

**Special Nutrition Program Operations Study  
(SN-OPS)**

**Statement for Paperwork Reduction Act  
Submission**

**Revision of current OMB Number 0584-0562**

**Part A: Justification**

**January 30, 2013**

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## **INTRODUCTION**

The objective of the Special Nutrition Program Operations Study (SN-OPS) (OMB Number 0584-0562; Expiration date: 9/30/2014) 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. SN-OPS 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 (School Year (SY) 2011-12), surveys were conducted with all State Child Nutrition Directors and a sample of SFA

Directors. FNS has exercised Option Year 1 (Study Year 2), for which this OMB Package is being submitted. Option Year 1 will include: (1) follow-up surveys with a sample of SFA Directors and all State Child Nutrition Directors that participated in the base year and (2) an on-site data collection to capture information on competitive foods in a sample of schools. The sample for the SFA Director survey will be enhanced so the overall sample will remain consistent across years. The sample for the followup survey will include a majority of SFAs that participated during the base year plus additional SFAs drawn from the *Verification Summary Report* data (known as FNS-742) (OMB Number 0584-0026; Expiration Date 3/31/2013) for SY (2011-12), which includes SFAs new to the 2011-12 FNS-742 verification database.

The surveys have been revised with many of the sections from the base year survey (SY 2011-12) replaced with new sections on topics pertinent to FNS' current policy needs (see Appendix A for a crosswalk of the changes made to the SFA Director survey and Appendix B for the changes made to the State Child Nutrition Director Survey). These surveys are designed to provide a cross-sectional "snapshot" of CN program characteristics as well as longitudinal estimates of year-to-year changes in operations.

On-site data collection will include: 1) observations of school meals (breakfast and lunch) including physical characteristics of the cafeterias and 2) identification of alternate food sources (e.g., school stores, snack bars, vending machines, food carts, etc.) including location, hours of operation,

and the types of food available. As part of the data collection, the data collectors will talk to the school food service managers and record any strategies that the SFAs are implementing to encourage healthy food choices.

## **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 surveys 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. During Option Year 1, the data will be collected from a nationally representative sample of SFA Directors and a census of the State Child Nutrition Directors during SY 2012-2013. This will be the follow-up to the base year data collection conducted during SY 2011-2012 from a nationally representative sample of SFA Directors and a census of the State Child Nutrition Directors. Additionally, during Option Year 1, there will be on-site data collection to capture information on competitive foods from a nationally representative sample of 125 SFAs. If FNS decides to exercise Option Year 2, the SFA Director and State Child Nutrition Director surveys will be conducted and potentially another round of on-site data collections and a survey of elementary, middle, and high school principals.

This OMB Package is for planned data collection activities in Option Year 1; a separate OMB package will be submitted for data collections proposed in Option Year 2. FNS is not seeking approval at this time for the Option Year 2 activities or respondent groups. Once it has been determined whether the option will be exercised, FNS will submit a revision of a currently approved collection.

## **a. Program background**

The USDA-FNS administers the Federal child nutrition food programs that provide nutritionally balanced meals and snacks to eligible children through 18 years of age.<sup>1</sup> Five major food assistance programs serve the nutritional needs of school children: 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 diets. 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 (\$29,965 for a family of four during July 1, 2012, through June 30, 2013); those living in families with incomes between 130 percent and 185 percent of poverty pay a reduced price for meals (185% of poverty is \$42,643 for a family of four during July 1, 2012, through June 30, 2013). These CN programs have provided a safety net for school-age children with increasing emphasis on improving their nutritional status. During the 2011 school year, NSLP provided lunch and after-school snacks to more than 32 million students each day in over 101,000 public and nonprofit private schools and in residential child care institutions nationwide. SBP provided breakfast to nearly 12 million students each day in over 88,000 schools. 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

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<sup>1</sup> Adults enrolled in school up to age 21 may participate in the school meals programs and persons under the age of 21 currently admitted to Residential Child Care Institutions (RCCI) as residents are also eligible to participate in the Federal child nutrition programs.

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.

In 2010, President Barack Obama signed the *Healthy, Hunger-Free Kids Act* (HHFKA) of 2010 into law. This law made numerous changes in USDA's child nutrition programs with the overarching goal of reducing childhood obesity and improving the diets of children. The final rules for the new Nutrition Standards were published in the *Federal Register* on January 26, 2012. These new Nutrition Standards are a significant departure from previous standards in that compliance is based on the specific food offered to students over a one-week period. The changes will result in the addition of more fruits, vegetables, and whole grains to school meals, while reducing calories, saturated fat, and sodium. SFAs that meet these standards will receive an additional 6 cents in reimbursement per meal. The new standards for school lunches began being implemented during the 2012-13 SY, with additional changes over a ten-year period. Standards for school breakfasts will be phased in over time beginning in SY 2013-14. When fully implemented, the HHFKA is expected to fundamentally change the way school foodservice operates.

## **b. Previous studies**

USDA-FNS has a long history of conducting research related to child nutrition. In the early 1990s FNS conducted the Child Nutrition Program Operations Study (CNOPS: OMB Number: 0584-0375. Expiration Date: 12/31/1992). This study collected data from States and participating SFAs through telephone surveys conducted annually during SY 1988-89, SY 1989-90, and SY 1990-91. It also collected data through on-site visits during SY 1989-90 and SY 1991-92. The study addressed the specific information needs for each data collection effort identified by FNS at the time. The surveys provided a “snapshot” of administrative structure and an assessment of year-to-year changes in program operations including program participation, meal prices, and meal costs, claims reimbursement, use of Food Service Management Companies, SFA food service program characteristics, and SFA training and technical assistance. The first year report was published in August 1991, the second year report in June 1992 and the third year report in January 1993.

