

## **SECTION A**

### **School Nutrition Dietary Assessment Study IV**

**(OMB No.: 0584-0527)**

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## **A. JUSTIFICATION**

**Response to Terms of Clearance for SNDA-III** – “FNS should track and report back to OMB on how the incentives impacted response rates and data quality. While OMB does not need to be involved in the design of this tracking, FNS must study the impact to inform respondent outreach, recruitment, and incentives strategy for future SNDA iterations.”

The proposed incentive of \$50 for respondents of the SNDA-IV menu survey builds upon the success achieved in the SNDA-III study by offering a comparable incentive. The primary reason incentives were used in SNDA-III was to promote higher response rates than had been achieved in the preceding SNDA study (SNDA-II). In SNDA-II, the overall response rate for the menu survey, among schools in SFAs that agreed to participate in the study, was 87.8 percent. The only incentive offered to menu survey respondents was a report that presented nutrient analysis results for the five-day menu reported on in the Menu Survey. The promise of the report was not very compelling for respondents who needed encouragement to complete the menu survey. Some respondents were not interested in the results and others already did their own nutrient analysis. In contrast, SNDA-III offered an incentive of \$40 to menu survey respondents (in the form of a gift card to a national bookstore chain), and achieved an overall response rate of 95 percent for the menu survey. This improvement in response rate, with no observable decline in data quality, suggests a positive impact of the incentive and provides strong justification for including a comparable incentive in the SNDA-IV study. The proposed incentive of \$50 is an increase over the \$40 incentive provided in SNDA-III. This increase reflects the increasing budgetary pressures in many schools that result in a greater premium on staff time.

There is no precedent from previous SNDA studies for the incentive proposed for respondents who will complete the competitive foods checklists because these data were not collected in SNDA-II and were collected by on-site field staff in SNDA-III. The competitive foods checklists will be completed by school staff that are not part of the USDA school meal programs and will collect data on foods available in venues not affiliated with the school meal programs. Thus, the fact that the district and school foodservice department agreed to participate in the study may not have much influence on the cooperation of these respondents. During the SNDA-IV pretest, we asked respondents about incentives—whether they would have completed the data collection if the incentive were not offered and how they would have responded to other incentive amounts. Feedback from pretest respondents suggested that an incentive was necessary for encouraging high response rates and that a tiered incentive structure, linked to the school level and quantity of vending machines (the most common source of competitive foods), would be most effective.

## **1. Circumstances Making the Collection of Information Necessary**

The Food and Nutrition Service (FNS) of the U.S. Department of Agriculture (USDA), is requesting a reinstatement of a previously approved OMB No. held by the third wave of the School Nutrition Dietary Assessment Study-III (SNDA-III) (OMB No.: 0584-0527, Expiration Date: 1/31/2008). The reinstatement request is for the fourth wave of the *School Nutrition Dietary Assessment Study-IV (SNDA-IV)*. The programs to be studied include the National School Lunch Program (NSLP) (OMB No.: 0584-0006, Expiration Date: 05/31/2012) and the School Breakfast Program (SBP) (OMB No.: 0584-0012, Expiration Date: 05/31/2012)—programs that are an important part of the Nation’s food safety net for

children. If approved, SNDA-IV will collect a broad range of data from nationally representative samples of public School Food Authorities (SFAs) and schools. SFAs administer the NSLP and SBP and are generally school districts or groups of districts.

SNDA-IV is a continuation of the series of SNDA studies that demonstrate the long-standing commitment of USDA/FNS to periodic assessment of the school meal programs. USDA's strategic plan calls for implementation of the SNDA studies every five years to provide the information needed to assess progress toward nutrition-related goals for the NSLP and SBP. The core component of the SNDA studies focuses on assessing the nutrient content of school meals offered and served to students in elementary, middle and high schools. The SNDA studies also assess issues related to the operation of school meal programs, particularly aspects that may influence the nutrient content of meals offered to children, children's decisions to participate in the meal programs, and the experiences of children who do participate in the programs.

