

**SUPPORTING STATEMENT - PART A for**

**OMB Control Number 0584-NEW:**

**Summer Meals Study**

**February 5, 2018**

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## 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. To address food insecurity and provide low-income families access to a healthy diet, the U.S. Department of Agriculture (USDA) administers 15 nutrition programs. These programs either provide cash benefits to purchase food for the family or serve meals directly in congregate settings. The two largest programs that provide meals directly to children are the National School Lunch Program (NSLP) and the School Breakfast Program (SBP); these programs provide meals to children attending schools during the regular academic school year. In 2016, these programs delivered free or reduced-price lunches to more than 22 million children, and free and reduced-price breakfasts to more than 12 million children every day (Food and Nutrition Service, 2016). Findings from multiple studies with varying methodologies and data sources are consistent in their support for the school meal programs — these programs reduce children’s food insecurity.<sup>1,2</sup>

Examining unmet food need in the summer months among children receiving free and reduced price meals during the school year, Nord and Romig (2006) found higher rates of household food insecurity when school was out for the summer.<sup>3</sup> USDA’s Summer Food Service Program (SFSP) and the NSLP’s Seamless Summer Option (SSO) help address the need for children’s access to nutrition assistance during the summer months. The SFSP and SSO,

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<sup>1</sup> Gundersen, C. B. Kreider, J. Pepper. The impact of the National School Lunch Program on child health: A nonparametric bounds analysis. *Journal of Econometrics*. 2012. 166(1): 79-91.

<sup>2</sup> Arteaga, I. and C. Heflin. Participation in the National School Lunch Program and food insecurity: An analysis of transitions into kindergarten. *Children and Youth Services Review*. 2014. 47(3): 224-230.

<sup>3</sup> Nord, M. and K. Romig. Hunger in the summer. *Journal of Children and Poverty*. 2006. 12(2): 141-158.

authorized under section 13(a) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1761(a)) (Appendix A1), provide free, nutritious meals and snacks to children at feeding sites located in low-income areas, and at sites in other areas serving a high proportion of low-income children, in the summer when school is not in session.

State administering agencies enter into agreements with program sponsors, including school food authorities (SFAs), local and tribal government agencies, and private nonprofit organizations to operate the programs.<sup>4</sup> Sponsors oversee one or more sites that serve free meals to children. Sites include schools, recreation centers, camps, and other locations where children congregate. To be eligible for SFSP or SSO, sites must be located in low-income areas where at least half of the children in the area are eligible for free or reduced price meals (as demonstrated through school or Census data), or serve predominantly low-income children. Any child or teen through the age of 18 may attend an “open” area-eligible site to receive a free meal. “Enrolled” or “closed” sites generally serve a specific, targeted low-income population of children and may or may not be in low-income areas.

Using data from the Current Population Survey, Nord and Romig (2006) compared food security among children during the school year to food security during the summer, and noted that food insecurity is higher in the summer than the regular school year. Similar analyses using the National Health and Nutrition Examination Study (NHANES) and the Early Childhood Longitudinal Study-Birth cohort confirm these findings (Gundersen, Kreider, and Pepper, 2012; Arteaga and Helfin, 2014). These consistent findings from three large-scale, national studies suggest that the school meal programs not only play a role in alleviating food insecurity among

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<sup>4</sup> SSO is operated exclusively by SFAs in the National School Lunch Program. All sponsor types, including SFAs, may operate SFSP. SSO provides streamlined administrative requirements, but lower reimbursement rates, for SFAs in NSLP.

households with children, but also highlight the struggle for families to find alternative sources of food for children during the summer.

Participation rates in the summer meal programs are much lower than in the NSLP/SBP, suggesting that the programs may not reach everyone who is eligible and may need food assistance. In July 2016, an average of 2.8 million children per day received meals through SFSP.<sup>5</sup> An additional 1 million children received free or reduced price lunches in NSLP that same month, some of which were lunches served through SSO.<sup>6 7</sup> This is far below the school-year free and reduced price participation level of more than 22 million children per day in School Year 2015-2016.<sup>8</sup>

There are several fundamental differences between SFSP/SSO and the NSLP and SBP that likely account for the lower participation rates. First and foremost, the NSLP and SBP are offered through schools where attendance is mandatory, thus ensuring access to all children. In contrast, the SFSP/SSO are provided through a variety of summer programs and delivery sites for which attendance is voluntary. Additionally, the NSLP/SBP are available in virtually every public school and many private schools, while the summer meal programs are accessible primarily in areas with high concentrations of low-income children.

The challenge for the SFSP/SSO is how to reach children in need cost-effectively. In a study released in 2003, Gordon and colleagues examined characteristics of SFSP sites and participants, program procedures, and meal compliance to gain insights on how to effectively expand program reach. At the time of the study in 2001, there were 31,304 sites serving about

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<sup>5</sup> FNS National Data Bank

<sup>6</sup> <https://fns-prod.azureedge.net/sites/default/files/datastatistics/keydata-may-2017.pdf>

<sup>7</sup> FNS does not collect separate program data for the SSO; it is reported as part of NSLP/SBP. The Food Research and Action Center estimates that 3.03 million children received meals daily through SFSP and SSO in July 2016.

<sup>8</sup>

2.2 million children each day. The program served primarily elementary-age children. Children were of diverse racial and ethnic backgrounds, the largest being African-American and White non-Hispanic. Almost half of programs were sponsored by SFAs and the vast majority were open to all children in the area of the site. Site setting varied widely, and included schools, day camps, housing projects, and playgrounds, among others.

The most recent study of summer meal programs—*Evaluation of the Summer Food Service Program Participant Characteristics* (OMB Control No. 0584-0595, Expiration Date 08/31/2016)—involved data collection from a nationally representative sample of States, sponsors, and site supervisors as well as a small number of participants (n=30) and nonparticipants (n=25) from the Washington D.C. metro area. The findings from the study will provide information on the characteristics of sponsors and sites that participate in the summer food service program as well as their perspectives on factors affecting children’s program participation.

The Summer Meals Study is an extension of the above study and it will provide a comprehensive, up-to-date understanding of sponsor, site, and child-level participation in the SFSP and SSO. FNS is particularly interested in learning where need may not be met, in order to increase access and participation in SFSP and SSO. Specifically, the study will examine children and their caregivers’ satisfaction with the program, ways in which FNS could better accommodate their needs, and why families living in eligible areas are not participating in the Summer Meal Programs. The study will also describe sponsors’ and sites’ meal service characteristics, the nutritional quality of the meals offered, as well as the activities the sites provide in an effort to determine how these factors influence children’s participation and satisfaction with the program. In addition, we will investigate the barriers and facilitators to

preparing and serving summer meals, and identify reasons former sponsors are no longer participating in the Summer Meal Programs. This is the first national study to simultaneously examine program characteristics (including meal quality) in relation to participation and satisfaction with the programs among households. The results of this study will be used to inform policy with the goal of increasing children's participation in the program and access to nutritious meals when school is not in session.

For studies of the Child Nutrition Programs, including SFSP and SSO, Section 28(c) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1769i) (Appendix A2) requires entities participating in the programs authorized under the Richard B. Russell National School Lunch Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771), to cooperate in the conduct of studies and evaluations.

