

**OMB # 0584-0471
SCHOOL FOOD PURCHASE
STUDY III**

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Food and Nutrition Service
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School Food Purchase Study III

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A. JUSTIFICATION

I. Circumstances making the collection of information necessary

a. The study

This study is necessary to implement the requirements of Section 4307 of the Food, Conservation, and Energy Act of 2008 (P.L. 110-246), (H.R. 2419). This legislation directs the U.S. Department of Agriculture (USDA) to carry out a nationally representative survey of the foods purchased by school food authorities during the most recent school year for which data are available. This reflects high levels of Congressional interest in food purchasing for school meals issues and the implications for the efficiency of the school meal provision and the health of schoolchildren.

The study includes two separate components: (a) the collection of food purchase data from a sample of School Food Authorities (SFAs) and (b) a survey of SFA food procurement practices. The same SFAs will complete each data collection component. Food and Nutrition Service (FNS) will submit an interim report to the Committees on Agriculture and Education and Labor of the House of Representatives and the Committee on Agriculture, Nutrition, and Forestry of the Senate by June 30, 2009.

The results will contribute to better understanding of the purchasing behavior of the SFAs and to various factors that influence the efficiency of school meal provision. The data collection procedures proposed are designed to also be used to identify the nutritional profile of the purchases.

b. Program background

The National School Lunch Program (NSLP) (OMB # 0584-0006, expiration date 3/31/2009) has been in operation since 1946. In 2007, it served just over 5 billion lunches to 30 million participants of which 41 percent pay a full price. The School Breakfast Program (SBP) OMB # 0584-0012, expiration date 3/31/2009) has been a permanent program offering assistance to schools with identified needs since 1975. It served 1.7 billion breakfasts in 2007. The USDA's Food and Nutrition Service, operating through state agencies that have agreements with the local school systems in their states, administers the programs nationally. Between 15,000 and 16,000 school systems participate in the NSLP.

Participation in the school meal programs is limited to school systems that meet the federal menu planning or meal pattern requirements and offer free or reduced-price lunches to eligible children. SFAs can also request reimbursement for snacks served to children in afterschool educational or enrichment programs.

Each meal served is eligible for reimbursement through cash payments. This reimbursement rate varies with the prevalence of students who are eligible to receive free or reduced meals. Donated commodities play an important role in the school food programs. Schools are entitled to receive "entitlement" foods to a prescribed value for each meal served in the NSLP and receive "bonus" commodities when available. Donated commodities must be of US origin. The Farm Service Agency and Agricultural Marketing Service purchase most of these commodities and the Food Distribution Division of FNS coordinates the distribution to school systems. In addition, the Department of Defense procures fresh fruits and vegetables using USDA Section 32 funds.

The menu planning requirements have implications for the costs incurred by school meal providers as more nutritious ingredients or meals are often, but not always, more expensive to make available.

Moreover, despite increases in reimbursements, cost pressures can be acute when food prices respond to a wide range of factors affecting global agricultural production and marketing. The volume, composition, and affordability of the school meal programs continue to be issues of considerable public interest. The cost of school meals has been an ongoing concern but it is an important contextual factor today when food prices have recently reached levels that caused SFAs to exceed their budget projections. Approaching the 2009/10 school year (SY), many SFAs face difficult decisions in developing budgets and procedures that balance cost and nutrition in the face of an uncertain financial and food market environment.

Focus on the nutritional status of the meals delivered by the school feeding programs has become prominent, as serious concerns have been raised about child health and very high levels of childhood obesity. This has placed more attention on the quality of foods consumed and less on the quantity. Meals served in the NSLP and SBP must be consistent with the statutory and regulatory nutrition standards, which are based on the principles of the *Dietary Guidelines for Americans*. Some states and local agencies have prescribed even tighter nutritional standards for the foods purchased through the school feeding programs and for other competing foods available within the school environment. To support better nutrition, the recent 2008 Farm Bill extends purchasing of fruits and vegetables for use in school meal programs, promotes more pilot programs to supply schools with fruit and vegetables and whole grains and whole-grain products, and confirms ongoing funding of FNS school meal nutrition promotion activities such as the Team Nutrition initiatives.