The SNDA studies have made significant contributions to school nutrition policy over the years. Perhaps most noteworthy is the impact of the finding from the SNDA-I study (OMB No.: 0584-0413, Expiration Date: 9/30/1992) that lunches served in the NSLP were high in fat and sodium, relative to the 1990 Dietary Guidelines for Americans (DGAs). This finding was the impetus for historic changes in the school meal programs, including legislation that required school meals to be consistent with the DGAs; significant changes in the systems and requirements that govern the way schools plan menus; and implementation of the School Meals Initiative, a comprehensive, nationwide initiative to improve the nutritional quality of school meals. Similarly, the recently completed SNDA-III study is providing valuable information to policymakers at FNS as well as to an FNS-sponsored Institute of Medicine

(IOM) Panel which convened in June, 2008. The IOM panel will propose changes to existing NSLP/SBP meal patterns and nutrient standards to reflect the most current dietary guidance as embodied in the Dietary Reference Intakes, the 2005 DGAs, and the MyPyramid food guidance system.

## **2. Purpose and Use of the Information**

SNDA-IV will provide federal, state, and local policymakers with needed information about how federally sponsored school meal programs have changed since the last SNDA study was conducted. The Richard B. Russell National School Lunch Act, Section 28, 42 U.S.C. 1769i authorizes program evaluation activity. The last SNDA study (SNDA-III; OMB No.: 0584-0527, Expiration Date: 1/31/2008) collected data in school year 2004-2005. Comparisons of results from SNDA-IV with the previous SNDA studies will provide information about trends in the nutrient content of school meals over the last two decades. SNDA-IV will collect data in school year 2009-2010 with data collection ending in May-June 2010. Since all data will be collected from individuals at their place of employment during work hours, SNDA-IV data collection will not interfere with the 2010 Census.

SNDA-IV will also provide information on schools participating in the HealthierUS School Challenge (HUSCC) (OMB No. 0584-0524, Expiration Date: 3/31/2010) in order to understand how they are performing and meeting health, nutrition, and wellness standards. The HUSCC is administered by FNS to recognize schools that are creating healthier school environments through their promotion of good nutrition and physical activity. The HUSCC reflects the recommendations of the *2005 Dietary Guidelines for Americans*, and the Institute of Medicine (IOM) published recommendations (April 2007) for foods that should be served in schools, outside of the planned school lunch meals. School in HUSCC must also have a

local school wellness policy as mandated by Congress. Local school wellness policies support the HUSSC initiative and affirm that schools play a critical role in promoting student health, preventing childhood obesity, and combating problems associated with poor nutrition and physical inactivity.

Data collected in SNDA-IV can be used by FNS staff to compare current school meals to potential alternative meal patterns and nutrient standards—those recommended by the IOM panel or others generated internally. SNDA-IV will also gather information about the design and implementation of wellness policies required under the 2004 reauthorization. Finally, for the first time, SNDA-IV will assess the food and nutrient content of afterschool snacks provided through the NSLP. SNDA-IV will also enable the conducting of food and nutrient content analysis for both non-HUSSC and HUSSC schools. The study will address three broad sets of research questions of interest to USDA, the states, SFAs, and other program stakeholders:

- What are the characteristics of schools and SFAs participating in the NSLP/SBP, particularly as they relate to meal service operations and the food environment?
- What are the characteristics of meals and snacks offered and served to students?
- How have school food service and school environment characteristics and meals offered and served to students changed over time?

SNDA-IV will collect information from nationally representative samples of SFAs and schools. Information will also be collected from a purposeful sample of 30 HUSSC schools and their SFAs drawn so as to be reflective of all HUSSC schools and their SFAs on key variables, such as geographic location, school size (number of students), rural/urban location, and grade distribution. The purposeful sampling of HUSSC schools is required because of their low incidence (358 as of June 2009) in the population of schools in the United States.

The low incidence of HUSSC schools limits their likelihood of being sampled in sufficient numbers in the core probability sample of SNDA-IV for analysis purposes.

