand Total		
					Number of Respondents	Frequency of Response (annual)	Total Annual Responses	Average Hours per Response	Sub-Total Annual Burden	Number of non-respondents	Frequency of Response (annual)	Total Annual Responses	Average Hours per response	Sub-Total Annual Burden	Est. Grand Total Burden hours for respondents and non respondents	Hourly Rate	Total Annualized Cost
Household and Individuals	SNAP participants	Pretest for 2 SPS questions	AO	6	6	1	6	0.2500	1.5000	0	1	0	0.250	0	1.5000	7.25	10.88
		Pre-SPS Invitation Letter (a)	D	7,590	6,831	1	6,831	0.0501	342.2331	759	1	0	0.050	0	342.2331	7.25	2481.19
		Pre-SPS - Web(c)	E	6,831	1,025	1	1,025	0.3340	342.2331	5806	1	0	0.334	0	342.2331	7.25	2481.19
		SPS Reminder Postcard - 1 (b)	F	7,590	4,554	1	4,554	0.0167	76.0518	3036	1	0	0.017	0	76.0518	7.25	551.38
		Pre-SPS Reminder Letter 1 (d)	G	6,565	5,909	1	5,909	0.0167	98.6772	657	1	0	0.017	0	98.6772	7.25	715.41
		Pre-SPS Teleform - 1 (e)	E	5,909	2,068	1	2,068	0.3340	690.7405	3841	1	0	0.334	0	690.7405	7.25	5007.87
		SPS Reminder Postcard -2 (b)	H	6,565	3,939	1	3,939	0.0167	65.7848	2626	1	0	0.017	0	65.7848	7.25	476.94
		Pre-SPS Reminder Letter 2 (d)	I	4,497	4,048	1	4,048	0.0167	67.5939	450	1	0	0.017	0	67.5939	7.25	490.06
		Pre-SPS Teleform -2 (f)	E	4,048	1,012	1	1,012	0.3340	337.9694	3036	1	0	0.334	0	337.9694	7.25	2450.28
		Pre-SPS - Telephone Survey (g)	J	334	23	1	23	0.3340	7.8090	311	1	0	0.334	0	7.8090	7.25	56.62
		Voicemail/Text Message Reminder for Telephone Survey (h)	K	334	200	1	200	0.0167	3.3467	134	1	0	0.017	0	3.3467	7.25	24.26
		Pre-SPS Thank You Letter (i)	L	4,128	4,128	1	4,128	0.0167	68.9376	0	1	0	0.017	0	68.9376	7.25	499.80
		Post-SPS Web Invitation letter (j)	M	4,128	3,715	1	3,715	0.0501	186.1315	413	1	0	0.050	0	186.1315	7.25	1349.45
		Post-SPS - Web (c)	N,O	3,715	669	1	669	0.3340	223.3578	3046	1	0	0.334	0	223.3578	7.25	1619.34
SPS Reminder Postcard - 1 (b)	F	4,128	2,477	1	2,477	0.0167	41.3626	1651	1	0	0.017	0	41.3626	7.25	299.88		

