

**Special Nutrition Program Operations Study
(SNPOS)**

**Statement for Paperwork Reduction Act
Submission**

Part A: Justification

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INTRODUCTION

The objective of the Special Nutrition Program Operations Study (SNPOS) is to collect timely data on policies, administrative, and operational issues on the Child Nutrition Programs. The ultimate goal of the study is to analyze these data and provide input for new legislation on Child Nutrition Programs as well as to provide pertinent technical assistance and training to program implementation staff. SNPOS will help the Food and Nutrition Service (FNS) at the United States Department of Agriculture (USDA) better understand and address current policy issues related to Special Nutrition Program (SNP) operations. The policy and operational issues include, but are not limited to, the preparation of the program budget, development and implementation of program policy and regulations, and identification of areas for technical assistance and training. Specifically, this study will help FNS obtain:

- General descriptive data on the Child Nutrition (CN) program characteristics to help FNS respond to questions about the SNPs in schools;
- Data related to program administration for designing and revising program regulations, managing resources, and reporting requirements; and
- Data related to program operations to help FNS develop and provide training and technical assistance for School Food Authorities (SFAs) and State Agencies responsible for administering the CN program.

The study includes data collection activities during a base year and two option years. During the Base Year, surveys will be conducted with all State Agency Child Nutrition Directors and a sample of SFA Directors. If exercised,

Option Years 2 and 3 will include follow-up surveys with SFA Directors and State Agency Child Nutrition Directors that participated in the Base Year. The surveys will be designed to provide a cross-sectional “snapshot” of CN program characteristics as well as longitudinal estimates of year-to-year changes in operations. Specific issues to be addressed by each survey will be determined in consultation with FNS staff based on their current policy needs.

In addition to the follow-up surveys with SFA Directors and State Child Nutrition Directors, Option Years 2 and 3 may expand data collection to include two new activities: (1) on-site data collection at a sample of 125 SFAs and (2) a survey of elementary, middle, and high schools nested within the SFAs that participated in the Base Year. On-site data collection may include: observation of school meals; observation of competitive food availability; interviews or focus groups with principals, kitchen staff, parents or students; or review of financial records with school food service staff and/or business managers. The school survey will be used to gather information about how schools implement the School Breakfast Program (SBP) and National School Lunch Program (NSLP) that is not easily ascertainable from State Agencies or SFAs. FNS is not seeking approval at this time for these activities or respondent group. Once it has been determined that the options will be exercised, FNS will submit a revision of a currently approved collection and publish another 60 day Federal Register Notice.

PART A: JUSTIFICATION

A.1 Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

This study is necessary to implement Sec. 28(a)(1) of the Richard B. Russell National School Lunch Act. This legislation directs the U.S. Department of Agriculture (USDA) to carry out annual national performance assessments of the School Breakfast Program (SBP) and the National School Lunch Programs (NSLP).

SEC. 28. (42 U.S.C. 1769i) PROGRAM EVALUATION.

“(a) PERFORMANCE ASSESSMENTS.—

(1) IN GENERAL.—Subject to the availability of funds made available under paragraph (3), the Secretary, acting through the Administrator of the Food and Nutrition Service, may conduct annual national performance assessments of the meal programs under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.).”

The Study

This study involves the development of an on-going modular data collection system for collection of data on policy and operational issues related to the Child Nutrition (CN) program operations. Such a data collection system will allow FNS to collect cross-sectional and longitudinal data (using selected

modules or varying modules at different time points) and enable FNS to respond more quickly and effectively to requests for policy-relevant analyses. In addition, the grouping of related topics and recurring nature of the survey will reduce FNS's information collection costs, lessen respondent burden, and reduce the data collection period. Specifically, this study will provide up-to-date information about the nature of current CN program implementation, administration, and operation, to better inform future policy development.