Approximately half of the sampled SFAs in SNDA-IV's core probability sample will be asked only to complete a web-based survey, with the option for telephone completion (described later in this section). The other half of the sampled SFAs will be recruited to participate in school-level data collection (See Appendix A for recruitment materials). (Note: The administration of the same SNDA-IV recruitment and survey materials to non-HUSSC and HUSSC schools is possible since a list of HUSSC schools and contact persons will be made available by FNS; thus, foregoing the need to identify HUSSC schools through screening calls.) SFA Directors who agree to participate in school-level data collection will complete a brief telephone interview (Appendix B) to provide key information about the SFA and the schools sampled for data collection. All recruitment calls and interviews will be completed by trained, permanent, professional senior and mid-level staff from Mathematica Policy Research. All staff will have experience recruiting for studies of school meal programs and/or other school-based studies. Senior staff will be assigned to the largest SFAs and to any SFAs that are expected to present challenges, based on input from State Child Nutrition directors.

Approximately three schools in SNDA-IV's core probability sample will be sampled in each SFA. School foodservice managers in sampled schools will complete a five-day menu survey (Appendix C), providing detailed information about the foods and beverages offered and served in school breakfasts, lunches, and, if offered, afterschool snacks. The menu survey will also collect information, for one day, about foods available for a la carte purchase at breakfast and lunch. Menu survey data will be collected through hard-copy forms, with

substantial technical assistance provided through detailed written instructions (Appendix D), telephone-based training (Appendix E), and telephone follow-up (Appendix F), an approach that has worked well in previous SNDA studies. Foodservice managers will also complete a separate survey (Appendix G) that covers topics related to school food service operations. Principals in sampled schools will complete a web-based survey, with the option for telephone completion (See Appendix H for a hard copy of the survey instrument and the electronic mailings that will be used to communicate with principals.). School staff appointed by principals (referred to as school liaisons) will complete an observation checklist (Appendix I) to document availability of competitive foods—foods that are sold, served, or given to children in schools but are not part of reimbursable school meals or snacks. Competitive foods may be sold on an a la carte basis through the school food service program or through other venues on school campuses, including vending machines, school stores, and fund-raising events. Finally, all SFA Directors, whether selected for SFA-only or school-level data collection, will be asked to complete a web-based survey, with the option for telephone completion (See Appendix J for a hard copy of the survey instrument and the electronic mailings that will be used to communicate with SFA directors.).

The information collected will be disseminated to program stakeholders, researchers, and the general public through written reports. The study's draft and final reports will include two volumes: one volume will present major findings, including results from the analysis of HUSSC schools, and conclusions from the study. The other volume of the draft and final reports will describe sampling and data collection procedures. Technical appendices will be included as necessary to document analytic procedures. A user-friendly summary report will be developed with a format suitable for a wide audience, using visuals (graphs and figures) to

highlight main findings. All study documents will be posted to FNS's website (<http://www.fns.usda.gov/ora/menu/>).

In addition, to allow other researchers to replicate SNDA-IV analyses or to address other research questions, a public database will be made available. The public database will include all of the variables that were collected or computed during analyses carried out to address the study's research questions.

The previously approved collection was the SNDA-III study (OMB No.:0584-0527, Expiration Date: 1/31/2008). SNDA-IV continues the core focus of the SNDA studies on the assessment of the nutrient content of meals offered and served in the NSLP and SBP and progress toward nutrition-related goals. The underpinning methodological, sampling and analysis techniques to be used in SNDA-IV build on those employed in the prior three SNDA studies. SNDA-IV will have larger samples of SFAs (630 vs. 129) and schools (930 vs. 398) than SNDA-III (includes purposeful sample of 30 HUSSC schools and their SFAs). These larger samples will provide sufficient data for the sample of HUSSC schools and the statistical power needed to obtain better estimates of variables to be measured in SNDA-IV's core probability sample at the SFA level as well as more reliable estimates of the nutrient content of meals offered and served at three different school levels (elementary, middle, and high).

