



24 May 2021

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Office of Information and Regulatory Affairs  
Office of Management and Budget

THROUGH: Jamia Franklin, FNS Information Collection Officer  
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Office of Policy Support  
Food and Nutrition Service (FNS)

SUBJECT: Justification for Non-Substantive Change to OMB Control No: 0584-0524  
Evaluation of FY 2019 Summer Electronic Benefit Transfer (EBT)  
Demonstrations to add one grantee and remove two grantees with no  
changes to data collection protocols or burden

FNS is requesting a non-substantive change to the previously approved collection Evaluation of FY 2019 Summer Electronic Benefit Transfer (EBT) Demonstrations (SEBT-X) under the Generic Clearance to Conduct Formative Research or Development of Nutrition Education and Promotion Materials and Related Tools and Grants for FNS Population Groups (OMB Control No. 0584-0524, exp. 12/31/2022).

The SEBT-X Process Study aims to 1) document grantee implementation processes, challenges, and successes and 2) describe participant and retailer experiences with Summer EBT over a three-year period. Results from this evaluation will help FNS understand how Summer EBT projects can be implemented in new and varying settings.

To obtain information from grantees, retailers, School Food Authorities (SFAs) and participants while the project is active, FNS aims to conduct annual in-person or virtual primary data collection (interviews and focus groups) during the summer months (July and August). To achieve this, the study team must begin respondent recruitment in late spring/early summer 2021 to be able to recruit active parents/caregivers of children for focus group participation. Conducting data collection while the project is active is essential for the success of the evaluation; respondents and participants will be able to provide better, more accurate information

regarding successes, challenges, and desired project changes or improvements, while the project is operational.

FNS recently awarded a Summer EBT grant to an Inter-Tribal Organization (ITO) for the 2021-2023 cycle: Cherokee Nation and requests adding Cherokee Nation to the evaluation sample. Additionally, FNS asked two current state grantees, Michigan and Wisconsin, to pause implementation of their Summer EBT projects for the summer of 2021. FNS requests to remove these two states from the evaluation sample. This change request is to simply add Cherokee Nation to the evaluation sample for 2021-2023 and remove Michigan and Wisconsin from 2021 and forward from the sample. Table 1 summarizes the revised evaluation sample members:

**Table 1. Requested Change to Evaluation Sample Grantees**

Data Collection Year	Grantees Included	Grant Cycle Year
2021	Cherokee Nation	Year 1
	ITCA	Year 2
	Chickasaw Nation	Year 3
2022	Cherokee Nation	Year 2
	ITCA	Year 3
2023	Cherokee Nation	Year 3

Attachments B.1 and D have been updated to reflect the new grantees and are included with this non-substantive change request. Attachment B.2 has been removed because it is only applicable for a previous grantee. No changes are proposed to the level of burden. The respondent groups (Grantees, SFAs, Retailers, and Caregivers of Participant Children) will remain the same as those in the original submission for the OMB clearance.

The burden remains the same as the original OMB submission because the third year of data collection for the Michigan grantee and the second and third years of data collection for the Wisconsin grantee are removed. The Cherokee Nation data collection for Summer 2021, Summer 2022 and Summer 2023 for the Cherokee Nation grantee replaces the collective three points of data collection for Michigan and Wisconsin. As such, the respondent groups remain the same, as follows:

- The number of Grantee respondents is four with 4.5 burden hours.
- The number of SFA respondents is eight with six burden hours.
- The number of Retailer respondents is 20 with 7.5 burden hours.
- The number of Caregivers of Participant Children respondents participating in focus groups is 160 with 120 burden hours.

The total number of respondents, burden hours, and responses are summarized in Table 2 below:

**Table 2. Overall Requested Change to Annualized Burden on this Collection**

	Approved	Additional Requested	Revised Estimates
<b>Respondents</b>	524	0	524
<b>Burden Hours</b>	249	0	249

<b>Responses</b>	1,833	0	1833
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Once OMB approves the change, FNS intends to recruit the respondents within the groups mentioned and proceed with data collection.

If you have any questions regarding this request, please contact Jamia Franklin, FNS Information Collection Clearance Officer for the Food and Nutrition Service, Planning & Regulatory Affairs Office at (703) 305-2403.