The various pressures outlined above have prompted continuous adjustments in procurement practices to gain efficiencies to meet changing circumstances.

c. Previous studies

The U.S. Department of Agriculture has commissioned two previous studies covering the same issues. Information on school food purchases and procurement practices was collected from a sample of 400 school systems during the 1984/85 school year (SFPS-I OMB# 0584-0340, expiration date 12/31/1985) and from 324 in the 1996/97 school year (SFPS-II OMB# 0584-0471, expiration date 06/30/98). Each sample was drawn from the contiguous 48 states. The survey methodology was similar as in each case the sample was divided into four equal groups with information collected from each group for a different three-month period of the year. The sample was drawn from an adjusted frame of 10,866 SFAs in SFPS-I and 11,177 in SFPS-II.

2. Purpose and use of the information

a. Study objectives

The purpose of this data collection is to address five overall study objectives that will assist the FNS and other USDA agencies involved in procurement and distribution of donated commodities and administering the NSLP and SBP. The results will also be of value to all those concerned with the economics of school meal provision and with tracking the nutrition and associated welfare of children attending public schools. This will include many state agencies that are interested in both cost and school meal composition issues. Also, the results can be of significant interest to those organizations involved in supplying food and food ingredients for the preparation of school meals. It will improve transparency of markets and enhance the quality of decision-making and the overall allocation of resources in this sector.

Each of five objectives has been translated into one or more researchable questions. Denoted below are the research objectives which are summarized as questions in Appendix 6. These questions serve as a principal guide to the requirements for the data collection. They will also help determine the analytic techniques employed and the presented format of analytic results.

1. Develop national estimates of the quantity, value and per unit value of purchases
2. Analyze changes in the mix of foods and relative costs since 1996/97
3. Compare the mix of foods acquired by various subgroups within the population
4. Analyze school food purchase practices and their relationship to food costs
5. Analyze the role now being played by a la carte foods

The data collected and their analysis will contribute to decisions relating to the levels of reimbursement of meals, distribution procedures, communication policies as well as considerations of the general direction of current and past policies. The absence of this information could lead to the misalignment of programs to local needs (for example in the provision of donated foods) and the setting of program parameters that are inefficient (that incorrectly reflect the cost of purchasing foods).

b. From whom will the information be collected?

The information will be collected from a sample of 400 SFAs in the contiguous 48 states and a minimum of 18 and a maximum of 30 SFAs in Alaska, Hawaii and Puerto Rico (depending on the response of the larger SFAs in Alaska). In an estimated 15% of SFAs, Food Service Management Companies (FSMCs) manage the school meals service. In these cases, they will supply the information. Project staff will contact each liaison person by telephone for purposes of introducing themselves and the study and to answer any immediate questions. This will be followed by a letter from the Project Director that will describe the background and components of the study (see Appendix 7). A person will be designated by the SFA or FSMC to supply the food purchase information requested. Another person will also be designated to complete the procurement practices survey. These usually will be different persons.

c. How will the information be collected?

The SFAs will supply source documents or computer records of food purchases from suppliers. The contractor will work with the designated study liaison from each school district to obtain the required information. The prime source of information will be all of the invoices and other records of purchases from all vendors. The SFAs and FMSCs will not be required to record information. They will pass the information to the designated project office by e-mail, fax and post where data collection will be assembled and transcribed for analysis by the contractor.

In light of the need to minimize respondent burden, FNS proposes to use the same successful procedures used in the 1996/97 study. SFAs that participate have maximum flexibility to provide data in a form that is most convenient to them. In many, if not most cases SFAs will provide the contractor with either electronic copies of vendor summaries or invoices or alternatively photocopies or scans. It was confirmed in the pretest of the data collection instruments that many more purchasing records are maintained electronically today than in 1996/97 and hence the task of forwarding this information to the contractor will be much simpler than for the previous study. This will make it easier to recruit and retain SFAs in the study and improves the quality of the data.

The food purchase data collection will be tailored to the individual district's needs and abilities while removing as much of the burden as possible from the school districts and ensuring the quality of the data. This approach proved to be highly cost-effective in SFPS-II. Districts will choose one of the following methods or a combination of methods to best suit their needs:

1. **Vendor summaries:** During SFPS-II, the contractors found that many of the participating districts had one or more vendors who were able to provide a monthly summary of purchased foods. The use of such summaries imposes no burden on the district except to request such a summary. The contractor will send each SFA a sample letter that may be used to request information (see Appendix 10). Data can also be extracted by the contractors from vendor summaries that are generated by the SFA through any computerized ordering system they might use. This method is likely to be much more commonly available today.
2. **Copies of invoices:** For vendors who do not have summary capability, districts usually prefer to send copies of invoices. This method is relatively cost effective for districts because no knowledge of food purchasing is required. Districts need only detail personnel to copy or scan the invoices before they are filed. It is expected that some invoices will be available in electronic format, which will spare district personnel the need to photocopy them. Additionally, some vendors are willing to provide duplicate copies of invoices if requested, and some do so automatically.
3. **Tally sheets:** For food items such as bread, milk, and snack items, districts may prefer to send in tally sheets compiled at the district offices. This method is generally quicker and more efficient than copying invoices since tally sheets generally cover many deliveries, but only for a few, similarly priced products in a limited range of sizes.
4. **Bid specifications:** The quality of the data collected from invoices and tally sheets can be greatly enhanced by reference to district bid specifications (most of which will be in the public domain). These documents can provide more detailed information about product characteristics purchased, i.e., fat content in ground beef or salad dressings, and unit size and weight information. However, volumes and prices need to be identified by one or the other of the methods listed above.

The survey instrument used to collect information on food procurement practices will be similar to that used in 1996/97. While continuing to collect information on basic characteristics of the districts' feeding programs and procurement procedures, some of the questions have been replaced to accommodate current concerns such as food safety, traceability and nutrition. Because of these changes, we anticipate that **the only net increase in respondent burden** relative to the 1996/97 study will arise from the inclusion of Alaska, Hawaii and Puerto Rico. A crosswalk between the questions that appeared in the 1996/97 study those in this study is presented in Appendix 5.

d. How frequently will the information be collected?

This is a one time data collection. For the contiguous 48 states, each SFA will supply food purchase data for one quarter (3 months) only. See Section 7 for a discussion of the circumstances under which SFAs in Alaska, Hawaii and Puerto Rico will supply information for longer periods.

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

3. Use of information technology and burden reduction

FNS makes every effort to comply with E-Government Act, 2002. Therefore, we anticipate that many more food purchase records will be available on electronic media for this study because of the advance of electronic systems since 1996/97. Thus, much of the material can be provided to the contractor's data collection office with relative ease (by forwarding copies of invoices or scanned copies of invoices). As there are many different data handling systems operating within the SFAs and FSMCs, the contractor's project data collection office will most likely be required to manually transcribe most of the information into data files.

4. Efforts to identify duplication and use of similar information

There is no similar information available.

5. Impact on small businesses or other small entities

This data collection is designed to minimize respondent burden. FNS will use the same successful procedures used in the 1996/97 study. As noted in supporting statement A2c above, participating SFAs have maximum flexibility to provide data in a form that is most convenient to them.

6. Consequences of collecting the information less frequently

This study builds on two previous studies conducted 12 and 24 years ago. School feeding programs have undergone massive changes over this period. The nutritional well-being of our nation's youth, including health implications, has become an important policy issue. This study will provide FNS with much needed evidence about how schools are responding to new nutritional requirements and regulatory initiatives. It will also help guide USDA agencies in their procurement of commodities, for 2007 totaling over \$1 billion, for donation to schools. If this study is not conducted, it would obstruct the agency's ability to measure the impact these changes are having on the costs of school meals and on child nutrition.

7. Special circumstances relating to the guideline of 5 CFR 1320.5

a. Requiring respondents to report information to the agency more often than quarterly

For all the contiguous 48 states, SFAs will supply food purchase data for one quarter (3 months) only. Because of the overwhelming importance of the Anchorage SFA (37% of the state's school enrollment in 2007), the sampling approach requires that data is requested for more than one quarter from this district. The extent to which data needs to be collected for more than one quarter from the other larger Alaskan districts will depend on the period of participation of the Anchorage SFA. Also as there is only one district in both Hawaii and Puerto Rico, and because of the impact of seasonality on food purchases, data will be collected year round from these two districts.

There are no other special circumstances. The remainder of this collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.5.

8. Comments in response to the Federal Register Notice and efforts to consult outside agency

FNS published a notice in the Federal Register, Vol. 73, Page 78287, No. 246, on Monday, December 22, 2008.

FNS received two responses to the Federal Register Notice, which are included in this submission.

FNS has contracted with Promar International to manage SFPS-III. This contractor brings the accumulated experience of negotiating all the challenges of the last survey, the key members of the previous project team including the previous director (serving as a specialist adviser), the entire data collection team, and the statistician. The data collection team brings insights on current procurement practices and data availability as a result of ongoing participation in the Commodity Letter of Credit (CLOC)/Cash Program.

