

**FDPIR Paraprofessional Nutrition Training Assessment for
Indian Tribal Organizations
Statement for Paperwork Reduction Act Submission
Revision of Current OMB Number 0584-NEW
Part A: Justification**

DATE

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INTRODUCTION

The objective of the Food Distribution Program on Indian Reservations (FDPIR) Paraprofessional Nutrition Training Assessment for Indian Tribal Organizations is to provide the Food and Nutrition Service (FNS) with an assessment of the best way to deliver paraprofessional nutrition training to Indian Tribal Organization (ITO) staff working on the FDPIR program across the country. In particular, data collection and analysis will provide insight into the following:

- ITO interest in a paraprofessional training project
- The current availability of nutrition education at ITOs
- Nutrition training topics that ITOs and FDPIR staff value the most
- The most effective and culturally relevant format for training
- Motivational factors for staff that might influence their participation in nutrition training

The study includes three training assessments that will be used to conduct open-ended, semi-structured telephone interviews with 23 FDPIR directors and 23 FDPIR staff working at 23 ITOs, and with 15 key stakeholders (with an additional 4 pretest respondents) who have expertise in ITOs, nutrition, training, and/or FDPIR.

PART A: JUSTIFICATION

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.

This is a new information collection request. FDPIR provides U.S. Department of Agriculture (USDA) foods to low-income families, including the elderly, living on Indian reservations, and to qualified families living in certain areas near reservations and in Oklahoma.

FDPIR offers participants living in rural areas within Indian reservations a more accessible alternative to Supplemental Nutrition Assistance Program (SNAP) benefits. Many State agency (SA) and ITO staff who deliver FDPIR benefits lack formal training to provide nutrition information to their clients. To fill this gap, the Food Distribution Division (FDD) at FNS is considering developing and delivering a paraprofessional training program to FDPIR staff. The objective of the FDPIR Paraprofessional Nutrition Training Assessment is to provide FNS with an evaluation of the best way to deliver paraprofessional nutrition training to FDPIR staff working for ITOs across the country.

Overall authorization of FDPIR is provided under Section 4(b) of the Food and Nutrition Act of 2008 (see Appendix A) and Section 4(a) of the Agriculture and Consumer Protection Act of 1973 (see Appendix A). Federal regulations governing the program can be found in Title 7 Code of Federal Regulations (CFR) Parts 250, 253, and 254.

Authorizing legislation also allows the Secretary of Agriculture broad authority to conduct research designed to improve USDA programs. The regulatory provisions contained under CFR Title 7, Part 282.1 authorize the Secretary to conduct demonstration, research, and evaluation projects. Section 4 [7 U.S. 2013] (b) of the Food and Nutrition Act of 2008, Public Law 110-246, authorizes FNS to award funds to FDPIR to conduct nutrition education activities for FDPIR and FDPIR-eligible participants.

Background

Established under the Food Stamp Act of 1977 and the Food and Nutrition Act of 2008 and administered at the Federal level by FNS within the USDA, the tribes and intertribal organizations can decide whether or not to make FDPIR foods available as an alternative to

SNAP.¹ Congress created SNAP, formerly known as the Food Stamp Program, to bolster the nutrition of Americans living in poverty. FDPIR was established, in part, to address the travel distances required of rural SNAP recipients on and near Indian reservations.² FDPIR is administered locally by ITOs or by an SA. FNS purchases and ships FDPIR foods to the ITOs or SA based on their orders from a list of 70 available foods.³ FNS has worked to increase the nutritional quality of the foods since the program's inception by offering, for example, low-sodium beans and tomatoes, low-fat bakery mix, chicken, and whole grains;⁴ by partnering with the National Association of Food Distribution Program on Indian Reservations (NAFDPIR) to review the nutritional quality of food packages; and by acknowledging the cultural and religious significance of food that exists beyond calories and food safety by seeking viable channels to offer traditional foods such as bison, salmon, and blue corn meal.⁵ A recent study comparing nutritional quality among Federal food assistance programs shows that the FDPIR food package provided foods that contained a variety of nutrients and sufficient calories for participants.⁶

¹ Finegold, K., Pindus, N., Levy, D., Tannehill, T., & Hillbrant, W. (2009, November). *Tribal food assistance: A comparison of the Food Distribution Program on Indian Reservations (FDPIR) and the Supplemental Nutrition Assistance Program (SNAP)*. Retrieved from: <http://www.fns.usda.gov/sites/default/files/fdpi/12.13.12-FDPIR-Study-Urban-Institute.pdf>

² Fox M. K., Hamilton W, & Lin B-H. (2004). Effects of food assistance and nutrition programs on nutrition and health. *Executive Summary of the Literature Review, Food Assistance and Nutrition Research Report, 19(4)*.