## **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 *Summer Meals Study* will collect a broad range of data from a nationally representative sample of sites and their associated sponsors, as well as former sponsors, caregivers of participating and nonparticipating children, and participating and nonparticipating children and teens who live near the selected sites. This one-time data collection will primarily take place between May and November 2018.

The intent of the Summer Meals Study is to determine why children and their families participate in summer meal programs and their satisfaction with the programs. The study will also provide information on why children who are eligible for summer meals do not participate. This is the first study to provide a comprehensive picture of Summer Meal Program participants,

and it is the first to do this in conjunction with the systematic collection of meal quality data. These data are critical to developing program policy and guidance to ensure the program’s effectiveness. Appendix A3 presents the specific research questions and associated data collection instruments. The final study report will be shared publicly on the FNS website upon completion.

Table A2 - 1 lists the data collection instruments, the source of the information and the key information gathered by the instrument.

**Table A2 - 1. Instrument specification**

<b>Source</b>	<b>Instruments/mode</b>	<b>Key information</b>
Sponsors	<ul style="list-style-type: none"> <li>■ Web survey to confirm site operations with phone follow-up</li> <li>■ Web survey with phone follow-up</li> <li>■ Web survey and collection of site menus by email (for sponsors that conduct menu planning for their sites) with phone follow-up</li> <li>■ QIs with subgroup by phone</li> </ul>	<ul style="list-style-type: none"> <li>■ Food service characteristics</li> <li>■ Facilitators and barriers to program implementation</li> <li>■ Characteristics and content of menus</li> </ul>
Former sponsors	<ul style="list-style-type: none"> <li>■ QIs by phone</li> </ul>	<ul style="list-style-type: none"> <li>■ Facilitators and barriers to program participation and implementation</li> </ul>
Site Supervisors	<ul style="list-style-type: none"> <li>■ Web survey with phone follow-up</li> <li>■ Web survey and collection of site menus by email (for sites that conduct menu planning) with phone follow-up</li> <li>■ QIs with subgroup by phone</li> </ul>	<ul style="list-style-type: none"> <li>■ Food service characteristics</li> <li>■ Facilitators and barriers to program implementation</li> <li>■ Characteristics and content of menus</li> </ul>
Caregivers of participants	<ul style="list-style-type: none"> <li>■ Web or phone Household Eligibility Screener</li> <li>■ Web or mail survey with phone follow-up*</li> <li>■ QIs with subgroup by phone</li> </ul>	<ul style="list-style-type: none"> <li>■ Eligibility for survey</li> <li>■ Characteristics</li> <li>■ Reasons for participation</li> <li>■ Satisfaction with site characteristics</li> <li>■ Satisfaction with meals</li> </ul>

<b>Source</b>	<b>Instruments/mode</b>	<b>Key information</b>
Child participants	<ul style="list-style-type: none"> <li>■ Web or mail survey included as part of caregiver’s survey</li> </ul>	<ul style="list-style-type: none"> <li>■ Meal appeal and satisfaction</li> </ul>
Teen participants	<ul style="list-style-type: none"> <li>■ Web or mail survey included as part of caregiver’s survey**</li> </ul>	<ul style="list-style-type: none"> <li>■ Meal appeal and satisfaction</li> <li>■ Satisfaction with site characteristics</li> </ul>
Caregivers of nonparticipants	<ul style="list-style-type: none"> <li>■ Web or phone Household Eligibility Screener</li> <li>■ Web or mail survey with phone follow-up*</li> <li>■ QIs with subgroup by phone</li> </ul>	<ul style="list-style-type: none"> <li>■ Eligibility for survey</li> <li>■ Reasons for nonparticipation</li> </ul>
Teen nonparticipants	<ul style="list-style-type: none"> <li>■ Web or mail survey included as part of caregiver’s survey**</li> </ul>	<ul style="list-style-type: none"> <li>■ Reasons for nonparticipation</li> </ul>

\*There is one integrated Caregiver Survey with separate sections for caregivers of participants and nonparticipants, and questions common to both  
\*\*There is one integrated Teen Survey with skip patterns to capture information from participants and nonparticipants

In the following sections, we describe the data being collected, from whom and how we will collect it, and the recruitment procedures. More detailed information on sampling and data collection is available in Part B of this supporting statement.

### **Supplemental Nutrition Assistance Program (SNAP) Administrative Data**

We will request administrative data from SNAP State agencies in the sampled States to help establish the participant and nonparticipant sampling frames for the study. The SNAP administrative data will consist of names and contact information for households with children 18 years of age and under participating in SNAP as of December 1, 2017. This will be used along with U.S. postal address data for defined areas around the sampled sites, to identify households with children who are eligible and may or may not participate in SFSP/SSO at the sampled site. One week after OMB approval, we will send SNAP State agencies an Email Requesting SNAP Administrative Data (Appendix B1). Two weeks after OMB approval, we will

send a Reminder Email Requesting SNAP Administrative Data (Appendix B2) to State agencies that do not respond to the initial email. When the data are received, we will send a Thank You Email Upon Receipt of SNAP Administrative Data (Appendix B3).

### **Site and Sponsor Lists for SFSP and SSO**

To establish the site sampling frame, we will request lists of SFSP and SSO sites and sponsors from State agencies<sup>9</sup> that administer these programs in the sampled States at three points in time. The lists will include sites and sponsors operating the program, contact information for each, site type (open vs. closed), and dates of operation for the site. The first list will be used to draw the initial sample of sites that operated in Summer 2017. The second list, collected as of June 1, 2018, will be used to select a sample of sites new to the program in 2018 (in addition to those that also operated in 2017). At the end of Summer 2018, we will request a final list of sites and sponsors in 2018 to ensure the new 2018 sites in the study are representative of all sites in 2018.

One week after OMB approval, we will send the State agencies an Email Requesting SFSP and SSO Site and Sponsor List(s) (Appendix C1) to request the first list of sites and sponsors. Two weeks after OMB approval, we will send a Reminder Email Requesting SFSP and SSO Site and Sponsor List(s) (Appendix C2) to all States that do not respond to the initial email. When each list is received, we will send the State agency the Thank You Email Upon Receipt of the SFSP and SSO Site and Sponsor List(s) (Appendix C3). Once the sites and sponsors are sampled, estimated to occur within 6 weeks of OMB approval, we will email the State agencies of the sites and sponsors selected for the study using the Notification of Sampled Sites and Sponsors (Appendix C4).

### **Recruitment of Sponsors and Site Supervisors**

<sup>9</sup> In some States, SFSP and SSO are administered by two different State agencies.

After the initial site sample of sites that participated in Summer 2017 is selected, we will identify their associated sponsors. FNS will send these sponsors of the selected sites a Sponsor Informational Email from FNS (Appendix D1) and an attached Study Brochure (Appendix D25) approximately 9 weeks after OMB approval to inform them of the study and encourage their participation. Ten weeks after OMB approval, the study team will begin recruitment of sponsors by sending them an Email with Link to Site Operations Survey (Appendix D2), with the attached Study Brochure (Appendix D25). The web-based Site Operations Survey (Appendix D5) asks sponsors whether the sampled site(s) under their sponsorship plan to continue to operate in Summer 2018. If they will operate, the survey confirms contact information for the site supervisor, obtains dates of operation for the site, obtains contact information for the site's menu planner and whether the site uses cycle menus. The Site Operations Survey also asks the sponsor to report whether the site supervisor requires Spanish study materials, and whether site participants need Spanish materials. The information collected will help us finalize the site sample for the study and set up future communications about the study with the appropriate contacts. We will send a Reminder Email to Complete the Site Operations Survey (Appendix D3) and conduct telephone follow-up with nonrespondents to complete the survey using the Telephone Script to Complete Site Operations Survey (Appendix D4), beginning 11 weeks after OMB approval.