		Post-SPS Reminder Letter 1 (d)	P	3,459	3,113	1	3,113	0.0167	51.9927	346	1	0	0.017	0	51.9927	7.25	376.95
		Post-SPS Teleform - 1 (e)	N,O	3,113	1,090	1	1,090	0.3340	363.9492	2024	1	0	0.334	0	363.9492	7.25	2638.63
		SPS Reminder Postcard - 2 (b)	H	3,113	1,868	1	1,868	0.0167	31.1956	1245	1	0	0.017	0	31.1956	7.25	226.17
		Post-SPS Reminder Letter 2 (d)	Q	2,370	2,133	1	2,133	0.0167	35.6150	237	1	0	0.017	0	35.6150	7.25	258.21
		Post-SPS Teleform - 2 (f)	N,O	2,133	533	1	533	0.3340	178.0751	1599	1	0	0.334	0	178.0751	7.25	1291.04
		Post-SPS - Telephone Survey (g)	J	263	18	1	18	0.3340	6.1579	245	1	0	0.334	0	6.1579	7.25	44.64
		Voicemail/Text Message Reminder for Telephone Survey (h)	K	263	158	1	158	0.0167	2.6391	105	1	105	0.017	1,7593952	4.3985	7.25	31.89
		Post-SPS Thank You Letter (i)	R	2,310	2,310	1	2,310	0.0167	38.5770	0	1	0	0.017	0	38.5770	7.25	279.68
		SNAP Participant KII Invitation Letter (k)	S	60	60	1	60	0.0167	1.0020	0	1	0	0.017	0	1.0020	7.25	7.26
		SNAP Participant KII Recruitment Script (l)	T	60	51	1	51	0.0835	4.2585	9	1	9	0.084	0.7515	5.0100	7.25	36.32
		SNAP participant KII Confirmation Letter (k)	U	51	51	1	51	0.0167	0.8517	0	1	0	0.017	0	0.8517	7.25	6.17
		SNAP Participant KII Discussion Guide (m)	V	51	41	1	41	1.0000	40.8000	10	1	10	1.000	10.2	51.0000	7.25	369.75
		SNAP participant KII Thank you Letter (i)	W	41	41	1	41	0.0167	0.6814	0	1	0	0.017	0	0.6814	7.25	4.94
Individuals and Households Subtotal				7,596	6,837	7,6160	52071		3309.5243	759	0.1641	125		12.7	3322.2351		24086.20
		Submit SNAP administrative file	-	51	51	1	51	0.0250	1.2750	0	1	0	0.025	0	1.2750	53.15	67.77
		Request to complete Outlet Characteristics Form	X	5	5	1	5	0.0501	0.2505	0	1	0	0.050	0	0.2505	53.15	13.31
		Outlet Characteristics Form	X	5	5	1	5	1.0000	5.0000	0	1	0	1.000	0	5.0000	53.15	265.75
		Grantee Administrator Interview Scheduling (script), Year 1 (n)	Y	2	2	1	2	0.0835	0.1670	0	1	0	0.084	0	0.1670	53.15	8.88
		Grantee Administrator Interview Discussion Guide, Year 1 (o)	Y	2	2	1	2	1.5000	3.0000	0	1	0	1.500	0	3.0000	53.15	159.45
		Grantee Administrator	Z	2	2	1	2	0.0167	0.0334	0	1	0	0.017	0	0.0334	53.15	1.78