The policy and operational issues covered in the survey will include the preparation of the program budget, development and implementation of program policy and regulations, and identification of areas for provision of technical assistance and training. The data will be collected from a nationally representative sample of directors of School Food Authorities (SFAs) and a census of the State Agency Child Nutrition Directors during School Year (SY) 2010-2011. The study includes data collection activities during a base year and two additional option years. For the option Years 2 and 3, two new data collection activities may encompass (1) an on-site component involving observational studies and in-depth interviews or focus groups and a review of financial records; and (2) a survey of elementary, middle, and high schools nested within the SFAs that participated in the Base Year survey. This OMB Package is for planned data collection activities in Year 1; a separate OMB package will be submitted for data collections proposed in Years 2 and 3.

FNS is not seeking approval at this time for these activities or respondent groups. Once it has been determined that the options will be exercised, FNS will submit a revision of a currently approved collection and publish another 60 day FRN.

a. Program background

The USDA's five CN Programs include the National School Lunch Program (NSLP), School Breakfast Program (SBP), Fresh Fruit and Vegetable Program (FFVP), Food Distribution Program (FDP), and the Special Milk Program (SMP). These programs are designed to improve the nutritional quality of participating children's diet. Eligibility to participate in the child nutrition food programs is based on family income. Children living in families earning at or below 130 percent of poverty qualify for free meals (\$28,665 for a family of four during the 2009-2010 school year); those living in families with incomes between 130 percent and 185 percent of poverty pay a reduced price for meals (185% of poverty was \$40,793 for a family of four during the 2009-2010 school year). These CN programs have provided a safety net for school-age children with increasing emphasis on improving their nutritional status. On an average day in 2009, reduced priced or free meals were served through the SBP and the NSLP to 11 million and 31.2 million children respectively. Only the NSLP and SBP Programs are permanently authorized, the other CN programs must be reauthorized every five years. In 2010, FNS issued 32 policies on various aspects of the CN programs, ranging from

equipment assistance grants, farm to school, eligibility criteria, and geographic preference for the procurement of unprocessed agricultural products in CN programs among others. The CN funding represents an investment to remove barriers that keep children from participating in these programs, improve quality of school meals, and implement health promoting policies.

b. Previous studies

Since 1991, the FNS has completed several studies to assess various aspects of the Child Nutrition Program Policies, Administration, and Operational issues. FNS completed a three year (1989-1991) Child Nutrition Operations Program Study (CNOPS: OMB Number: 0584-0375. Expiration Date: 12/31/1992) involving data collection from a nationally representative sample of SFA Directors and State Agency staff. The survey instruments were tailored to address various aspects of program operations; unique aspects were added in lieu of relevant issues each year. Similarly, FNS completed a three year (2000-2002) School Meals Initiative Implementation Study (SMI - OMB# 0584-0485, Expiration Date: 3/31/2002) to gather information on CN program characteristics and Operational issues. Once every ten years, the FNS gathers data on the nutritional contribution of school meals to the diets of children, with the most recent data available from School Nutrition Dietary Assessment Study- IV (SNDA-IV - OMB Number: 0584-0527. Expiration Date: 9/30/2012). While SNDA gathered data exclusively on nutritional contribution of school meals, subsequent surveys

have provided data on various aspects of the school environment and meal operations, including school policies on availability of competitive foods, wellness, and food safety. Collection of ongoing data on various aspects of program operations has allowed FNS to respond to various issues in a timely manner, such as enforcing strict guidelines for school nutrition programs, developing programs to allow schools to track compliance with guidelines, and offering technical assistance and trainings to ensure program operations.

A.2 Indicate how, by whom, how frequently, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

a. Study objectives

The purpose of this study is to implement a modular data collection system and collect routine data on specific aspects of the child nutrition program, specifically on the program characteristics, administration, and operation of CN programs. The findings from this study will be used to identify program operational and policy issues, and topics for technical assistance and training. The research questions corresponding to each issue are detailed in Appendix A.

b. From whom will the information be collected?