If sponsors complete the Site Operations Survey (Appendix D5) and indicate one or more of their sampled sites will participate in Summer 2018, beginning 11 weeks after OMB approval, we will send the sponsors the Email with Link to Informational Study Recording for Sponsors and Request to Email Sites (Appendix D6), with an attached Study Email from Sponsors to Site Supervisors (Appendix D7) for sponsors to communicate about the study with their sampled

sites. The Informational Study Recording for Sponsors (Appendix D8) is a series of slides read aloud and contains a general overview of the surveys that sponsors and sites will be asked to complete, and the study timeline. At the end of the recording, sponsors and sites will be asked to check a box to affirm their participation in the study, with an assurance included that information provided through the study will be kept private as required by law. Beginning 12 weeks after OMB approval, we will send the Reminder Email with Link to Informational Study Recording for Sponsors (Appendix D9) to nonrespondents. Thirteen weeks after OMB approval, we will contact nonrespondents by telephone using the Telephone Script to Complete Informational Study Recording for Sponsors (Appendix D10) to provide study information to sponsors and affirm their participation in the study.

Recruitment of sites that are confirmed as participating in Summer 2018 by their sponsors will start beginning 12 weeks after OMB approval by sending them an Email with Link to Informational Study Recording for Site Supervisors (Appendix E1). The Informational Study Recording for Site Supervisors (Appendix E2) contains a general overview of the support needed from sites, the survey materials they will be asked to complete, and a box to affirm their participation in the study. Beginning 13 weeks after OMB approval, we will send the Reminder Email with Link to Informational Study Recording for Site Supervisors (Appendix E3) to nonrespondents. Fourteen weeks after OMB approval, we will contact nonrespondents by telephone using the Telephone Script to Complete Informational Study Recording for Site Supervisors (Appendix E4) to provide information about the study and affirm study participation by site supervisors.

Following confirmation that a *closed* site agrees to participate in the study, beginning 14 weeks after OMB approval, we will send the site supervisors an Email Requesting Roster of

Children from Closed Sites (Appendix E5) asking them to send a roster of children enrolled at the site, including first and last name, mailing address of child’s caregiver, and email/phone for child’s caregiver. If the site supervisors are able to provide caregiver addresses, the rosters will be used to mail surveys to some of the caregivers of children who attend the site. For rosters without addresses, we will send the site supervisor a number of surveys to distribute to children to take home to their caregivers for completion. Site supervisors will be able to send the rosters to the secure FTP site or mail a hard copy. If they want to mail a hard copy, we will provide mailing instructions and a certified mail (tracked) envelope to help ensure privacy of the information. Beginning 15 weeks after OMB approval, we will send a Reminder Email Requesting the Roster (Appendix E6) to nonrespondents. Beginning 16 weeks after OMB approval, we will call nonrespondents using the Telephone Script to Request the Roster (Appendix E7) to encourage them to submit the rosters electronically or via secure mail. If they prefer, we can also collect the rosters over the phone.

The same procedures will be used to recruit “new” 2018 sponsors and sites selected for the study based on the second list of new sites provided by State agencies.

### **Sponsor Survey**

Beginning 18 weeks after OMB approval, SFSP and SSO sponsors in the study will complete the Sponsor Survey (Appendix D13), which gathers information about sponsor characteristics, sponsor policies for food safety and special dietary needs, facilitators and barriers to program implementation, and operations of the sponsored site. Sponsors of sampled sites will be sent the Email with Link to Sponsor or Site Supervisor Survey (Appendix D11) within a week of program launch at a given site during the summer, which will invite them to complete the web-based survey. A Reminder Email with Link to Sponsor or Site Supervisor Survey

(Appendix D12) will be sent to nonrespondents beginning 20 weeks after OMB approval, and we will conduct telephone follow-up with nonrespondents beginning 22 weeks after OMB approval to complete the survey using the Telephone Script to Complete the Sponsor or Site Supervisor Survey (Appendix D14), as needed. Nonrespondents reached by phone will be asked to complete the survey over the phone with the interviewer or complete it on the web. If they agree to complete it over the phone, the telephone interviewer will enter survey data into the same web-based instrument used by other study participants.

### **Site Supervisor Survey**

The Site Supervisor Survey (Appendix E9) obtains information on site and meal service characteristics, participant demographics, site purpose, length of operations, facilitators and barriers to program implementation, site equipment, and storage capacity. The Site Supervisor Survey data collection activities will follow data collection procedures similar to the Sponsor Survey. Like sponsors, beginning 18 weeks after OMB approval, site supervisors will be sent the Email with Link to Sponsor or Site Supervisor Survey (Appendix D11) and invited to complete the web-based survey. They will be sent the Reminder Email with link to Sponsor or Site Supervisor Survey (Appendix D12) as needed 20 weeks after OMB approval, and then we will conduct telephone follow-up with nonrespondents to complete the survey using the Telephone Script to Complete the Sponsor or Site Supervisor Survey (Appendix D14), 22 weeks after OMB approval.

### **Menu Planning Survey and Site Menus**

The entity, either sponsor or site supervisor, identified during sponsor recruitment as primarily responsible for menu planning for the sampled site will complete the Menu Planning Survey (Appendix F1) and provide site menus. The web-based Menu Planning Survey obtains

information on the role of sponsors and sites in menu planning and factors that influence that role, along with meal planning resources used and needed. For site menus, respondents will be asked to upload complete and detailed menus, including any recipes used, for all foods and beverages offered for two weeks selected at random by the study team.<sup>10</sup>

Approximately one week prior to the first week selected to provide site menus (the “first target week”), beginning approximately 18 weeks after OMB approval, we will send the Email with Link to Menu Planning Survey and Request for Site Menus (Appendix F2) to the sponsor/site supervisor asking them to complete the Menu Planning Survey. It will also provide advance notice of the two weeks selected for data collection of site menus and instruct them to send the menus following completion of each selected week. On the last day of the first target week, beginning 19 weeks after OMB approval, we will send a Reminder Email to Complete Menu Planning Survey and Submit First Week of Site Menus (Appendix F3), which will indicate that the study team will follow up by phone to collect the data if they do not respond within one week. One week later, beginning 20 weeks after OMB approval, the study team will call nonrespondents to complete the Menu Planning Survey and record site menu details for the first target week over the phone using the Telephone Script to Complete Menu Planning Survey and First Week Site Menus (Appendix F4). Sponsors/site supervisors reached by phone will be asked whether they would like to complete the survey or provide the site menus electronically or with the telephone interviewer over the phone. Similar procedures will be followed for the “second target week” selected to provide site menus (Appendices F5, D17, and F7).