³ Food and Nutrition Service. (2015, December 30). *Food Distribution Program on Indian Reservations (FDPIR)*. Retrieved from: <http://www.fns.usda.gov/fdpi/about-fdpi>

⁴ Harper, E., Orbeta, R., Southworth, L., Meade, K., Cleveland, R., Gordon, S. . . . Hirschman, J. (2008). *FDPIR food package nutritional quality: Report to Congress*. Retrieved from: http://www.fns.usda.gov/sites/default/files/FDPIR_FoodPackage_0.pdf

⁵ Food and Nutrition Service. (2014). *FDPIR food package review, Workgroup Meeting Minutes*. In: Agriculture USDo, ed. Retrieved from: <https://www.fns.usda.gov/fdpi/fdpi-food-package-review-work-group>

⁶ Zimmerman, T., Sun, Hu, J., & Dixit-Joshi, S. (2016). *Nutrient and Food Group Analysis of USDA Foods in Five of Its Food and Nutrition Programs*. Project Officer Dennis Ranalli. Alexandria, VA: Food and Nutrition Service, Office of Research and Analysis.

American Indians in rural areas experience greater food insecurity than any other group in the United States,^{7,8} a higher age-adjusted prevalence of diabetes than any other ethnic group in the country,⁹ and about twice the occurrence of nutrition-related disease as Non-Hispanic White Americans.¹⁰ Effective programs of nutrition education that are well-designed and culturally appropriate for diverse tribal cultures are needed.^{11,12} Suggestions to offer nutrition education to ensure that recipients receive help with their dietary needs began early in the program.^{13,14} In addition to offering online modules for training new program directors, ITO staff, and SA certification workers to successfully administer the program, FNS offers grants for ITOs and SAs to provide nutrition education to participants that is designed to enhance nutrition knowledge and foster positive lifestyle changes (OMB No. 0584-0512, EXPIRES 03/31/2019).¹⁵ SNAP, authorized by the Food and Nutrition Act of 2008, Public Law 110-246, allows FNS to award funds to FDPIR to conduct nutrition education activities for FDPIR and FDPIR-eligible participants. Since 2008, FNS has provided Food Distribution Program Nutrition Education

⁷ Kaufman, P., Dicken, C., & Williams, R. (2014, December). *Measuring access to healthful, affordable food in American Indian and Alaska Native tribal areas*. U.S. Department of Agriculture, Economic Research Service Economic Information Bulletin (EIB 131). Retrieved from: <http://www.ers.usda.gov/publications/pub-details/?pubid=43908>

⁸ Bauer, K. W., Widome, R., Hime, J. H., Smyth, M., Rock, B. H., Hannan, P. J., & Story, M. (2012, July.) High food insecurity and its correlates among families living on a rural American Indian Reservation. *American Journal of Public Health*. 102(7):1346–1352.

⁹ American Diabetes Association. (2016). *American Indian/Alaska Native programs*. Available at: <http://www.diabetes.org/in-my-community/awareness-programs/american-indian-programs/>.

¹⁰ Oddo, A. G. V. (2012). *Addressing child hunger and obesity in Indian Country: Report to Congress*: Mathematica Policy Research.

¹¹ Parker, S., Hunter, T., Briley, C., Miracle, S., Hermann, J., Van Delinder, J., & Standridge, J. (2011). Formative assessment using social marketing principles to identify health and nutrition perspectives of Native American women living within the Chickasaw Nation boundaries in Oklahoma. *Journal of Nutrition Education and Behavior*, 43(1), 55–62.

¹² Jackson, M. Y., & Mead, P. (1990). Nutrition education for Indian elders. *Journal of Nutrition Education*, 22(6), 311–313.

¹³ Thomas, P. R. (1991). *Improving America's diet and health: From recommendations to action*. Washington, DC: National Academies Press.

¹⁴ Shanklin, D. S., Usher, C. L., & Wildfire, J. B. (1992). Nutrition education needs and services among American Indians participating in a federal food assistance program. *Journal of Nutrition Education*, 24(6), 298–305.