SNDA-IV will not collect data from students and parents. These data are collected in every other iteration of the SNDA studies (to date, SNDA-I and SNDA-III), with the intervening studies (SNDA-II and SNDA-IV) focusing solely on data collected from SFAs and schools. Because data are not being collected from students and parents, SNDA-IV will not include on-site data collection. Consequently, changes are required in the methods used to

collect some data. These changes will improve efficiency and minimize respondent burden. For example, in SNDA-III, surveys of SFA Directors and principals were administered in person by on-site data collection staff. In SNDA-IV, web-based surveys, with the option for telephone completion, will be used to collect data from these respondents. Similarly, in SNDA-III, on-site data collectors completed checklists to provide information about the availability of competitive foods in schools. In SNDA-IV, these checklists (Appendix I) will be completed by a designated liaison in each school (as assigned by the principal). School liaisons will receive, via e-mail, a web-link to a training document (Appendix K) that they can review at their convenience. The training document provides an overview of the data to be collected and instructions for completing study forms in a simple, graphic format with illustrative examples. Trained technical assistants from Mathematica Policy Research will be available, via a toll-free number 1-800-xxx-xxx-xxxx, to address any questions respondents may have (Appendix L). Finally, in SNDA-III, school foodservice managers completed a self-administered menu survey as well as a separate school foodservice manager survey that was administered via telephone. In SNDA-IV, the school foodservice manager survey (Appendix G) will be designed for self-administration and packaged with the menu survey (Appendix C). This data collection approach was used successfully for this survey in SNDA-II.

### **3. Use of Information Technology and Burden Reduction**

In compliance with the E-Government Act, 2002, information technology has been incorporated into the data collection to reduce respondent burden. Electronic mail will be used, whenever possible, to communicate with respondents (See, for example, Appendices H and J). Surveys of both SFA directors and school principals will be web-based, with an option for telephone completion (Copies of all electronic communications and the screen

shots for the web-based surveys will be prepared by the contractor and made available.). We expect that 60 percent of respondents will complete surveys via the web. Rather than asking school liaisons to participate in a telephone-based training, they will receive, via e-mail, a web-link to a training document that they can review at their convenience (Appendix K). The document provides an overview of the data to be collected and instructions for completion in a simple, graphic format with illustrative examples.

Information will be gathered from existing data sources, wherever feasible. Other information, such as names and locations of SFAs and the telephone numbers, addresses, and e-mail addresses of SFA directors, will be obtained from computerized files maintained by State Child Nutrition Agencies. Basic demographic information for SFAs and schools will be obtained from the Department of Education's Common Core of Data and the Census Bureau's school district tabulations.

#### **4. Efforts to Identify Duplication and Use of Similar Information**

There is no similar data collection available. Every effort has been made to avoid duplication. FNS has reviewed USDA reporting requirements, state administrative agency reporting requirements, and special studies by other government and private agencies. FNS solely administers the school meal programs.

#### **5. Impacts on Small Businesses or Other Small Entities**

Information being requested or required has been held to the minimum required for the intended use. Although there are small SFAs involved in this data collection effort, they deliver the same program benefits and perform the same function as any other SFA. Thus, they

maintain the same kinds of information on file. FNS estimates that one percent of our respondents are small entities, approximately 40 respondents.

## **6. Consequences of Collecting the Information Less Frequently**

The proposed data collection activity involves a one-time data collection. The respondents are requested to respond once. Without this information, FNS will not be able to assess progress toward key strategic goals for the NSLP and SBP or identify related training and technical assistance needs of SFAs and schools.

## **7. Special Circumstances Relating to the Guideline of 5 CFR 1320.5**

There are no special circumstances. The 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 the Agency**

A notice was published in the *Federal Register* on March 9, 2009. Volume 74, Number 44, pp. 9980-9981. A total of 1 comment was received. The Office of Research and Analysis (ORA) has taken the School Nutrition Association (SNA)'s comment under consideration and prepared a memo addressing their concerns. Original hard and electronic copies of comments and responses are provided in Appendix M.