The Site Menu Follow-Up Report (Appendix F9) will be generated and emailed to the sponsor or site using the Email to Submit Site Menu Follow-Up Report (Appendix F8) within two weeks of receipt of each week of menus based on the study team’s review of the menus

<sup>10</sup> Note that if the site only operates for one week, that single week will be the only week sampled.

provided for the sites, beginning 21 weeks after OMB approval. The Site Menu Follow-Up Report will request details for menu items that were not provided on the initial submission of menus (e.g., type of bread, whole wheat/white; missing portion sizes, etc.) in order to obtain complete menu information. One week after sending the Site Menu Follow-Up Report, beginning 22 weeks after OMB approval, we will send a Reminder Email to Submit the Site Menu Follow-Up Report (Appendix F10), which will indicate the study team will follow up by phone to collect the data if they do not respond within one week. One week later, beginning 23 weeks after OMB approval, the study team will call nonrespondents to record the missing site menu details using the Telephone Script to Complete the Site Menu Follow-Up Report (Appendix F11). We will send a Study Thank You Email (Current Sponsors and Sites) (Appendix D23) to respondents once they have completed the last required study activity.

### **Recruitment of Households**

The participant and nonparticipant samples are drawn from three sources: (1) State SNAP caseload data for households with children in areas around the sampled sites; (2) U.S. postal address data for all households in areas around the sampled sites; and (3) Caregiver Surveys for participants distributed to children and teens who attend the sites (“the onsite sample”).

We will mail a Household Screener Invitation Letter (Appendix G1) with a Study Brochure in English and Spanish (Appendix D25) to households in the SNAP and postal address frames requesting that they complete a household eligibility screener, 18 weeks after OMB approval. The Household Eligibility Screener (Appendix G2), which may be completed via web or telephone and in English or Spanish, will identify eligible participants and nonparticipants based on the presence of children 18 years of age and under in the household and SFSP/SSO

participation by those children at the sampled site geographically closest to their homes. The screener will remove from the sample any respondents that indicate their children attend another site where free meals are served that is not included in the study.

Respondents deemed eligible to participate in the study by the Household Eligibility Screener will have the option to immediately complete via web the Caregiver Survey (Appendix G7). If they prefer a hard copy, we will mail the appropriate survey with an Invitation Letter for Mailed Surveys (Appendix G3) and include a postage-paid business reply envelope for returning completed surveys, beginning 19 weeks after OMB approval.

Two weeks later, 21 weeks after OMB approval, we will send a Reminder Postcard to Eligible Caregivers (Appendix G4) to all caregivers of participants and nonparticipants. For caregivers who indicated a preference to respond by web, we will mail them a hard copy survey one week following the mailing of the Reminder Postcard (22 weeks after OMB approval), using the Invitation Letter for Mailed Surveys (Appendix G3). Nonrespondents will receive a second Reminder Postcard (Appendix G4) the following week, 23 weeks after OMB approval. We will call non-respondents to the Caregiver Survey to request that they complete the survey via phone, using the Telephone Follow-Up Script for Caregivers (Appendix G6) beginning 24 weeks after OMB approval, until sample size targets are reached. We will also ask that they include their children so we receive responses to both caregiver and child/teen surveys. Telephone interviewers who obtain caregiver responses over the phone will enter survey data into the same web-based instrument used by other study participants.

For the onsite sample of participants, each site supervisor of a sampled site will be asked to distribute a hard-copy version of the Caregiver Survey (Appendix G7) with an Invitation Letter to Onsite Participants (Open and Closed Sites) (Appendix G5) and a Study Brochure

(Appendix D25) to a pre-selected number of children to give to their parents/caregivers.

Distribution will be tied to each site's dates of operation and will begin 19 weeks after OMB approval. There will be instructions on the hard-copy Invitation Letter to access the survey via web, if desired. All materials will be in sealed envelope. No follow-up will be conducted with the onsite sample, as we will not have contact information for the recipients of these surveys.

### **Caregiver Survey**

There will be one integrated Caregiver Survey (Appendix G7), completed via web or in hard copy, that will include separate sections with questions relevant to caregivers of participants and caregivers of nonparticipants, as well as sections that all caregivers will complete. For participants, the Caregiver Survey will ask about reasons for participating in the summer meals program; facilitators and barriers to attendance; strategies to improve attendance; and meal appeal and satisfaction. Sections specific to nonparticipants will capture information on reasons for not participating in the summer meals program and what would facilitate future participation. The Caregiver Survey will collect demographic characteristics and food security status questions of all respondents. See Appendix A3 for additional details on questions in the Caregiver Survey and the associated research questions.

### **Child Participant Survey/Teen Participant Survey/Teen Nonparticipant Survey**

The Child Participant Survey is targeted to children aged 5 to 12; while the Teen Survey is for those aged 13 to 18.<sup>11</sup> These surveys will be integrated into the caregiver surveys and caregivers will be asked to assist their children in completing the survey, if needed. The Child Participant Survey (Appendix G8) was developed using best practices, such as plain language to ensure comprehension. The Teen Survey (Appendix G9) covers both teen participants and teen nonparticipants, with routing to target questions appropriately. The Teen Survey includes

<sup>11</sup> The age grouping (5 to 12 and 13 to 18) is similar to that used in national studies such as NHANES.

questions regarding awareness of the SFSP/SSO; best ways to provide program information; reasons for participation or nonparticipation; and barriers and facilitators to participation. Teen participants are also asked about meal appeal and satisfaction and factors affecting appeal and satisfaction.

Upon receipt of completed surveys from caregivers and their children/teens, beginning 20 weeks after OMB approval, we will mail the Study Thank You With Incentive (All Caregivers) (Appendix G10) to provide them the \$10 cash or Visa gift card incentive and thank them for their input on the surveys.

## **Qualitative Interviews**

Qualitative interviews will be conducted via telephone with a subset of: (1) current sponsors; (2) site supervisors; (3) former sponsors; (4) caregivers of participants; and (5) caregivers of nonparticipants (See Appendix A3).

### ***Site Supervisors and Sponsors***

The telephone Site Supervisor Key Informant Interview Discussion Guide (Appendix E10) and Sponsor Key Informant Interview Discussion Guide (Appendix D21) will delve into information and nuances difficult to achieve from surveys, including more information on how sponsors provide information about the programs to caregivers; challenges in planning and preparing healthy meals; reasons behind meal planning decisions and strategies; and the broader facilitators and barriers in providing SFSP/SSO services. The Former Sponsor Key Informant Interview Discussion Guide (Appendix D22) will provide information on why former sponsors

are no longer participating in SFSP/SSO, as well as the broader facilitators and barriers in providing the programs. These open-ended interviews include follow-up probes, with questions formulated with flexibility in mind.

Current sponsors and site supervisors may indicate a willingness to participate in the qualitative interviews at the end of their respective survey instruments. From the list of willing sponsors and site supervisors, we will select respondents for the qualitative interviews to ensure that we include respondents from all types of sponsors (i.e., SFA, government, nonprofit) and sites (open/closed, SSO/SFSP, school/other, etc.). Former sponsors will be selected to represent both SFSP and SSO, and different site types, using 2017 and 2018 site and sponsor lists obtained from State agencies.