Out of the 1,765 SFA Directors and 56 State Agency Directors sampled, the information will be collected from a nationally representative sample of approximately 1500 SFA directors and 53 State Agency Directors. SFA and

State Agency CN Directors will be the primary source of information for all data collected in the base year (2011).

c. How will the information be collected?

Survey of School Food Authority (SFA) Directors

All sampled SFA directors will be mailed an invitation letter (Appendix B1) beginning September 15, 2011, requesting their participation in the study. The invitation letter will alert the SFA directors to the availability of the enclosed hard copy survey on the web, along with the URL, secure login, and password. For any mail packages that are returned as undeliverable, we will call the SFA director to obtain the correct address information. Those packages will then be re-sent using the corrected information. Included in the introductory letter will be information on how to reach our study Help Desk. The Help Desk number (1-888-202-1565) will be answered by one of our professional interviewers during regular business hours. A message will be left after regular hours, and any action needed will be taken on the next business day. Given the breadth and depth of information to be collected through these surveys, respondents who opt to complete the survey on the Web will be provided with the opportunity to save their progress and complete the survey in more than one sitting. In addition, the SFA director will be able to share the login and password information with other staff to complete particular sections or questions included in the survey. The SFA

directors or their designee will be responsible for ensuring that all sections of the survey are completed before it is submitted or returned by mail.

WEEK 2 - One week after the initial mailing, we will either call the SFA director or send an email (Appendix B.2), if an email address is known, to verify that the survey package was received (beginning September 22, 2011). The email will include a link to the web address (www.SFANutritionSurvey.org) and the username and password to log-in and complete the web survey. The SFA director will be asked to confirm by email that they have received the information. For SFA directors with no email address available on file, a postcard reminder (Appendix B.3) will be sent beginning September 22, 2011. Replacement hardcopy surveys will be mailed to SFA directors upon request.

WEEK 3 - If hard copy or web surveys have not been initiated or completed by week three of the data collection, post cards or emails will be sent to the SFA directors to remind them to respond to the survey.

WEEK 4 - For those surveys still not completed by week four of the data collection, trained interviewers will call SFA directors, answer any questions about the study that they may have, and remind them to respond to the survey as soon as possible. The telephone calls will start around the 12th of October, 2011. The telephone script is in Appendix B.4.

WEEK 5 - A second reminder email or postcard will be sent during the fifth week. Additional non-response follow-up procedures will be added as needed.

The data collection effort for this study will span a 14-week period from September 15 to December 15, 2011. A thank you letter (Appendix B.5) will be mailed to all SFA directors who participated in the study at the end of the 13 week data collection period.

Survey of State Agency Child Nutrition (CN) Directors

All State Agency CN Directors will be mailed an invitation letter (Appendix B.6), requesting their participation in the study (beginning September 15, 2011) and completion of the accompanying hardcopy of the survey instrument. A 'reminder' email will be sent one week after the mailing to confirm that the package had arrived and to provide helpdesk contact information for any respondents who needed assistance beginning September 17, 2011. In instances where the surveys are not returned within 2 weeks, interviewers will call to see if the State Agency directors might prefer to complete the survey by telephone (beginning October 12, 2011). If requested, we will again send them another hardcopy of the survey instrument and follow-up with a phone call after about a week. Additional non-response follow-up procedures will be added as needed.

The data collection duration for the Survey of State Agency CN Directors will span a 14 week period from September 15 through December 15, 2011. A thank you letter will be mailed to all State Agency CN Directors who participated in the study at the end of the 13 week data collection period (Appendix B.7).

d. How frequently will the information be collected?

The data will be collected annually for a 3 year period. Sampled SFA and all State Agency CN Directors will complete the survey once each year (See Appendix C and D respectively for the two surveys). The questions in the modular survey instrument may be used in subsequent years. Some questions have been drawn and modified from surveys conducted by FNS under prior studies.