In developing data collection plans, the contractor consulted with two subject matter experts. Ms. Patricia McKinney, an independent consultant who was the Project Officer for all three previous SNDA studies (309 Grebe Drive, Lake Frederick, VA 22630; (540) 868-9977; mpatmckinney@verizon.net). Ms. McKinney reviewed the design and all study instruments. She will also review drafts of all study reports, as they are written. Ms. Tracy

Fox, President of Food and Nutrition Policy Consultants, a firm with strong connections in the school foodservice community and in-depth knowledge about program policies and on-the-ground program operations, was also consulted. Ms. Fox provided guidance in identifying and developing survey items that address new or expanded areas of interest for SNDA-IV, including school wellness policies and afterschool snack programs. She also contributed to the design of instruments to collect information about the availability of competitive foods.

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.

In addition, we consulted with the following individuals to obtain input on the availability of data on afterschool snacks and the feasibility of the proposed approach to collecting these data:

Ms. Abigail Lowe  
Program Director  
Sports 4Kids  
(617) 522-3600  
ALowe@sports4kids.org

Ms. Marla Caplon  
Food Services Supervisor  
Montgomery County Public Schools  
(301) 840-8179  
Marla\_R\_Caplon@mcpsmd.org

Jessie Coffey  
Nutrition Specialist  
Lincoln Public Schools  
(402) 436-1745  
jcoffey2@lps.org

## **9. Explanation of Any Payment or Gift to Respondents**

School food service managers will be reimbursed \$50 for the time they spend completing the menu survey. Respondents can donate this payment to the school if required by school policy. In addition, school liaisons completing the competitive foods checklist in middle and high schools will be reimbursed for their time. The amount of time required to complete the checklist will vary, depending on the number and type of vending machines to be inventoried and the nature of the competitive food environment (options such as school stores and snack bars are more available in high schools). Therefore, reimbursement will vary, as summarized below:

- Middle or high schools with five or fewer beverage machines—\$15
- Middle schools with six or more beverage machines—\$30
- High schools with six or more beverage machines—\$35

## **10. Assurance of Confidentiality Provided To Respondents**

All respondents' information will be kept confidential and not disclosed to anyone but the analysts conducting this research, except as otherwise required by law. No information will be disclosed by the contractor that permits identification of individual SFAs, schools, or respondents except, otherwise required by law. During the life of the project, hardcopy documents will be stored in secured file cabinets and rooms and electronic data will be maintained on secured, password-protected computer servers. Both sources of data will be accessible only by approved contractor staff. All permanent and temporary employees of Mathematica Policy Research are required to sign a confidentiality agreement (Appendix N).

To allow other researchers to replicate SNDA-IV analyses or to address other research questions, a public-use database will be created. The database will include all of the variables that were collected or computed during analyses carried out to address the study's research questions. To maintain confidentiality, all individual identifiers will be stripped from this file.

#### **11. Justification for Sensitive Questions**

The information collection does not involve questions of a sensitive nature. However, all respondents will be informed that they can decline to answer any question they do not wish to answer and there are no negative consequences for not participating.

#### **12. Estimates of Hour Burden Including Annualized Hourly Costs**

A total of 7,111 burden hours are estimated for this study. The burden estimate has been increased over the estimate presented in the 60 Day Notice in the Federal Register (6,869.68 hours). The increased burden, over the estimate in the 60 Day Notice, is due to the planned administration of the SNDA-IV surveys to a purposeful sample of 30 HUSSC schools and their SFAs.

Study recruitment and data collection will occur fall 2009 through mid-summer 2010. Table A.1 reports estimates of burden hours, including those for the purposeful sample of HUSSC schools and SFAs. Burden estimates for most instruments are based on burden associated with comparable instruments in the SNDA-III study. Although SNDA-IV survey instruments include some new items, the use of web-based surveys rather than in-person interviews should result in a comparable or slightly reduced burden. In addition, some items in the SNDA-III surveys were dropped to maintain consistency in overall burden. The SNDA-III burden estimate for the menu survey was adjusted for SNDA-IV to reflect the additional

burden associated with collecting data on afterschool snacks, based on a pretest with nine respondents. The burden estimate for the competitive foods checklist is based on a pretest with six respondents.