To schedule the qualitative interviews, we will send an Email Invitation for Key Informant Interview (Current Sponsors and Sites) (Appendix D15) to the selected site supervisor or sponsor requesting that they participate, 24 weeks after OMB approval for the sponsors and sites selected as described above based on their completion of the surveys by that time. We will send a Reminder Email Invitation for Key Informant Interview (Current Sponsors and Sites) ((Appendix D16) to nonrespondents 25 weeks after OMB approval, and a Confirmation Email for Key Informant Interview (Current Sponsors and Sites) (Appendix D17) beginning 24 weeks after OMB approval to those who agree to be interviewed. Once the interviews are completed, we will send a Study Thank You Email (Current Sponsors and Sites) (Appendix D23) to those who participate, beginning 26 weeks after OMB approval. The same process will be repeated, beginning 30 weeks after OMB approval, to schedule interviews for sponsors and sites who complete surveys later in the summer.

The same procedures will be used to schedule the qualitative interviews of former sponsors (Appendices D18, D19, D20, and D24), beginning 30 weeks after OMB approval.

### ***Caregivers of Participants and Nonparticipants***

Qualitative interviews of caregivers will be conducted by telephone using the Participant Caregiver Key Informant Interview Discussion Guide (Appendix G12) and Nonparticipant Caregiver Key Informant Interview Discussion Guide (Appendix G13). These interviews will focus on understanding the reasons caregivers support their children's participation in SFSP/SSO or why they do not attend, how frequently their children attend, and program satisfaction, with probes into how decisions about participation are made, deterrents to participation, and perceptions of the program. These open-ended interviews include follow-up probes, with questions formulated with flexibility in mind.

Caregivers can indicate a willingness to participate in the qualitative interviews at the end of the survey instrument. From the list of interested caregivers of participants and nonparticipants, we will select respondents for the qualitative interviews to achieve diversity in the ages of children/teens who participate or are in the household; the types of sites they attend or are closest to their residence (i.e., the sampled site); and levels of satisfaction with the program based on survey results. To schedule the interviews, we will call these caregivers using the Telephone Script to Schedule Caregiver Key Informant Interview (Appendix G11), beginning 24 weeks after OMB approval with caregivers who completed the surveys at that point in time. Upon completion of the qualitative interviews with caregivers, we will mail the Key Informant Interview Thank You with Incentive (Caregivers) (Appendix G14) to provide them the \$20 cash or Visa gift card incentive and thank them for their participation in the study, beginning

26 weeks after OMB approval. The same process will be repeated, beginning 30 weeks after OMB approval, to schedule interviews for caregivers who complete surveys later in the summer.

### **Pretesting**

In preparation for study launch, study instruments were pre-tested under approved Generic OMB Clearance (OMB Control No. 0584-0606, Expiration date 03/31/2019). The primary objective of the pretest was to ensure that the instruments were clear and understandable to respondents. Specific pretest objectives included identifying problems related to communicating intent or meaning of questions and concepts; determining whether respondents could accurately provide the information requested; and assessing the adequacy of the range of responses. Pretests were conducted with respondents from the target population for each instrument (e.g., sponsors, site supervisors, caregivers of participants, teens, etc.). In total, 64 interviews were conducted across 52 respondents. The pretest interview protocols may be found in Appendix H.

Several revisions were made to draft instruments as a result of the pretests, including:

- Adding reference to site address to improve recognition of the sampled site
- For sponsor and site materials, emphasizing summer meals since some organizations provide year-round meal service
- Defining summer program in caregiver materials
- Specifying that menu output from USDA-approved nutrient analysis software is acceptable
- Simplifying and standardizing response options, and reducing the number of responses offered in long lists

- Removing question and response option grids for household and child/teen surveys whenever possible
- Combining the participant caregiver and nonparticipant caregiver surveys to create a single caregiver survey with common questions for both respondents, and skip instructions for sections relevant only to participant caregivers or nonparticipant caregivers
- Combining the teen participant and teen nonparticipant surveys into a single teen survey with skip patterns to direct respondents based on their participation status.

### **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 complying with the E-Government Act of 2002. Respondent burden will be reduced through use of information technology for data collection. The following study surveys will be web-based. The web-based versions are currently under development. Screen shot of the first page of the web surveys can be found in Appendices D5a, D13a, E9a, F1a, G2a, G7a, G8a, and G9a.

- Site Operations Survey (Appendix D5)
- Sponsor Survey (Appendix D13)
- Site Supervisor Survey (Appendix E9)
- Menu Planning Survey (Appendix F1)
- Household Eligibility Screener (Appendix G2)
- Caregiver Survey (Appendix G7),
- Child Participant Survey (Appendix G8)
- Teen Survey (Appendix G9)<sup>12</sup>

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<sup>12</sup> Some Caregiver and Child/Teen Participant Surveys will be distributed to participants in hard copy at the sampled site. The letter accompanying these surveys will provide an option for respondents to complete the surveys via web if desired.

See Table A3 - 1 for the number of electronic responses by survey. We estimate that 88 percent of all responses to the Sponsor Survey, Site Supervisor Survey and Menu Planning Survey will be collected electronically, with the remaining 12 percent collected by the study team over the phone.

We estimate about 80 percent of all Caregiver responses will be collected electronically, with the remaining 20 percent submitted in hard copy or collected by the study team via phone.

**Table A3 - 1. Electronic Survey Responses**

	N responding by phone	N responding by web	TOTAL
Site operations survey	72	468	540
Sponsor Survey	55	426	481
Site Supervisor Survey	107	643	750
Eligibility Screener	4,584	18,334	22,918
Caregiver Surveys	876	5,924	6,800
Menu Planning Survey	79	491	570

To provide sponsors and site supervisors with information about the study procedures and timeline, we will email them a link to an Informational Study Recording for Sponsors (Appendix D8) and an Informational Study Recording for Site Supervisors (Appendix E2) on the study protocols they can review and affirm their participation in the study.

**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.**

There is no similar information collection. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements. FNS solely administers the SFSP and SSO. The information required for this study is not currently reported to FNS on a regular basis in a standardized form or available from any other previous, contemporary study.

## **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.**

Some of the sponsors and sites selected for the study are small businesses or other small entities. The requested information is being held to the minimum required to address the research questions. Although some sites and sponsors are smaller in their program scope, they deliver the same program benefits and perform the same functions as the larger sponsors and sites. Thus, they maintain the same type of information. FNS estimates that 10 percent of them will be small entities.

To reduce burden on these small entities, we will incorporate options for the mode used to collect surveys and offer significant technical assistance. We will make survey instruments available in web-based form or over the phone, and for the site menus, we will offer participants the option of submitting materials via uploading to a secure File Transfer Protocol (FTP) site, faxing, emailing, mailing via U.S. mail with a prepaid self-addressed envelope, or completing by telephone. We will assign a study team member to each sponsor or site to assist with the required data collection for the site menus and Site Menu Follow-Up Report (Appendices F2 through F11).

## **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 voluntary one-time data collection activity. If this information collection is not conducted, FNS will not have information on the barriers and facilitators to program operation, characteristics of participants and nonparticipants, and meal characteristics and nutritional

content. The data obtained through the study will help FNS to better meet the needs of children eligible for summer meals.