		Interview Thank you Postcard , Year 1(i)															
		Quarterly Core Program Data Form Request Email, Year 1 (p)	AB	2	2	4	8	0.0167	0.1336	0	4	0	0.017	0	0.1336	53.15	7.10
		Annual Core Program Data Form Request Email , Year 1(p)	AC	2	2	1	2	0.0167	0.0334	0	1	0	0.017	0	0.0334	53.15	1.78
		Quarterly Core Program Data Form, Year 1 (q)	AD	2	2	4	8	0.3340	2.6720	0	4	0	0.334	0	2.6720	53.15	142.02
		Annual Core Program Data Form, Year 1 (q)	AE	2	2	1	2	0.2500	0.5000	0	1	0	0.250	0	0.5000	53.15	26.58
		Grantee Administrator Interview Scheduling (script), Year 2 (n)	Y	5	5	1	5	0.0835	0.4175	0	1	0	0.084	0	0.4175	53.15	22.19
		Grantee Administrator Interview Discussion Guide, Year 2 (o)	Y	5	5	1	5	1.5000	7.5000	0	1	0	1.500	0	7.5000	53.15	398.63
		Grantee Administrator Thank you Postcard, Year 2 (i)	AA	5	5	1	5	0.0167	0.0835	0	1	0	0.017	0	0.0835	53.15	4.44
		Quarterly Core Program Data Form Request Email, Year 2 (p)	AB	5	5	4	20	0.0167	0.3340	0	4	0	0.017	0	0.3340	53.15	17.75
		Annual Core Program Data Form Request Email, Year 2 (p)	AC	5	5	1	5	0.0167	0.0835	0	1	0	0.017	0	0.0835	53.15	4.44
		Quarterly Core Program Data Form, Year 2 (q)	AD	5	5	4	20	0.3340	6.6800	0	4	0	0.334	0	6.6800	53.15	355.04
		Annual Core Program Data Form, Year 2 (q)	AE	5	5	1	5	0.2500	1.2500	0	1	0	0.250	0	1.2500	53.15	66.44
		Quarterly Core Program Data Form Request Email, Year 3 (p)	AB	5	5	4	20	0.0167	0.3340	0	4	0	0.017	0	0.3340	53.15	17.75
		Annual Core Program Data Form Request Email, Year 3 (p)	AC	5	5	1	5	0.0167	0.0835	0	1	0	0.017	0	0.0835	53.15	4.44
		Quarterly Core Program Data Form, Year 3 (q)	AD	5	5	4	20	0.3340	6.6800	0	4	0	0.334	0	6.6800	53.15	355.04
		Annual Core Program Data Form, Year 3 (q)	AE	5	5	1	5	0.2500	1.2500	0	1	0	0.250	0	1.2500	53.15	66.44
		Email to Grantees for Followup with Nonresponding Outlets	AI	5	5	1	5	0.0501	0.2505	0	1	0	0.050	0	0.2505	53.15	13.31
State/Local Government Subtotal (i)				56	56	3.70	207		38.0114	0	0	0	0	38.0114		2020.31	
Profit/Non-Profit Business Subtotal	Grantees and Administrators/Retailers/Local Community Org. Staff	Outlet Survey Cognitive Testing	AP	4	4	1	4	0.2500	1.0000	0	1	0	0.250	0	1.0000	53.15	53.15
		Email to accompany Outlet Characteristics Form	X	30	30	1	30	0.0501	1.5030	0	1	0	0.050	0	1.5030	53.15	79.88
		Outlet Characteristics Form	X	30	30	1	30	1.0000	30.0000	0	1	0	1.000	0	30.0000	53.15	1594.50
		Grantee Administrator Interview Scheduling (script),	Y	30	30	1	30	0.0835	2.5050	0	1	0	0.084	0	2.5050	53.15	133.14