¹⁵ Food and Nutrition Service. (2015, November 5). *Food Distribution Program on Indian Reservations (FDPIR), Nutrition Education Grant Awards*. United States Department of Agriculture. Retrieved from: <http://www.fns.usda.gov/fdpir/fdpir-nutrition-education-grant-awards>

(FDPNE) grants to ITOs and SAs. The primary goal of the FDPNE grants program is to fund current FDPIR allowance holders (i.e., an entity that has a direct agreement with FNS to administer FDPIR) so they can provide nutrition education services to FDPIR participants.¹⁶

This study represents continuing efforts by FNS to offer nutritional expertise to FDPIR participants and ITOs by assessing the interest of staff in FNS-funded nutrition education training intended to equip staff with the knowledge needed to serve as nutrition paraprofessionals for their organizations.

The Study

This study uses data collected from semi-structured interviews to assess the best way to deliver paraprofessional nutrition training for ITOs participating in FDPIR. Semi-structured interviews rely on a written list of questions and topics that need to be covered in a particular order, but also allow for interviewers and respondents to divert and explore new, relevant ideas that arise during the interview. Such a data collection system will allow FNS to identify the exact nutrition training needs of ITOs and tailor any future nutrition training programs accordingly.

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.

a. Study objectives

The purpose of this study is to conduct interviews and collect qualitative data on specific aspects of the FDPIR on ITOs. The findings from this study will be used to assess whether ITOs participating in FDPIR are interested in FNS-funded nutrition training, if offered, and to determine the best way to provide this kind of nutrition training in a way that would meet the

¹⁶16 Food and Nutrition Service. U.S.D.A. F.D.P.N.E. Grant Program. *United States Department of Agriculture*. Retrieved from: <https://www.fns.usda.gov/fdpir/fdpir-nutrition-education-grant-awards>

exact needs of ITOs. The three interview protocols, one each for ITO directors, FDPIR staff, and key stakeholders, are presented in Appendices C1, C2, and C3, respectively.

b. From whom will the information be collected?

Each of the data collection instruments were pretested with one respondent (two respondents for the key stakeholder) of the appropriate type. We (FNS and our Contractors) carefully selected pretest respondents. These respondents were contacted by email (Appendix B1) and telephone (Appendix B2) during the pretesting phase. Respondents evaluated assigned instruments for understandability (confusing wording or layout, failure to grasp what we were looking for, etc.) and length of time to answer.

Approximately 23 ITO directors from FDPIR programs across the U.S., 23 FDPIR staff from 23 ITOs, and 15 key stakeholders that interact with FDPIR (e.g., nutritionists and representatives of FDPIR at FNS Regional Offices, nutritionists at ITOs, members of NAFDPIR, other subject matter experts) will be the source of information for all data collected.

c. How will the information be collected?

All semi-structured interviews will be conducted via telephone by FNS's Contractor's trained ethnographers/qualitative researchers. We will select a nationally representative sample of ITOs, based on factors such as number of enrolled members, number of members participating in FDPIR, and geographic distribution.

ITO Directors

Approximately 2 weeks after OMB approval, selected ITO directors will be sent the invitation email (Appendix B1) detailing the study, asking for their voluntary participation, and asking those interested to schedule their telephone interview. Those ITO directors who do not

respond to this first email may receive the invitation email 3 weeks after OMB approval (Appendix B1), up to two additional times. Those ITO directors who do not respond to any of the email invitations will be called one time, 4 weeks after OMB approval, to invite them to participate (Appendix B2). Participants will receive a confirmation email (Appendix B3) 2 days prior to their telephone interview to confirm the interview date and time, and to provide them with the interview protocol for ITO directors (Appendix C1). Each telephone interview will last approximately 1 hour. Participants will be asked for their permission to record the telephone interview through WebEx, and the audio recording (with no personally identifiable information [PII]) will be used for transcription purposes only. Questions will be structured but probing, and follow-up questions will allow the trained interviewer and participant to explore other relevant topics as they arise. An additional researcher will attend the semi-structured telephone interview to take detailed notes, and upon completion of the interview, transcribe the recording for upload and analysis in NVivo, a qualitative analysis software package.