#### **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:**

- **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. The collection of information is conducted in a manner consistent with the guidelines of 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.**

In accordance with 5 CFR 1320.8(d), FNS published a notice on August 22, 2017, in the *Federal Register*, Volume 82, Number 161, pages 39,750-39,757, and provided a 60-day period for public comments. FNS received a total of 15 comments, which are provided in Appendices I1 through I15. Appendix J includes FNS's responses to the comments.

Commenters acknowledged the importance of the summer meal programs and generally expressed support for the *Summer Meals Study*. Several commenters highlighted specific challenges or barriers in implementing the summer meals programs, based on their own experiences operating the programs or in administering or promoting the programs. These included challenges such as cost, menu variety, transportation, marketing, outreach, congregate meal service, adult meals and program staffing. A couple of the commenters expressed concern about study burden for program operators who are already very busy. One commenter wanted to ensure that the study is launched during summer operations so that even short-duration sites may participate. Finally, a few commenters suggested topics for the study which were already addressed through the *Summer Food Service Program Characteristics Study*.

In responding to the comments, FNS provided commenters additional background on the study in the context of the specific issues raised. To address burden and timing concerns, FNS assured commenters that we are working to ensure burden is minimized, that there will be multiple modes to complete study instruments, and that the study will be launched when sites are operating. Commenters who suggested the collection of data on topics already in the *SFSP Characteristics Study* were informed about that study and when results will be publicly available. In addition, we reviewed the study instruments to ensure that challenges identified by

commenters were included. As a result, several additional questions and response options were added to reflect commenter input.

In addition to the public input on the Notice, the study team identified program stakeholders from State and local agencies and the advocacy community to serve as advisors to the study (see Table A8 - 1). Consultations about the research design, sample design, data sources and needs, and study reports occurred during the study’s planning and design phase, and will continue throughout the study.

**Table A8 - 1. Program Stakeholders Serving as Study Advisors**

<b>Name</b>	<b>Affiliation</b>	<b>Email Address</b>
Caroline Cooke	Connecticut Department of Education	Caroline.Cooke@CT.gov
Walt May	Utah Food Bank (sponsor)	waltn@utahfoodbank.org
Keven Vicknair	Equal Heart (TX) (sponsor)	keven@equalheart.org
Crystal FitzSimons	Food Research and Action Center (FRAC)	CFitzSimons@frac.org

An additional consultant was Edwin Anderson, with the National Agricultural Statistical Service’s Summary, Estimation, and Disclosure Methodology Branch, 202-690-0270.

**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.**

Since sponsors and site supervisors generally respond at higher rates due to the program requirement in Section 28(c) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1769i) (Appendix A2) to cooperate with studies and evaluations, FNS is not requesting any incentives for their participation in this study.

FNS is requesting incentives for caregivers of participants and nonparticipants who participate in the study. The post-participation (survey completion) financial incentives are to increase sample representativeness, decrease non-response bias, increase survey response rates, and gain efficiency in data collection. The bulk of the data collection for this study must be

completed in a compressed window between May and November 2018. Ideally, most of the data collection from caregivers and their children will occur during or soon after the end of summer site operations, so it is critical to reach caregivers in an efficient manner.

Based on the empirical evidence from comparable respondents (summarized below), FNS is requesting that caregivers of participants and nonparticipants in the *Summer Meals Study* receive incentives of \$10 in the form of cash or Visa gift card, after receipt of the completed caregiver surveys (Appendix G7). The survey incentives will be offered to all respondents as they are all expected to be low-income and less likely to participate in research studies. The child/teen surveys are integrated into the caregiver surveys and will not receive a separate incentive. Caregivers of participants and nonparticipants selected to participate in the qualitative interviews will receive an additional \$20 in cash or Visa gift card after completing the telephone interview. Respondents will be given the choice of receiving their incentive in the form of cash or Visa gift card, which will result in empirical support for the type of incentive this study population prefers.

### **Survey Incentives Improve Sample Representativeness and Reduce Non-Response Bias**

Providing survey participants with a monetary incentive reduces non-response bias and improves survey representativeness, especially in populations defined as being in poverty.<sup>13,14,15,16</sup>

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<sup>13</sup> 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.

<sup>14</sup> 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.

<sup>15</sup> Groves R, Fowler F, Couper M, Lepkowski J, Singer E. (2009) in: Survey methodology. John Wiley & Sons, pp 205-206.

<sup>16</sup> Singer E. (2002).

<sup>17</sup> Specifically, incentives can improve sample representativeness and reduce non-response bias.<sup>18,19</sup> by encouraging those less interested in research to participate,<sup>20</sup> including low-income respondents.<sup>21</sup> Several studies provide evidence that offering incentives may improve representation for low-education, low-income, and ethnic minority subgroups. Response rates among minorities and those with low education are generally lower for all types of surveys, especially those conducted by mail. For example, in a national probability sample mail survey for the National Cancer Institute conducted by Westat, the sample is divided into two strata (1) high minority and (2) low minority. The response rate to the high minority strata is 12 percentage points below the low minority strata (23% vs. 35%).<sup>22</sup> Similarly, when testing within household selection procedures, Olson, et al (2014) found that all procedures lead to under-representing non-whites, Hispanics, those with lower education and those in the lowest income groups.<sup>23</sup>

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<sup>17</sup> 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.

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

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

<sup>20</sup> 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

<sup>21</sup> 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.

<sup>22</sup> Westat (2017) *Health Information National Trends Survey 5 (HINTS 5), Cycle 1 Methodology Report*. Prepared for the National Institute, Bethesda Maryland. <https://hints.cancer.gov/data/methodology-reports.aspx>

<sup>23</sup> Olson, K., Stange, M. and J. Smyth (2014) Assessing within-household selection methods in household mail surveys. *Public Opinion Quarterly* 78: 656-678.

The population of interest in the current study is comparable to the populations discussed above. Specifically, the current study will be recruiting households that live within the catchment area of SFSP/SSO sites, which are eligible to operate primarily in areas where the free and reduced price lunch population is at least 50 percent (i.e.,  $\geq 185$  percent of poverty).

### **Survey Incentives Increase Survey Response Rates and Gain Efficiency in Data Collection**

Incentives also improve survey response rates and increase efficiency in data collection. Having an adequate number of completed surveys is essential to detect statistically significant differences between the subpopulations of interest in this study (e.g., households participating and not participating in summer meal programs, households above and below the federal poverty thresholds). In addition, incentives are an essential component of the multi-pronged approaches used to minimize non-response bias in the current study (e.g., reminder mailings, multiple survey modes, telephone follow up). Incentives are especially important for households less likely to respond, such as the households being recruiting in the current study (e.g., low-income households with children, those residing in rural areas, and those receiving federal nutrition assistance benefits). Given the short study window, it is expected that an incentive will encourage a faster response among the population being recruited for this study. Indeed, incentives reduce efforts to recruit low-income study participants and lower overall survey costs and time to achieve completion rates without affecting data quality.<sup>24,25</sup>

In a meta-analysis<sup>26</sup>, Mercer and colleagues estimated an improvement of 5 percentage points for surveys that promised \$10 compared to no incentive. Importantly, Frederickson et al.

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<sup>24</sup> Dillman, Don. 2000. *Mail and Internet Surveys: The Tailored Design Method, 2<sup>nd</sup> Edition*. John Wiley & Sons: New York.