		Year 1 (n)															
		Grantee Administrator Interview Discussion Guide, Year 1 (o)	Y	30	30	1	30	1.5000	45.0000	0	1	0	1.500	0	45.0000	53.15	2391.75
		Grantee Administrator Interview Thank you Postcard , Year 1(i)	Z	30	30	1	30	0.0167	0.5010	0	1	0	0.017	0	0.5010	53.15	26.63
		Quarterly Core Program Data Form Request Email, Year 1 (p)	AB	30	30	4	120	0.0167	2.0040	0	4	0	0.017	0	2.0040	53.15	106.51
		Annual Core Program Data Form Request Email , Year 1(p)	AC	30	30	1	30	0.0167	0.5010	0	1	0	0.017	0	0.5010	53.15	26.63
		Quarterly Core Program Data Form, Year 1 (q)	AD	30	30	4	120	0.3340	40.0800	0	4	0	0.334	0	40.0800	53.15	2130.25
		Annual Core Program Data Form, Year 1 (q)	AE	30	30	1	30	0.2500	7.5000	0	1	0	0.250	0	7.5000	53.15	398.63
		Grantee Administrator Interview Scheduling (script), Year 2 (n)	Y	30	30	1	30	0.0835	2.5050	0	1	0	0.084	0	2.5050	53.15	133.14
		Grantee Administrator Interview Discussion Guide, Year 2 (o)	Y	30	30	1	30	1.5000	45.0000	0	1	0	1.500	0	45.0000	53.15	2391.75
		Grantee Administrator Thank you Postcard, Year 2 (i)	AA	30	30	1	30	0.0167	0.5010	0	1	0	0.017	0	0.5010	53.15	26.63
		Quarterly Core Program Data Form Request Email, Year 2 (p)	AB	30	30	4	120	0.0167	2.0040	0	4	0	0.017	0	2.0040	53.15	106.51
		Annual Core Program Data Form Request Email, Year 2 (p)	AC	30	30	1	30	0.0167	0.5010	0	1	0	0.017	0	0.5010	53.15	26.63
		Quarterly Core Program Data Form, Year 2 (q)	AD	30	30	4	120	0.3340	40.0800	0	4	0	0.334	0	40.0800	53.15	2130.25
		Annual Core Program Data Form, Year 2 (q)	AE	30	30	1	30	0.2500	7.5000	0	1	0	0.250	0	7.5000	53.15	398.63
		Quarterly Core Program Data Form Request Email, Year 3 (p)	AB	30	30	4	120	0.0167	2.0040	0	4	0	0.017	0	2.0040	53.15	106.51
		Annual Core Program Data Form Request Email, Year 3 (p)	AC	30	30	1	30	0.0167	0.5010	0	1	0	0.017	0	0.5010	53.15	26.63
		Quarterly Core Program Data Form, Year 3 (q)	AD	30	30	4	120	0.3340	40.0800	0	4	0	0.334	0	40.0800	53.15	2130.25
		Annual Core Program Data Form, Year 3 (q)	AE	30	30	1	30	0.2500	7.5000	0	1	0	0.250	0	7.5000	53.15	398.63
		Email to Grantees for Followup with Nonresponding Outlets	AI	30	30	1	30	0.0501	1.5030	0	1	0	0.050	0	1.5030	53.15	79.88
		Outlet Survey Invitation Letter (r)	AF	3600	3600	1	3600	0.0501	180.3600	0	1	0	0.050	0	180.3600	13.61	2454.70
		Outlet Survey Reminder Letter (s)	AH	1800	1710	1	1710	0.0167	28.5570	90	1	90	0.017	2	30.0600	13.61	409.12

		Outlet Survey (t)	AG	3600	2880	1	2880	0.1670	480.9600	720	1	720	0.167	120	601.2000	13.61	8182.33
		Outlet Survey Thank you Postcard (i)	AJ	2880	2880	1	2880	0.0167	48.0960	0	1	0	0.017	0	48.0960	13.61	654.59
Profit/Non-Profit Business Subtotal				3,634	2,914	4	12244		1018.2460	720	1.125	810		121.74	1139.9890		26597.24
GRAND TOTAL				11,286	9,807		64,522		4365.7817	1479		935		134.45	4500.2355		52703.76

- (a) Assume 90 percent of sampled participants will read the invitation letter - 5 percent postal nondeliverables and 5 percent not read
- (b) Assume 60 percent of sampled participants will receive a reminder postcard
- (c) Assume 15 percent of participants who read the invitation letter will complete the pre survey by web and 18 percent will complete the post survey by web
- (d) Reminder letters will be sent to all non-respondents; assume 90 percent will read the letter - 5 percent postal nondeliverables and 5 percent not read
- (e) Assume 35 percent of those who read the first reminder letter will complete the teleform survey
- (f) Assume 25 percent of those who read the second reminder letter will complete the teleform survey
- (g) Assume Non-respondents will be contacted by phone to achieve the targeted number of completes; assume 7 percent will complete the survey by phone
- (h) Non-respondents will be contacted by phone to achieve the targeted number of completes; messages will be left on voicemail for 60 percent with working phone numbers and voicemails
- (i) Thank you letters will be read by all respondents
- (j) Post-SPS invitation letters will be mailed to all those who completed the pre-SPS; 90 percent will read the invitation letter
- (k) Assume all SNAP participants will read the KII invitation letter and KII Confirmation Letter
- (l) Assume 85 percent of those contacted by phone will be scheduled for KII
- (m) Assume 80 percent of those who are scheduled for KII will participate in KII
- (n) Assume all grantees will be contacted to schedule KII
- (o) Assume all grantees will participate in KII
- (p) Assume all grantees will read the program data form request email
- (q) Assume all grantees will complete the program data forms. If grantees request to submit more than one response on the annual form to accomodate subawardees or partner organizations, the agency will work with them on an individual basis.
- (r) Assume all outlet operators will read the invitation letter
- (s) Assume 50 percent of outlet operators will need a reminder letter and 95 percent of these will read it
- (t) Assume 80 percent of outlet operators will complete the outlet survey