**Table A.1—Reporting Burden (including burden estimate for purposeful sample of 30 HUSSC schools and their SFAs)**

<b>Respondent</b>	<b>Estimated Number of Respondents</b>	<b>Responses Annually per Respondent</b>	<b>Total Annual Responses</b>	<b>Estimated Average Number of Hours per Response</b>	<b>Estimated Total Annual Hours of Response Burden</b>
<b>SFA Directors</b>					
<b>SFA Director Survey</b>					
Completed interviews	630	1.00	630	0.4175	263.025
Nonresponses	158	1.00	158	0.0500	7.900
<b>SFA Recruitment Interview</b>					
Completed interviews	330	1.00	330	0.3006	99.198
Non responses	83	1.00	83	0.0500	4.150
<b>Total for SFA Directors</b>					
Completed interviews	630	1.00	960	0.3785	363.360
Nonresponses	158	1.00	241	0.0500	12.050
<b>School Food Service Managers</b>					
<b>School Food Service Manager Survey</b>					
Completed interviews	930	1.00	930	0.3340	310.620
Nonresponses	49	1.00	49	0.0500	2.450
<b>Menu Survey</b>					
Completed interviews	930	1.00	930	6.1002	5,673.186
Nonresponses	49	1.00	49	0.0500	2,450
<b>Total for School Food Service Managers</b>					
Completed interviews	930	1.00	1,860	3.2171	5,983.806
Nonresponses	49	1.00	98	0.0500	4,900
<b>Principals</b>					
Completed interviews	884	1.00	884	0.3340	295.256
Nonresponses	95	1.00	95	0.0500	4.750
<b>School Liaisons</b>					
Completed checklists	884	1.00	884	0.5000	442.000
Nonresponses	95	1.00	95	0.0500	4.750
<b>Total Responding Burden</b>	3,725	1.00	5,117	1.3897	7,110.872

Table A.2 shows estimated annualized hourly costs to respondents, including respondents at the purposeful sample of 30 HUSSC schools and their SFAs. Hourly wage rates used in the table are based on wage rates reported by the Bureau of Labor Statistics, specifically, the May 2007 national industry-specific occupational employment and wage estimates reported for elementary and secondary schools.

**Table A.2—Annualized Cost to Respondents (including cost estimate for purposeful sample of 30 HUSSC schools and their SFAs)**

<b>Respondent</b>	<b>Estimated Number of Respondents</b>	<b>Estimated Average Number of Hours per Response</b>	<b>Estimated Total Annual Hours of Response Burden</b>	<b>Estimated Hourly Wage Rate</b>	<b>Estimated Respondent Cost</b>
<b>SFA Directors</b>					
<b>SFA Director Survey</b>					
Completed interviews	630	0.4175	263.025	\$22.46	\$5,907.54
Nonresponses	158	0.0500	7.900	\$22.46	\$177.43
<b>SFA Recruitment Interview</b>					
Completed interviews	330	0.3006	99.198	\$22.46	\$2,227.99
Nonresponses	83	0.0500	4.150	\$22.46	\$93.21
<b>School Food Service Managers</b>					
<b>School Food Service Manager Survey</b>					
Completed interviews	930	0.3340	310.620	\$13.86	\$4,305.19
Nonresponses	49	0.0500	2.450	\$13.86	\$33.96
<b>Menu Survey</b>					
Completed interviews	930	6.1002	5,673.186	\$13.86	\$78,630.36
Nonresponses	49	0.0500	2.450	\$13.86	\$33.96
<b>Principals</b>					
Completed interviews	884	0.3340	295.256	\$39.52	\$11,668.52
Nonresponses	95	0.0500	4.750	\$39.52	\$187.72
<b>School Liaisons</b>					
Completed checklists	884	0.5000	442.000	\$17.28	\$7,637.76
Nonresponses	95	0.0500	4.750	\$17.28	\$82.08
<b>Total</b>	3,725				\$110,985.71

### **13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers**

There are no capital/start-up or ongoing operation/maintenance costs associated with this information collection.