FDPIR Staff

At the end of each of the ITO director interviews, participants will be asked to identify FDPIR staff they believe would be willing to participate in a similar telephone interview. Within 1 week of receipt of their contact information, these staff will be sent an invitation email detailing the study, asking for their participation, and asking those interested to schedule their interview (Appendix B1). Those FDPIR staff who do not respond to this first email may receive the invitation email 3 weeks after OMB approval (Appendix B1), up to two additional times. Those FDPIR staff who do not respond to any of the email invitations will be called one time, 4 weeks after OMB approval, to invite them to participate (Appendix B2). FDPIR staff will receive a confirmation email (Appendix B3) 2 days prior to their telephone interview to confirm the

interview date and time, and to provide them with the telephone interview protocol for FDPIR staff (Appendix C2). Each telephone interview will last approximately 1 hour. Participants will be asked for their permission to record the telephone interview through WebEx, and the audio recording (with no PII) will be used for transcription purposes only. Questions will be structured but probing, and follow-up questions will allow the trained interviewer and participant to explore other relevant topics as they arise. An additional researcher will attend the semi-structured telephone interview to take detailed notes and upon completion of the interview, transcribe the recording for upload and analysis in NVivo, a qualitative analysis software package.

Key Stakeholders

Key stakeholders will be identified and contacted by FNS and informed about the study. Once FNS receives confirmation from key stakeholders, each participant will be sent an email detailing the study and asking them to schedule their interview (Appendix B1). Those key stakeholders who do not respond to this first email may receive the invitation email 3 weeks after OMB approval (Appendix B1), up to two additional times. Those key stakeholders who do not respond to any of the email invitations will be called one time, 4 weeks after OMB approval, to invite them to participate (Appendix B2). Key stakeholder participants will receive a confirmation email (Appendix B3) 2 days prior to their interview to confirm the interview date and time, and to provide them with the interview protocol for key stakeholders (Appendix C3). Each interview will last approximately 1 hour. Participants will be asked for their permission to record the telephone interview through WebEx, and the audio recording (with no PII) will be used for transcription purposes only. Questions will be structured but probing, and follow-up questions will allow the trained interviewer and participant to explore other relevant topics as they arise. An additional researcher will attend the semi-structured telephone interview to take

detailed notes, and upon completion of the interview, transcribe the recording for upload and analysis in NVivo, a qualitative analysis software package.

d. How frequently will the information be collected?

Each participant in this study will participate in one telephone interview. There is potential for post-interview follow-up questions if further clarification is needed on any particular interview during analysis. However, this is minimized by the fact that interviewers are trained to seek clarification during interviews.

e. Will the information be shared with any other organizations inside or outside USDA or the government?

The aggregated and analyzed data will be published and will be available to the public. Again, all results will be presented in aggregate form in the final report, made available in the research section of the USDA Food and Nutrition Service website,

<http://www.fns.usda.gov/ops/research-and-analysis>.

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 burden.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. FNS also expects many of the participants in this project to be unfamiliar with electronic surveys and to have unreliable access to the Internet. Therefore, this study blends email and phone technology to contact and coordinate with participants and relies on phones for data collection. There is no electronic submission system available for this data collection.

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.

Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, State administrative agency reporting requirements, and special studies by other government and private agencies. To our knowledge, there is no similar information available or being collected for the current timeframe.

A.5 If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

This is a one-time voluntary information collection request. Information being requested or required has been held to the minimum that is required for the intended use. The study includes approximately six large, nine medium, and eight small ITOs. Although small ITOs (defined in the study as an ITO with no more than 400 program participants) are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other ITO.

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.

This assessment of the best way to deliver nutrition training is critical for gauging participation in potential nutrition education training and maximizing the effectiveness of training for ITOs. This study will reduce burden in the long term by helping to ensure that the training accounts for cultural and educational needs as well as infrastructural limitations of ITOs. FNS is asking for responses from the minimum number of ITOs required to maintain study and program integrity. ITO directors, FDPIR staff, and key stakeholders will be interviewed only once. Collecting the information less frequently would obstruct the agency's ability to assess the

exact nutrition training needs of ITOs, as well as the information needed to determine their interest in participating in such training.

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 3 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 special circumstances. This collection of information is conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 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.

A.8.a Federal Register notice and comments

Notice of this study was published in the *Federal Register* on July 19, 2016 (Volume 81, No. 138, pages 46887-46890). Three responses were received (Appendices D3.1, D3.2, and D3.3). The three comments included concern about how the paraprofessional training program will be developed. Specifically, there was concern with regarding whether or not FNS would be partnering with Tribes and ITO staff to determine how the paraprofessional program will be delivered, how the interviews will be conducted (i.e., in-person versus telephone). A comment also requested an expansion of the study to include interviews with recipients of FDPIR. None of the comments resulted in changes to any of the data collection instruments. FNS provided responses to the three comments (Appendices D4.1, D4.2, and D4.3).