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 be 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 <http://www.fns.usda.gov/fns/>.

A.3 Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.

FNS is committed to complying with the E-Government Act, 2002 to promote the use of technology. While mail surveys are the primary mode of data collection from SFA and State Agency CN Directors, the SFA Directors have the opportunity to complete a web-based survey. The SFA Directors will be contacted by telephone to encourage and remind them to complete the survey and to try to get a commitment of a date by which they will complete the survey. The State Agency CN Directors who do not complete the mail survey will be contacted by telephone, and data will be collected in an interviewer-administered survey mode. FNS estimates that about half of the SFA Directors will complete a web-based survey.

A.4 Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purpose described in item 2 above.

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

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

Information being requested or required has been held to the minimum required for the intended use. Although smaller States and SFAs are 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.

A.6 Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The proposed data collection plan calls for annual data collection. Gathering such data on an annual basis is essential to track the characteristics of the CN programs. In addition, ongoing changes to the programs are accompanied by parallel changes in administrative and operational issues. The nutritional well-being of our nation's youth, including health implications, has become an important policy issue. Collecting the information less frequently would obstruct the agency's ability to keep abreast of the issues in administration and operation of these programs thereby delaying the discussion, formulation, and implementation of suitable policies.

A.7 Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

A.8 If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments.

Notice of this study was published in the Federal Register on November 5, 2010 (Volume 75, Number 214, Page 68316-17). FNS received one response from the School Nutrition Association (SNA) to the Federal Register Notice.

a. Consultations outside the agency

FNS contracted with Westat to conduct the SNPOS study. Westat developed a detailed data collection plan and a study and analysis plan that was submitted for review to FNS. Members of several division staff members (Child Nutrition, Food Safety, Food Distribution, and the Office of Research and Analysis) who have in-depth knowledge of the topic areas studied the data collection and the study and analysis plan and provided feedback to Westat.

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

Respondents will not receive any incentive payment for completing the survey in the base year or optional years.

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

While the resulting findings and dataset is in the public domain, 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.

A.11 Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

This study does not contain questions of a sensitive nature.

A.12 Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table A1 shows the estimates of the respondent burden for the proposed data collection. These estimates reflect consultations with program officials, and the contractor's prior experience in collecting data. Table A2 shows the estimated annualized cost to respondents. It has been calculated using average hourly earnings for May 2009 obtained from the Bureau of Labor Statistics' estimates for occupational employment wages.

Table A1. Estimates of respondent burden

(a) Type of responde nts	(b) Type of survey instrumen ts	(c) Number of responde nts	(d) Frequenc y of response	(e) Total Annual responses	(f) Average burden hours per questionn aire	(g) Total annual hour burden
SFA Directors	Hard copy survey for pre-test	7	1	7	2.75 hours	19.25 hours
SFA Directors	Online/hard copy survey	1,500	1	1,500	1.75 hours	2,625 hours
SFA Directors	Non- responders	265	1	0	5 minutes	22 hours
State Directors	Hard copy pre-test	3	1	3	1.75 hours	5.25 hours
State Directors	Hard copy/ telephone survey	53	1	53	1.75 hours	93 hours
State Directors	Non- responders	3	1	3	5 minutes	.25 hours
TOTAL		1,831	-	1,831	-	2,764.75 hours

Table A2. Annualized cost to respondents

Type of respondents	Type of survey instruments	Average time per response	Number of respondents	Frequency of response	Hourly wage rate	Respondent cost
SFA Directors	Hard copy survey for pre-test	2.75 hours	7	1	\$23.72	\$456.61
SFA Directors	Online/hard copy survey	1.75 hours	1,500	1	\$23.72	\$62,265.00
SFA Directors	Non-responders	5 minutes	265	1	\$23.72	\$523.82
State Directors	Hard copy survey for pre-test	1.75 hours	3	1	\$37.72	\$198.03
State Directors	Hard copy/ telephone survey	1.75 hours	53	1	\$37.72	\$3,507.96
State Directors	Non-responders	5 minutes	3	1	\$37.72	\$9.43
TOTAL			1,831			\$66,960.85

A.13 Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

There are no other costs to respondents beyond those presented in section A.12.