<sup>25</sup> Singer, Eleanor. 2006. "Introduction: Nonresponse Bias in Household Surveys," *Public Opinion Quarterly*, 70(5): 637-645.

<sup>26</sup> 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.

(2005)<sup>27</sup> found a \$10 contingent incentive to increase responses by 20 percentage points among Medicaid recipients, a similar population to those being recruited in this study. Children's eligibility for Medicaid is at least 133 percent of the Federal Poverty Level (FPL), higher in many states, while children in families earning up to 130 percent of the FPL are eligible for free school lunches. Given that SFSP sites operate in areas where 50 percent or more of the households qualify for free or reduced price school meals, there is strong overlap between the populations of this study and that of the Frederickson study.

Based on the empirical evidence above and the compressed data collection schedule, FNS feels strongly that the proposed incentives for the caregivers are necessary to obtain a sufficient number of completed surveys from a diverse group of respondents.

#### **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 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. 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 members of the study team will sign a confidentiality and nondisclosure agreement (Appendix A5). The study team will ensure the privacy and security of electronic data during the data collection and processing period following

<sup>27</sup> Fredrickson, D.D., Jones, T.I, Molgaard, C.A., Carman, C.G., Schukman, J., Dismuke, S.E. and E. Ablah (2005) Optimal Design Features for Surveying Low-Income Populations. *Journal of Health Care for the Poor and Underserved* 16: 677-690.

the system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports.<sup>28,29</sup> 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 the study team via secure fax, FTP site, tracked mail, or telephone; and will be stored in locked file cabinets or password-protected computers, and accessible only to study team 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 A4.

#### **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 Sponsor Survey (Appendix D13) and Site Supervisor Survey (Appendix E9) are not considered sensitive. The Caregiver Survey (Appendix G7) includes household food security, federal program benefits received by the household, race/ethnicity and income questions; it is possible some participants may consider these questions sensitive. In addition, the Child Participant Survey (Appendix G8), and Teen Survey (Appendix G9) ask for the respondent's sex, which may also be considered sensitive. These questions of a sensitive nature are included in the surveys to obtain information about who is utilizing SFSP and SSO,

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<sup>28</sup>Published in the *Federal Register* on April 25, 1991 (56 FR 19078).

<sup>29</sup> Published in the *Federal Register*, Vol. 65, No. 63, March 31, 2000 (FR 00-8005).

and who is not, a key research objective of the study. All respondents will be informed that they can choose not to answer any question they do not wish to answer and that there are no penalties for not participating. All respondents will be assured privacy, informed that the data will be securely stored, their responses will not be shared with others not involved in the study, except as otherwise required by law and all data will be aggregated in reports.

#### **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.**

#### **12A. Estimated Total Burden**

With this submission, there are 118,641 sampled participants, of whom 25,958 are respondents, providing 426,268 responses, for a total of 23,712 burden hours. The average number of responses per respondent is 3.6 with an estimated response time of 0.06 hours per response. Table A12 - 1 presents the number of respondents, frequency of response, and annual hour burden for State/Local Government State agencies, SFSP and SSO sponsors, former sponsors, and site supervisors (separately for government versus nonprofit organizations), and Individuals/Households. The full burden table can be found in Appendix A6.

**Table A12 - 1. Summary of Estimated Total Burden<sup>1</sup>**

Respondent Type	Respondent Description	Sample Size	Respondents				Nonrespondents				Total Burden Hours	Total Annualized Cost
			Number of Respondents	Frequency of Response (Annual)	Total Annual Responses	Average Hours per Response	Number of Non-respondents	Frequency of Response (Annual)	Total Annual Responses	Average Hours per Response		
<b>State and Local Government</b>	State SNAP and CN Directors	50	42	7.571	318	0.1819	8	6.875	55	0.01670	58.76	\$ 2,672
	CN SFSP and SSO Sponsors	431	348	19.662	6,843	0.2453	83	30.065	2,489	0.01670	1,720.17	\$ 69,306
	CN SFSP and SSO Former Sponsors	18	9	6.067	55	0.1062	9	1.711	15	0.01670	6.06	\$ 244
	CN SFSP and SSO Site Supervisors	643	450	13.355	6,010	0.1532	193	10.449	2,019	0.01670	954.13	\$ 28,509
	<b>Subtotal</b>	<b>1,142</b>	<b>849</b>	<b>15.577</b>	<b>13,225</b>	<b>0.2013</b>	<b>293</b>	<b>15.627</b>	<b>4,579</b>	<b>0.01670</b>	<b>2,739.12</b>	<b>\$ 100,731</b>
<b>Nonprofit Organizations</b>	CN SFSP SPONSORS	287	232	22.146	5,138	0.2239	55	40.706	2,247	0.01654	1,187.72	\$ 41,725
	CN SFSP FORMER SPONSORS	18	9	5.518	50	0.0957	9	1.600	14	0.01670	4.99	\$ 175
	CN SFSP SITE SUPERVISORS	429	300	11.972	3,592	0.1377	129	10.448	1,346	0.01670	517.21	\$ 13,603
	<b>Subtotal</b>	<b>734</b>	<b>541</b>	<b>16.228</b>	<b>8,779</b>	<b>0.1880</b>	<b>193</b>	<b>18.689</b>	<b>3,607</b>	<b>0.01660</b>	<b>1,709.93</b>	<b>\$ 55,503</b>
<b>Individuals and Households</b>	PARENTS/CAREGIVERS and children/teens*	116,765	24,568	9.397	230,855	0.0715	92,197	1.792	165,224	0.01670	19,262.94	\$ 139,656
<b>TOTAL</b>		<b>118,641</b>	<b>25,958</b>	<b>9.741</b>	<b>252,858</b>	<b>0.0823</b>	<b>92,683</b>	<b>1.871</b>	<b>173,410</b>	<b>0.01670</b>	<b>23,712</b>	<b>\$ 295,890</b>

<sup>1</sup>Expected response rates are as follows: States and sponsors: 83%; sites: 70%; caregivers: 16.7%. See table B1-1 in SSB for details.

\* 112,965 parents/caregivers are invited to complete the household screener; 8,756 eligible parents/caregivers will be mailed the survey; 6,800 parents/caregivers will complete the survey.

## 12B. Estimated Cost of Burden

The total estimated annualized cost is \$1,740,724. The estimates of respondent cost are based on the burden estimates and use the U.S. Department of Labor, Bureau of Labor Statistics, May 2016 National Occupational and Wage Statistics. Occupational Group (999200) State Government (excluding schools and hospitals),<sup>30</sup> Occupational Group (999300) Local Government (excluding schools and hospitals),<sup>31</sup> Occupational Group (611000) Educational Services (including private, state, and local government schools)<sup>32</sup> and Occupational Group (624000) Social Assistance,<sup>33</sup> were used to estimate annualized costs for State agency directors, sponsors and site supervisors. Annualized costs were based on the mean hourly wage for each job category.

The hourly wage rate used for the State Directors of SFSP/SSO and the State SNAP Directors is \$43.82 (Occupation Code 11-9030, State Government-999200). The State Director total annualized cost is \$2,672.