A.8.b Consultations outside the agency

Staff members from FDD, representing several branches or offices (Nutrition Services and Access Branch, Policy Branch, and FDD Division Director's Office), attended the kickoff meeting for this project and provided feedback on research methods and approaches. Regional Food Distribution Offices that have in-depth knowledge of the topic areas studied the data collection materials and provided feedback on this information collection. Feedback from Regional Food Distribution Offices was critical, as Regional Offices deal directly with ITOs.

In addition, four respondents were consulted about the burden estimate and other characteristics of the collection (i.e., frequency, clarity of instructions): one ITO director, one FDPIR staff member, and two key stakeholders. Respondents in the pretest represented one of the following organizations: USDA FNS Special Nutrition Program–Midwest Regional Office; United Tribes Technical College; Pueblo of Zuni Food Distribution Program; and Seminole Nation of Oklahoma, Food and Nutrition Services Program. Contact information for these organizations is presented in Table A1.

Table A1. Contact Information for Organizations that Participated in Pretest

Organization Name	Address	Telephone Number	Year of Consultation
USDA FNS Special Nutrition Program - Midwest Regional Office	77 West Jackson Blvd 20th Floor Chicago, IL 60604-3507	312-353-6664	2016
United Tribes Technical College	3315 University Drive Bismarck, ND 58504	701-255-3285	2016
Pueblo of Zuni Food Distribution Program	103 7th Street, Black Rock, Zuni, NM 87327	505-782-2767	2016
Seminole Nation of Oklahoma, Food and Nutrition Services	P.O. Box 111 Seminole, OK 74868	405-382-3900	2016

In addition to soliciting comments from the public, Sarah Goodale from the National Agricultural Statistics Service (NASS) provided expert consultation on the availability of data, the sampling design, level of burden, and response rates for this collection. Contact information for the NASS representative is presented in Table A1 above. Appendix D2 presents the comments provided by NASS as well as the response.

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

The participants in the study will not receive an incentive payment.

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

While the findings will be in the public domain, information provided will not be disclosed to anyone but the analysts conducting this study. All electronic versions of the interview transcripts will be kept on the Contractor's secure server. Moreover, data from the interviews will be presented in aggregate form and, therefore, cannot be linked back to the response of any individual. Statements of anonymity and confidentiality, as well as requests for permission to record, will be read at the start of each interview, along with an introduction to the project (Appendix A3). To ensure that personal information remains private, the contract

executed between FNS and 2M Research Services, LLC requires that the Contractor create and keep data on secure networks and utilize data collectors that sign confidentiality agreements (Appendix A4) binding them to protect private information. The Contractor will assign a unique ID number to each respondent and provide the data to FNS by this ID number. A separate file will associate the ID number with personal information. The Contractor will keep this file private. Once the contract is over, the Contractor will destroy all the files containing private information.

Anonymity

Any identifying information mentioned in interviews will be omitted from the final transcript. Any names or other identifying information will not appear in the final transcript, nor will they be used in data analysis.

Telephone Interview Audio Recordings

Interview audio recordings in WebEx will not be shared with anyone outside of the study team, except as otherwise required by law, and will only be used to ensure the accuracy of transcription. After the transcriptions are complete, all recordings will be permanently deleted.

Cisco WebEx Meetings is a software-as-a-service (SaaS) solution delivered through the Cisco WebEx Cloud, a highly secure service-delivery platform. The recordings will be stored within the Cisco WebEx Cloud accessible through password protected URL links.¹⁷

¹⁷ Cisco. (2014). *Web conferencing: Unleash the power of secure, real-time collaboration*. Retrieved from: http://www.cisco.com/c/dam/assets/global/TW/offers/CMR/pdf/white_paper0108_en.pdf

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.

This study does not contain questions of a sensitive nature.