### **14. Annualized Cost to Federal Government**

The total estimated cost of the information collection is \$4,258,741 over a 37-month period, for an annualized cost of \$1,377,970. This includes the costs associated with the contractor conducting the project and the salary of the assigned FNS project director. This cost includes all study tasks, including design, pretests, sample selection, recruitment, information collection, analysis, and report writing.

### **15. Explanation for Program Changes or Adjustments**

This collection is a reinstatement of a previously approved information collection resulting in a program change of 7,111 burden hours. Additionally, SNDA-IV will not collect data from individual students or their parents.

### **16. Plans for Tabulation and Publication and Project Time Schedule**

The contractor will analyze the information collected and prepare a comprehensive report as well as a summary report oriented toward lay audiences. Analysis of the total sample of HUSSC schools, including those HUSSC schools in SNDA-IV's core probability sample, and their SFAs will be conducted separately from the analysis conducted for all schools and SFAs in the core probability sample of SNDA-IV. However, HUSSC results will be presented in a section of the overall draft and final reports for SNDA-IV. All reports will be posted on FNS's website (<http://www.fns.usda.gov/ora/menu/>) Many of the tabulations will mirror those

completed for the final report of the SNDA-III study, providing an opportunity to revisit key topic areas five years later. Additional tabulations, using new or expanded data collected for the first time in SNDA-IV, will also be included. Several table shells that illustrate the types of tabulations planned are provided in Appendix O.

For each of the three research questions identified in Section A.1, the analysis will follow four key steps:

- ***Prepare Analytic Files.*** Each data file will be checked for missing or inconsistent data and outliers and then cleaned and recoded as necessary. For the web-based surveys, data cleaning will be minimal because of established response options and controlled skip patterns. Data cleaning for the checklists will be relatively straightforward. The menu survey data will undergo a more detailed data checking and cleaning process, followed by a coding step that will link foods reported in the surveys to a nutrient database. The menu survey data will be checked and coded by highly trained and skilled staff.
- ***Prepare Sampling Weights (for core probability sample).*** The data will be weighted to produce nationally representative tabulations for three levels of analysis (SFA, school, student). For SFAs and schools, raw sampling weights will be the inverse of the probability of selection for each observation. Weights will be adjusted for non-response and may be post-stratified to match key benchmarks. The student-level weights will provide estimates of the number of students enrolled in SFAs and schools with specific characteristics. The weighting factor will be the number of students enrolled in the SFA or school, multiplied by the SFA or school weight.
- ***Specify Tabulations.*** For each research question, researchers will specify tabulations to be prepared for SFAs or schools nationally and for subgroups of policy interest, for example, the method used to plan menus. Data on the nutrient content of school lunches and breakfasts will be compared to existing program standards and, potentially, to alternative standards, such as those proposed by the IOM panel mentioned previously. As appropriate, analyses will be compared to results from previous SNDA studies, recognizing that there are methodological limitations to such comparisons.
- ***Estimate Descriptive Statistics, Including Cross-Tabulations, Using Appropriate Statistical Methods.*** All of the planned analyses will involve straightforward frequencies, means, and cross-tabulations. Analyses will be conducted using statistical software such as SUDAAN or STATA to compute standard errors that adjust for the complex sample design (See Section B). Statistical tests for differences between key subgroups will also be conducted where sample sizes permit.

## **Project Time Schedule**

The planned schedule for SNDA-IV, assuming receipt of OMB clearance by late August or early September 2009, is as follows:

<b>Activity</b>	<b>Schedule</b>
Recruit SFAs	0–7 months after OMB approval
Conduct Data Collection	1–10 months after OMB approval
Prepare Data Files	3–16 months after OMB approval
Analyze Data and Prepare Final Report	10–36 months after OMB approval

### **17. Reason(s) Display of OMB Expiration Date is Inappropriate**

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

### **18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions to the certification statement.