The contractors have discussed the study with the School Nutrition Association which has agreed to support the study by preparing a letter from their Executive Director to the selected SFAs (see Appendix 8). In addition, comments have been elicited from USDA's National Agricultural Statistics Service on data available within the Department. Also, the contractors have discussed the survey elements with a member of the Nutrition Committee of the School Nutrition Association, and have received some suggestions from the National Dairy Council (NDC). The NDC were assured that milk and cheese purchases would be differentiated by fat content, and milk by flavor, but were told that the data could not be broken out by specific feeding program, or by entitlement versus bonus in the case of cheese. NDC were also interested in the volume of cheese incorporated in processed foods. While this is not a planned output of the study, it might be possible to derive the information from the planned nutritional analysis if funds are available.

The information collection has been reviewed by the National Agricultural Statistics Service of USDA with special reference to the statistical procedures. A report was prepared by NASS and the issues raised were reviewed. The recommendations were taken into consideration and some modifications were introduced accordingly.

9. Explanation of any payment or gift to respondents

Participating SFAs will be paid an administrative reimbursement at the rate of one cent per reimbursable meal (based on their October 2008 meal count), with a minimum expense of \$100 per district and a maximum expense of \$400 per district. This will compensate for the time and copying costs they incur in providing the paperwork documenting their food procurement. While the estimated average amount per SFA (\$300) is not large, for small SFAs they cannot readily afford this expenditure. Offsetting this expense helps ensure their participation in the study and improves the reliability of the results. The approach employed in SFPS-II and the feedback received confirmed its positive impact in terms of attracting and retaining SFA participants. The response rate for SFPS was 67 percent (see Section B 1a and B 3).

10. Assurances of confidentiality provided to respondents

The proposed data collection will produce data on the costs to SFAs of acquiring food and on the preparation and serving practices that influence those costs. In addition, general information on SFA

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contracts with vendors will be collected. Most, if not all, of the information is in the public domain. Nevertheless, the information provided will not be disclosed to anyone but the analysts conducting this study, except as otherwise required by law. Data will be presented in aggregated form and therefore cannot be linked back to the response of any individual school district.

11. Justification for sensitive questions

This study does not contain questions of a sensitive nature.

12. Estimates of hour burden including annualized hourly costs

Table 1 shows the estimates of the respondent burden for the proposed data collection. These estimates reflect consultations with program officials, the contractor’s prior experience in collecting food purchase data, and a pre-test of the survey instruments and procedures. Table 2 shows the estimated annualized cost to respondents. It has been calculated using average hourly earnings for May 2007 obtained from the Bureau of Labor Statistics’ estimates for occupational employment wages (http://data.bls.gov/oes/search.jsp?data_tool=OES).

Table 1: Estimates of respondent burden

(a) Type of respondents	(b) Type of survey instruments	(c) Number of respondents (a)	(d) Frequency of response	(e) Total annual responses	(f) Average burden hours per response	(g) Total annual hour burden
	Data collection					
	1. SFA food purchases					
SFA Foodservice director	a) data negotiation	425	1	425	0.75	318.75
SFA Foodservice personnel	b) purchase data	425	1	425	10.00	4,250.00
SFA Foodservice director	c) SFA review	425	1	425	0.50	212.50
SFA Foodservice director	2. SFA practices	425	1	425	1.25	531.25
						-
TOTAL				1,700	12.50	5,312.50

(a) NB The target is 400 in the contiguous states. The number of respondents sought in Hawaii, Puerto Rico and Alaska can vary from 18 to 30 depending on the response of larger SFAs in Alaska. There will be approximately 425 respondents in total.

Table 2: Annualized cost to respondents

Type of respondents	Type of survey instruments	Avg. time per response	No. of respondents (a)	Frequency of response	Hourly wage rate	Respondent cost
	Data collection					
	1. SFA food purchases					
SFA Foodservice director (c)	a) data negotiation	0.75	425	1	\$23.39	\$7,456
SFA Foodservice personnel (b)	b) purchase data	10.00	425	1	\$14.39	\$61,158
SFA Foodservice director (c)	c) SFA review	0.50	425	1	\$23.39	\$4,970
SFA Foodservice director (c)	2. SFA practices	1.25	425	1	\$23.39	\$12,426
						\$86,009

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- (a) NB The target is 400 in the contiguous states. The number of respondents sought in Hawaii, Puerto Rico and Alaska can vary from 18 to 30 depending on the response of larger SFAs in Alaska. There will be approximately 425 respondents in total
- (b) OES 35-1012 First line supervisors/Managers of food preparation and serving workers,
- (c) OES 11-9051 Food service managers.