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.**

FNS has contacted four pretest respondents. FNS plans to contact an additional 95 SAs/ITOs. Out of this 95, approximately 61 respondents will go on to participate in the study in its entirety; 34 are considered non-respondents. We estimate 81.80 total annual burden hours (including burden imposed on the non-respondents and pretest respondents) and 502 total annual responses (including non-responses and pretest respondents). Appendix D1 and Table A2 show the estimates of the respondent burden for the proposed data collection. These estimates reflect consultations with program officials, the agency's prior experience in collecting data, and the pretesting of instruments and protocols. Table A2 also shows the estimated annualized cost to respondents. It has been calculated using average hourly earnings for May 2015 obtained from the Bureau of Labor Statistics' estimates for occupational and employment wages.¹⁸

¹⁸Bureau of Labor Statistics. (2016). *Occupational employment and wages: 2015*. Retrieved from http://www.bls.gov/oes/current/oes_stru.htm

Table A2. Estimates of Respondent Burden and Annualized Cost

Affected Public	Respondent Type	Data Collection Activity	Appendix ID	Sample Size	RESPONDENTS					NON-RESPONDENTS					Grand Total Burden Estimate (Hours)	Hourly Wage Rate	Total Annualized Cost of Respondent Burden	
					Estimated Number of Respondents	Frequency of Response	Total Annual Responses	Average Time per Response (Hours)	Total Annual Burden Estimate (Hours)	Estimated Number of Non-Respondents	Frequency of Non-Response	Total Annual Non-Responses	Average Time Per Non-Response (Hours)	Total Annual Burden Estimate (Hours)				
State, Local, or Tribal Agencies	FDPIR Directors	Pretest	B1;B2;C1	1	1	1	1	1.13	1.13	0	0	0	0.00	0.00	1.13	\$34.89	\$39.43	
		Pre-interview Email, 1	B1	36	14	1	14	0.05	0.72	22	1	22	0.02	0.43	1.15	\$34.89	\$40.19	
		Pre-interview Email, 2		22	4	1	4	0.05	0.22	17	1	17	0.02	0.35	0.56	\$34.89	\$19.59	
		Pre-interview Email, 3		17	3	1	3	0.05	0.17	14	1	14	0.02	0.28	0.45	\$34.89	\$15.68	
		Pre-interview Call, 1	B2	36	7	1	7	0.08	0.58	29	1	29	0.02	0.58	1.15	\$34.89	\$40.19	
		Interview Confirmation Email	B3	29	29	1	29	0.05	1.47	0	1	0	0.02	0.00	1.47	\$34.89	\$51.25	
		Interviews	C1	29	23	1	23	1.00	23.47	6	0	0	0.00	0.00	23.47	\$34.89	\$818.92	
		Post-interview Thank You Emails	B4	23	23	1	23	0.05	1.17	0	1	0	0.02	0.00	1.17	\$34.89	\$40.95	
	FDPIR Directors Subtotal				37	24	4	107	0.27	28.93	13	7	82	0.02	1.63	30.56		\$1,066.19
	FDPIR Staff	Pretest	B1;B2;C2	1	1	1	1	1.13	1.13	0	0	0	0.00	0.00	1.13	\$23.56	\$26.62	
		Pre-interview Email, 1	B1	36	14	1	14	0.05	0.72	22	1	22	0.02	0.43	1.15	\$23.56	\$27.14	
		Pre-interview Email, 2		22	4	1	4	0.05	0.22	17	1	17	0.02	0.35	0.56	\$23.56	\$13.23	
		Pre-interview Email, 3		17	3	1	3	0.05	0.13	15	1	15	0.02	0.29	0.42	\$23.56	\$9.97	
		Pre-interview Call, 1	B2	36	7	1	7	0.08	0.58	29	1	29	0.02	0.58	1.15	\$23.56	\$27.14	
		Interview Confirmation Email	B3	29	29	1	29	0.05	1.43	0	1	0	0.02	0.00	1.43	\$23.56	\$33.59	
		Interviews	C2	29	23	1	23	1.00	22.78	6	0	0	0.00	0.00	22.78	\$23.56	\$536.72	
		Post-interview Thank You Emails	B4	23	23	1	23	0.05	1.14	0	1	0	0.02	0.00	1.14	\$23.56	\$26.84	
	FDPIR Staff Subtotal				37	24	4	104	0.27	28.12	13	6	82	0.02	1.65	29.76		\$701.26
	Key Stakeholders	Pretest	B1;B2;C3	2	2	1	2	1.13	2.26	0	0	0	0.00	0.00	2.26	\$34.89	\$78.85	
		Pre-interview Email, 1	B1	23	6	1	6	0.05	0.29	17	1	17	0.02	0.35	0.63	\$34.89	\$22.07	
		Pre-interview Email, 2		17	4	1	4	0.05	0.22	13	1	13	0.02	0.26	0.47	\$34.89	\$16.55	
		Pre-interview Email, 3		13	3	1	3	0.05	0.16	10	1	10	0.02	0.19	0.36	\$34.89	\$12.41	
		Pre-interview Call, 1	B2	23	6	1	6	0.08	0.46	17	1	17	0.02	0.35	0.81	\$34.89	\$28.09	
		Interview Confirmation Email	B3	19	19	1	19	0.05	0.95	0	1	0	0.02	0.00	0.95	\$34.89	\$33.23	
		Interviews	C3	19	15	1	15	1.00	15.24	4	0	0	0.00	0.00	15.24	\$34.89	\$531.64	
		Post-interview Thank You Emails	B4	15	15	1	15	0.05	0.76	0	1	0	0.02	0.00	0.76	\$34.89	\$26.58	
	Key Stakeholders Subtotal				25	17	4	71	0.29	20.34	8	7	57	0.02	1.14	21.48		\$749.42
	Total				99	65	4	281	0.28	77.38	34	7	221	0.02	4.42	81.80		\$2,516.86
Footnote: The estimated number of non-respondents equals the number of respondents subtracted from the number of individuals initially contacted for participation.																		