A.14 Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.

The largest cost to the federal government is to pay a contractor \$1,000,000 to conduct the study and deliver data files. This is based on an estimate of 7,418 hours, with a salary range of \$30.46 - \$236.60/ hour. This contract

cost includes overhead costs as well as the cost for computing, copying, supplies, postage, shipping, setting up the website, and other miscellaneous items. This information collection also assumes that a total of 20 hours of Federal employee time: for a GS-14, step 5 Branch Chief at \$45.32 per hour for a total of \$906.40 and Federal staffing cost of \$676.87 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2011.)

A.15 Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is new data collection. This program change will add 2,764.75 burden hours to the OMB collection inventory.

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

The project time schedule is in Table A3 below. The project started on July 23, 2010. The school year under study began in August 2010 and will end on June 30, 2011. FNS expects the first year of the SNPOS study completed by December 30, 2011. Selecting and recruiting SFAs and recruiting State Directors will begin soon after obtaining OMB approval. Data collection will begin by the 15th of March and run through June 15th, 2011. Data file preparations will follow immediately so that data analysis could begin by June 30, 2011. The draft Base Year report will be submitted to FNS by October 7th, and presentation materials will be submitted by December 30th.

There will be two types of products resulting from the analysis of data:

Analytic data tables and a Base Year report using data analysis.

Table A3. Data collection schedule

Activity	Due date
Conduct feasibility and pretest of SFA and State Director surveys	November 15–December 30, 2010
Data Collection (SFA Survey and State CN Director Survey)	September 15–December 15, 2011
Mail invitation letter to SFA Directors	September 15, 2011
Mail invitation letter to State CN Directors	September 15, 2011
Email/Postcard sent out to SFA Directors verify receipt of survey package	September 22, 2011
Email/Postcard reminder sent out to SFA Directors & State CN Directors	September 29, 2011
Another reminder sent out SFA Directors	October 5, 2011
Telephone calls to State CN Directors to conduct survey	October 12, 2011
Telephone calls to SFA Directors to answer questions and remind them to complete the survey	October 12, 2011
Thank you letter mailed to SFA Director after completion of survey	October 1- As needed
Data Analysis and Reporting	January 2 - May 30, 2012
Publication of findings	June 30, 2012

a. Analysis of the Study Data

The analysis of the Base Year data will be cross-sectional in nature and serve to provide a “snapshot” of the CN program characteristics and operations.

Descriptive statistics including frequency distributions and cross tabulations will be generated for each research question; all analysis will be stratified by grade level, SFA size, poverty level, and other characteristic as appropriate.

The subgroups based on SFA size and poverty level will be defined as follows:

- SFA size (1-999; 1,000 to 4,999; 5,000-24,999; 25,000 or more); and

- Poverty level (60 percent or more free/reduced-price eligible students; less than 60 percent free/reduced-price eligible students).

The SFA survey data will be weighted so that estimates are nationally representative of SFAs; variance estimation methods that appropriately reflect the complex sampling design (see section on weighting and variance estimation) will be used. The State Agency census does not require weighting or complex variance estimation, since it is not a sample. Where appropriate, we will go beyond simple cross-tabulations and use multivariate statistical models to examine the relationship between two variables controlling for covariates. Statistical models are frequently developed in our projects to illuminate program processes. For example, we may develop models of outcome measures, such as meal participation rates and prices, as a function of food program characteristics.

b. Methods of Dissemination

A final report will be produced by the Contractor. The final report will be available in its entirety on the FNS website.

A.17 If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

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

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

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