13. Estimates of other total annual cost burden to respondents or record keepers

There are no capital, start-up, or annualized maintenance costs to respondents. Respondents can use administrative reimbursements (described in Section A.9 above) to cover modest operating costs for documents scanning, photocopying or mailing.

14. Annualized cost to Federal Government

The estimated total cost of the time and materials contract is \$2,320,596. The cost of activities associated with this data collection will be about \$ 931,452. The total cost for administrative reimbursement allowance (described in Section A.9 above) is approximately \$120,000.

15. Explanation for program changes or adjustments.

Since the last data collection, FNS has added additional respondents which currently extends the data collection outside the contiguous 48 states to SFAs in Alaska, Hawaii and Puerto Rico. This is an increase of between 18 and 30 respondents. The total burden increases from 5,200 hours for the SFPS-II in 1996/7 to 5,313 hours for SFPS-III. This is an increase of 113 hours. This increase in burden hours results from extending the study to Alaska, Hawaii and Puerto Rico.

16. Plans for tabulation and publication and project time schedule

The project time schedule is in Table 3 below. The project started on October 23, 2008. The school year under study begins on July 1, 2009 and finishes on June 30, 2010. FNS expects to have data for the purchase data and the procurement practices survey completed by October 2010. Separate databases for the information on food purchases, commodity donations and the results of the procurement practices survey will be complete by January 2011. Analysis will begin after the full purchase database is complete and its accuracy and integrity confirmed. Analysis will be complete by May 2011. Reports will be submitted in July and September 2011. Publication of the final reports will be available on the FNS web page.

Table 3: Project time schedule

Task	Timing
Select and recruit SFAs	Immediately after OMB approval
Select SFA trainers	Immediately after OMB approval
Train SFA staff	After SFAs and trainers selected
Collection of food purchase data	July 2009 to October 2010
Procurement practices survey	Oct 2009, Jan 2010, Apr 2010, July 2010
Complete development of databases	January 2011
Complete analyses	May 2011
Draft report complete	July 2011
Final report complete	Sept 2011

There will be two types of products resulting from the analysis of this data. One will be data tables showing relationships among variables and presenting study findings. The other product will be the results of statistical analysis, including multiple regression analysis. In addition, the FNS will contract for the data collected on food purchases to be used to identify the nutritional value of purchases using established nutritional databases. This will be the subject of a separate report and does not involve any additional data collection.

a. Analytic techniques to be applied

Data and findings will be summarized and compared to the previous studies. It is anticipated that extensive analysis will be required to answer the research questions identified (see Appendix 6).

Multiple regression analysis will be used to help interpret the results and to estimate the direction, magnitude, and statistical significance of any influence. Dependent and independent variables for this analysis will be identified and estimated based on information from the procurement practices survey, the data negotiation protocol sheet, SFA food purchase and commodity donation data, relevant state staff, and the Quality Educational Data (QED) database used as the sampling frame (See Section B1a).

With the large data set that will result from the study, it will be possible to conduct a variety of multivariate analyses. Three obvious candidates for dependent variable are unit costs, various measures of the mix of foodstuffs purchased, and the proportion of total food accounted for by a la carte items. Some of the independent variables that might influence these are as follows:

1. Unit cost = f (bid procedure, number of vendors, urban vs. rural, FSMC vs. non-FSMC, etc.)
2. Fruit & vegetable share of total pounds = f (income, region, FFVP participation, menu plan type, etc.)
3. A la carte share = f (income, relative cost, SFA decision making, etc.)

Whenever possible findings will be presented so that inferences can be readily drawn. A combination of tabular and graphic techniques will be used. Where possible, to facilitate comparison of findings, the same format and units and levels of disaggregation will be used as in reporting results of the earlier studies.

b. Analytic products

Since results of this study will be compared with findings of the 1996/97 study, most of the same table shells will be used, plus additional tables for comparison of 2009/10 data to the 1996/97 data. It is anticipated that some of the independent variables influencing outcomes in 2009/10 will be different than those in 1996/97 and hence there will likely be some variation in the tables that prove worthy of presentation and discussion.

The format and unit of measure of tables showing change between these periods will vary, depending on the topic, though most will be measured in terms of percent change. For the large number of tables describing procurement practices, measures of change between 1996/97 and 2009/10 will be limited in most cases to all districts rather than disaggregated by district size or by the other variables against which they are compared.

17. Reasons display of OMB date is inappropriate

All data collection instruments will display the OMB approval number and expiration date.

18. Exceptions to certification for Paperwork Reduction Act submissions

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