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 other costs to respondents beyond those presented in section A.12.

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.

The total cost to the Federal Government is \$141,600. The annual cost to the Federal Government is \$70,800. The largest cost to the Federal Government is to pay a contractor \$140,912.94 over a 24-month period to conduct the study and deliver the report. This is based on an estimate of 1,268 hours, with a salary range of \$40.50–\$206.10/hour. This contract cost includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items. This information collection also assumes a total of 20 hours of Federal employee time: for a GS-13, step 1 at \$35.74 per hour, for a total of \$714.80 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2017.¹⁹

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 request for new data collection that will add 81.80 (rounded up to 82) total annual burden hours and 502 total annual responses to the FNS OMB burden inventory.

¹⁹19 Office of Personnel Management. (2017). *Salary Table 2017-GS*. Retrieved from: <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/20173/general-schedule/>

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

Data collection will begin 2 weeks following OMB approval and run for approximately 3 weeks. Interviews will be transcribed approximately in week 4 so that data analysis can begin in week 6. The draft report will be submitted by the Contractor to FNS 14 weeks after OMB approval, and presentation materials will be submitted 30 weeks after OMB approval.

There will be two products resulting from the analysis of data: A final report and a face-to-face briefing.

Table A3. Data Collection Schedule

Activity	Due Date
Contact emails/telephone calls sent to directors	2 weeks after OMB approval
Contact emails/ telephone calls sent to stakeholders	3 weeks after OMB approval
Contact emails/telephone calls to staff	4 weeks after OMB approval
Confirmation emails/telephone calls sent to directors	2 weeks after OMB approval
Confirmation emails/telephone calls sent to stakeholders	3 weeks after OMB approval
Confirmation emails/telephone calls sent to staff	4 weeks after OMB approval
Telephone calls to conduct interviews	2 weeks after OMB approval
Thank you emails sent to directors	3 weeks after OMB approval
Thank you emails sent to staff	4 weeks after OMB approval
Thank you emails sent to stakeholders	4 weeks after OMB approval
Data analysis	6 weeks after OMB approval
Reporting	14 weeks after OMB approval
Publication of findings	30 weeks after OMB approval

Once all 61 interviews are completed (not including the 4 pretest respondents), the interviews will be transcribed and rigorous qualitative analysis and coding of themes will begin. The 61 interviews will be broken into overarching subgroups: (1) 23 ITO directors, (2) 23 FDPIR staff, and (3) 15 key stakeholders. Multiple individuals will read through and code the

themes from each interview to ensure comprehensiveness and accuracy. A codebook will then be generated to further analyze themes using NVivo, a software program for qualitative data analysis. To substantiate themes developed for the codebook, data will also be auto-coded using text frequency and text search. Analyzed results will lead to the synthetization of some themes, when appropriate. Cross-cutting themes throughout the interviews, as well as themes grouped by question and subgroup, will be analyzed.

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.

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

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

This study does not require any exceptions to the Certificate for Paper Reduction Act (5 CFR 1320.9).