For sponsors, the average hourly wage rate for SFA and local government sponsors is \$40.29, which is an average of the hourly wage rate for SFA sponsors of \$39.34 (Occupation Code 11-9039-611000) and the hourly wage rate for local government sponsors of \$41.24 (Occupation Code 11-9039-999300). The hourly wage rate for nonprofit sponsors is \$35.13 (Occupation Code 11-9039-624000). The total annualized cost for sponsors is \$111,0319, of which \$69,306 is for State/local government sponsors and \$41,725 is for nonprofit sponsors.

<sup>30</sup> [https://www.bls.gov/oes/current/naics4\\_999200.htm#11-0000](https://www.bls.gov/oes/current/naics4_999200.htm#11-0000)

<sup>31</sup> [https://www.bls.gov/oes/current/naics4\\_999300.htm#11-0000](https://www.bls.gov/oes/current/naics4_999300.htm#11-0000)

<sup>32</sup> [https://www.bls.gov/oes/current/naics3\\_611000.htm#11-0000](https://www.bls.gov/oes/current/naics3_611000.htm#11-0000)

<sup>33</sup> [https://www.bls.gov/oes/current/naics3\\_624000.htm#11-0000](https://www.bls.gov/oes/current/naics3_624000.htm#11-0000)

For site supervisors, the average hourly wage rate for school and local government sites is \$29.88, which is an average of the hourly wage rate for school sites of \$29.87 (Occupation Code 11-9051-611000) and the hourly wage rate for local government sites of \$29.89 (Occupation Code 11-9051-999300). The hourly wage rate for nonprofit sites is \$26.30 (Occupation Code 11-9051-624000). The total annualized cost for site supervisors is \$42,112, of which \$28,509 is for school/local government sites and \$13,603 is for nonprofit sites.

For caregivers, teens and children the hourly wage rate used is \$7.25 (<https://www.dol.gov/whd/regs/compliance/posters/flsa.htm>), which is the Federal minimum wage for 2017. The total annualized cost for caregivers, teens and children is \$139,656.

#### **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 annual cost to the Federal Government is \$1,174,178 or \$3,522,534 over a three-year period including contractor and Federal government employee costs. The total estimated cost to the contractor is \$3,470,586 over 3 years, representing an average annualized cost of \$1,156,862 for contractor labor, other direct costs, and indirect costs. The information collection also assumes a total of 400 hours of a Federal employee's time per year: for a Social

Science Research Analyst/Project Officer, GS-12, Step 5 at \$43.29 per hour for a total of \$17,316 per year. Federal employee pay rates are based on the Office of Personnel Management (OPM) salary table for 2017 for the Washington, DC, metro area locality (for the locality pay area of Washington-Baltimore-Arlington, DC-MD-VA-WV-PA).<sup>34</sup>

#### **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 23,723 total annual burden hours (20,827 for respondents and 2,896 for non-respondents) and 426,489.90 rounded up to 426,490 total annual responses (253,078.90 for respondents and 173,410 for non-respondents) as program changes to OMB's burden 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.**

The data will be analyzed using descriptive, bi-variate, and multivariate analysis. The findings will be synthesized and published in a technical final report form as well as a summary for the general public – both of which will be posted on FNS website. The final report will address all research objectives. The data analyses will be conducted as follows:

**Prepare analytic data files.** All survey data files will be harmonized across modes. Descriptive statistics will be generated to check for missing data, outliers, and inconsistent data patterns.

Two sets of data from the menu survey will be produced: output from the Access database providing data on all menus within the two weeks of the cycle menus, and output from SurveyNet providing nutrient and food group content of the menus for the one targeted week of

<sup>34</sup> Office of Personnel Management, General Schedule, accessed January 24, 2017, at: [https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB\\_h.pdf](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2017/DCB_h.pdf).

the cycle menus. Component details will be entered in the Access database and menus will be entered in SurveyNet to generate nutrients. SurveyNet uses food codes from USDA's Food and Nutrient Data for Dietary Studies (FNDDS) and allows modification of recipes. FNDDS derives nutrients from the USDA Dietary Data for Standard Reference (SR) database, and includes "recipes" made up of SR codes. The FNDDS food codes provide values for food energy and 64 nutrients and link to the USDA's Food Pattern Equivalent Database (FPED), which provides 37 food group components. The SR codes used in the FNDDS recipes link to the USDA's Food Pattern Ingredient Database (FPID), released for the first time for the 2011-2012 data, and will allow the generation of FPED values for any modified recipes. Recipes will be modified as needed to include whole grain, lean, low fat, and fat free ingredients reported by sponsors or sites.

**Prepare sampling weights.** Sample weights will be prepared for all sponsors, site supervisors, caregivers, and participants as well as nonparticipants. Data tabulations will be weighted, to present nationally represented estimates.

**Tabulate data.** Data tables will be specified for all research questions under the six research objectives (1) program satisfaction and reasons for participation (2) participant and nonparticipant characteristics (3) reasons for program nonparticipation (4) food service characteristics (5) meal content (6) facilitators and barriers to preparing meals. Univariate analyses techniques will be used to describe characteristics of sponsors, sites, participants and nonparticipants, and the nutrition content of meals served. Bivariate analyses will be used to compare characteristics and responses of participants and nonparticipants, and characteristics of sites by subgroups (site location, type of site [open/closed], and SFA/non-SFA), and data tables will be developed.

Multivariate analyses will be used to explore the relationships between key data concepts (e.g., site accessibility, site characteristics) and outcomes (e.g., program participation). Multivariate regression models will be used to explore several relationships. First, multivariate logistic regression will be used to assess the relationship between key explanatory variables of interest (e.g., demographic characteristics, transportation, child care arrangements, site/sponsor characteristics) and the probability of summer meal participation. Second, regression analysis will be used to examine the factors associated with satisfaction, (among summer meal participants). Third, using a two-stage self-selection model, regression analysis will be used to explore the relationship between summer meal participation and household food security. For this analysis, the probability of participation is estimated and then given participation, family characteristics that contribute to food security are modeled. A key challenge of this exploratory analysis lies in the timeline for data collection (some summer meal participants may have participated for less than a month) relative to the measurement of food security, which has a 30-day recall window. Finally, introducing site characteristics into the regression model as fixed effects will be considered as well as potentially using hierarchical linear modeling to account for clustering of children within site.

The nutrient and food content of meals will be compared to the SFSP, SBP, NSLP, CACFP meal standards, Dietary Guidelines for Americans (DGA) and Dietary Reference Intakes (DRIs). Additional data tables will present comparison of study findings with results from previous studies, as available.

Data gathered through qualitative interviews will be analyzed using qualitative data analysis software such as NVivo; data will be coded, and sub-group specific as well as cross-

cutting themes will be identified. These data will be used to provide both context and insights for further understanding the quantitative results.

**Project Time Schedule**

Table A16 - 1 presents the anticipated timeline for activities in the study.

**Table A16 - 1. Project Time Schedule**

<b>Study activity</b>	<b>Schedule</b>
Obtain State lists of SSO and SFSP sites/sponsors	January 2018; June 2018; January 2019
Obtain SNAP Administrative Data from State agencies	January – February 2018
Recruit sponsors, sites, households	April – August 2018
Conduct Data Collection	May – November 2018
Analysis	November 2018 – March 2019
Prepare Final Report	January –August 2019
Prepare Data Files	January – August 2019
Prepare Briefing Materials	May – August 2019

**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.”**

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.