- (a) Assume 90 percent of sampled participants will read the invitation letter – 5 percent postal nondeliverables and 5 percent not read.
- (b) Assume 60 percent of sampled participants will receive a reminder postcard.
- (c) Assume 15 percent of participants who read the invitation letter will complete the pre survey by web and 18 percent will complete the post survey by web.
- (d) Reminder letters will be sent to all non-respondents; assume 90 percent will read the letter – 5 percent postal nondeliverables and 5 percent not read.
- (e) Assume 35 percent of those who read the first reminder letter will complete the teleform survey.
- (f) Assume 25 percent of those who read the second reminder letter will complete the teleform survey.
- (g) Assume nonrespondents will be contacted by phone to achieve the targeted number of completes; assume 7 percent will complete the survey by phone.
- (h) Non-respondents will be contacted by phone to achieve the targeted number of completes; messages will be left on voicemail for 60 percent with working phone numbers and voicemails.
- (i) Thank you letters will be read by all respondents.
- (j) Post-SPS invitation letters will be mailed to all those who completed the pre-SPS; 90 percent will read the invitation letter.
- (k) Assume all SNAP participants will read the KII invitation letter and KII confirmation letter.
- (l) Assume 85 percent of those contacted by phone will be scheduled for KII.
- (m) Assume 80 percent of those who are scheduled for KII will participate in KII.
- (n) Assume all grantees will be contacted to schedule KII.
- (o) Assume all grantees will participate in KII.
- (p) Assume all grantees will read the program data form request email.
- (q) Assume all grantees will complete the program data forms. If grantees request to submit more than one response on the annual form to accommodate subawardees or partner organizations, the agency will work with them on an individual basis.
- (r) Assume all outlet operators will read the invitation letter.
- (s) Assume 50 percent of outlet operators will need a reminder letter and 85 percent of these will read it.
- (t) Assume 80 percent of outlet operators will complete the outlet survey.

A.13 Estimates of Other Total Annualized Cost Burden

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 ongoing operation/maintenance costs associated with this information collection.

A.14 Annualized Cost to the Federal Government

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

The total cost to the Federal Government is \$4,360,626 over the 5-year period or \$872,125 on annualized basis. The largest cost to the Federal Government is to pay the contractor \$4,341,978³⁷ to conduct this study and deliver reports and data files. The information collection also assumes a total of 80 hours of a Federal Employee's time per year: for a GS-13, Step 4 in the Washington, DC area, at \$47.87 per hour for a total of \$3,829.60 per year. The 2015 Federal Employee Wage rate is from the Office of Personnel Management (OPM).

³⁷The contractor currently has a task order contract for \$2,099,676 to evaluate the Cycle 2014-2015 FINI grants. The estimated value of the contract to evaluate the Cycle 2016 grants is \$2,242,302. FNS also has the option to award the contractor with task orders to evaluate the Cycles 2017 and 2018 FINI grants.

A.15 Explanation for Program Changes or Adjustments

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

This is a new collection of information, and is estimated to add 4,500 burden hours to the OMB information collection inventory.

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

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

We will begin the evaluation analyses by conducting a process study of the grantees' implementation of their programs (Research Objective 1). After gaining an understanding of how the programs are being implemented, we will examine their impact on outcomes to determine which program clusters are having a positive effect on increasing the purchase and consumption of fruits and vegetables (Research Objective 2). Finally, we will compare impacts across intervention clusters to determine if there are certain program traits or conditions that lead to positive impacts (Research Objective 3).

To meet Research Objective 1, we will analyze data from multiple sources to determine how the programs are being implemented and understand the challenges. Data for each grantee will consist of quantitative information such as the grant award amount, the features of the program and community, and verbatim transcriptions of interviews with program administrators and SNAP participants. Analysis types will include content analysis, GIS analysis, and descriptive univariate and bivariate analyses.

To meet Research Objective 2 to assess program effects, outcome data will largely be collected by the SNAP Participant Survey. Although we will examine multiple outcomes, the approach for assessing outcomes will follow the same general difference-in-differences approach. In this approach, the dependent variable is the change in the outcome of interest between the pre and post- time periods. The

change in outcomes in the comparison group represents the general trend (or the change that would have occurred in absence of the FINI program). For each cluster, we will measure the change in outcomes for the individual between the pre- and post- time periods in the intervention cluster and in the comparison groups. Because the SNAP participants are not randomly assigned to the intervention and comparison groups, it is possible that the two groups differ in their characteristics. This is minimized through the use of regression. We will use regression to estimate the relationship between the change in the outcome of interest and a series of SNAP participant characteristics as well as an intervention/comparison indicator. In addition, content analysis of SNAP participant KIIs will contextualize the findings reported from the SNAP Participant Survey.

To meet Research Objective 3, the comparative analysis will focus on select cross-cluster changes to determine if there are certain program features or structures that are associated with the larger increases in outcomes. For this analysis, we will focus on the changes in fruit and vegetable purchasing and consumption and limit the analysis to the intervention clusters. To assess what program features vary across clusters and within clusters, we will examine the Core Program Data. Program features or structures for which there is variation will be included as covariates in the analysis. We will pool the intervention data across all four clusters to examine the relative differences in outcomes due to program features given a common population.

The planned schedule for the study showing sample selection, beginning and ending dates of collection of information, completion of reports, and publication dates is presented in Table A.16.1.

Table A.16.1. Data collection and reporting schedule

Activity	Schedule
Pre-SNAP Participant Survey (SNAP Participant Survey) ^a	February – April 2017
Post-SNAP Participant Survey ^b	August – October 2017
Key Informant Interview – Grantee Administrators, Year 2 ^c	September – October 2016
Key Informant Interview – Grantee Administrators, Year 3 ^c	September – October 2017
Key Informant Interview – SNAP Participants ^d	January – March 2018
Outlet Survey, Grant Cycle 2015 ^e	October – December 2016
Outlet Survey, Grant Cycle 2016 ^e	October – December 2017

Core Program Data ^f	July 2016 – June 2019
Preliminary Report	December 2016
Interim Report	Spring 2018
Final Report	Spring 2020

^aSchedule reflects all activities associated with conducting the Pre-SNAP Participant Survey and includes mailing out invitation letters, reminder postcards, hard copy surveys, and telephone administration of surveys.

^bSchedule reflects all activities associated with conducting the Post-SNAP Participant Survey and includes mailing out invitation letters, reminder postcards, hard copy surveys, and telephone administration of surveys.

^cSchedule reflects all activities associated with conducting key informant interviews with grantees and includes sending out invitations, scheduling and conducting telephone discussions, and mailing thank you postcards.

^dSchedule reflects all activities associated with conducting key informant interviews with SNAP participants and includes mailing invitation letters, scheduling and conducting discussions, and mailing thank you letters.

^eSchedule reflects all activities associated with conducting Outlet Surveys and includes mailing invitation letters, reminder letters, and thank you letters.

^fSchedule reflects all activities associated with obtaining annual and Core Program Data; an email will be sent once a year, to request annual core program data and an email will be send once each quarter to request quarterly core program data.

Final reports will be posted on the FNS web site. Findings may also be published in peer-reviewed reports, professional journals, and publications intended for general audiences such as nutrition educators. Early results from the process study will be available in the Preliminary Report; early results from outcome study will be available in the Interim Report; and all results from the process study, outcome study, and comparative analysis will be presented in the Final Report in January 2020.

A.17 Reason Display of OMB Expiration Date Is Inappropriate

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 will display the OMB approval number and expiration date.

A.18 Exceptions to Certification for Paperwork Reduction Act Submissions

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

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