The first School Nutrition Dietary Assessment Study (SNDA-I, 1993)<sup>2</sup> (SNDA: OMB Number 0584-0527; Expiration Date: 9/30/2012) was published in 1993 and showed that the fat and sodium content of school lunches was well above levels recommended in the 1990 Dietary Guidelines for Americans. These findings were instrumental in motivating efforts to improve the nutritional quality of school meals and changes in school meal program

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<sup>2</sup> <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/SNDA-Sum.pdf>

requirements. In subsequent studies (SNDA-II, 2001<sup>3</sup> and SNDA-III, 2007<sup>4</sup>), participation rates, availability of competitive foods in schools, local school wellness policies, erroneous reimbursements due to certification errors, meal counting, and claiming errors were examined. These studies have played a significant role in improving the child nutrition food program. A fourth SNDA study was completed and published in November 2012.

In the late 1990s FNS conducted the School Meals Initiative Implementation Study, a three-year study of USDA's school-based child nutrition programs(SMI - OMB# 0584-0485, Expiration Date: 3/31/2002). The study described and evaluated the overall implementation of the School Meals Initiative for Healthy Children, provided key operational characteristics of the school meals programs at both the school district and State Agency level, and identified training and technical assistance activities associated with the school meals programs. The School Meals Initiative Implementation Study first year report was published in October 2000,<sup>5</sup> the second year report in July 2001;<sup>6</sup> and the third year report in June 2002.<sup>7</sup>

The SN-OPS study will help inform USDA of up-to-date information about the nature of current child nutrition program implementation, administration, and operations, to better inform future policy development.

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<sup>3</sup> <http://www.fns.usda.gov/ora/MENU/Published/CNP/FILES/sndall.pdf>

<sup>4</sup> [http://www.mathematica-mpr.com/publications/redirect\\_pubsdb.asp?strSite=pdfs/SNDA3summ.pdf](http://www.mathematica-mpr.com/publications/redirect_pubsdb.asp?strSite=pdfs/SNDA3summ.pdf)

<sup>5</sup> <http://www.fns.usda.gov/ora/menu/published/cnp/files/smiyear1.pdf>.

<sup>6</sup> <http://www.fns.usda.gov/ora/menu/published/cnp/files/smiyear2.htm>.

<sup>7</sup> <http://www.fns.usda.gov/ora/menu/published/cnp/files/smiyear3.pdf>.

**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 C.

Information collected during SY 2011-2012 has provided FNS policy officials with information needed to address a number of policy issues prescribed in the Healthy, Hunger-Free Kids Act of 2010. For example, information collected from both State Agencies and SFAs on policies and/or standard practices related to providing children who are without funds with an alternate meal will be instrumental in the development of a report to Congress on the feasibility of establishing national standards for meal charges and the provision of alternate meals.

**b. From whom will the information be collected?**

SFA and State CN Directors and School Food Service Managers will be the primary source of information for all data collected in Option Year 1 (2012-13). The information will be collected from a nationally representative sample of approximately 1,500 SFA director respondents and 56 State Child

Nutrition Directors and a maximum of 375 School Food Service Managers associated with 125 SFAs.

**c. How will the information be collected?**

**Survey of State Child Nutrition Directors**

All State Child Nutrition Directors will be mailed an invitation letter (Appendix D1), requesting their participation in the study (beginning April 15, 2013) and completion of an accompanying hardcopy survey instrument (Appendix E). A 'reminder' email will be sent one week after the mailing to confirm that the package arrived and to provide helpdesk contact information for any respondents who need assistance beginning April 22, 2013 (Appendix D2). If the surveys are not returned within 2 weeks, interviewers will call (Appendix D3) to see if the State CN Director prefers to complete the survey by telephone (beginning May 6, 2013) (Appendix E). If requested, we will send another hardcopy survey and follow-up with a phone call after about a week.

The data collection for the Survey of State Child Nutrition Directors will span 9 weeks from April 15 through June 14, 2013. A thank you letter will be mailed to all State Child Nutrition Directors who participated in the study at the end of data collection (Appendix D4).



## **Survey of School Food Authority (SFA) Directors**

The SFA Director survey is web based (Appendix F). All sampled SFA Directors will be mailed an invitation letter (Appendix D5) beginning April 15, 2013 (WEEK 1), requesting their participation in the study. The invitation letter will alert the SFA Directors to the 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 invitation 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 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 session. However, if an SFA Director wants to complete a hard copy survey, they will be able to print a blank copy of the survey from the website or request a hard copy survey be sent to them. The SFA Director 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 send an email (Appendix D6), if an email address is known, to verify that the survey package was

received (beginning April 22, 2013). The email will include a link to the URL 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 for whom we do not have an email address on file, a postcard reminder (Appendix D7) will be sent beginning April 22, 2013.

WEEK 3 - If the web surveys have not been initiated or completed by week three of the data collection, postcards or emails will be sent to the SFA Directors to remind them to respond to the survey. If a hardcopy survey was sent and not yet returned completed a reminder postcard will be sent.

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 6<sup>th</sup> of May, 2013. The telephone script is in Appendix D8.

WEEKS 5 and 6 - Reminder emails and postcards will be sent during the fifth and sixth weeks. Additional non-response follow-up procedures will be added as needed.

The data collection effort for this study will span a 9-week period from April 15 to June 14, 2013. A thank you letter (Appendix D9) will be mailed to all SFA directors who participated in the study at the end of data collection.

## **On-site data collection to capture information on competitive foods**

On-site data collection will include: (1) observation of school meals (breakfast and lunch) including cafeteria activities and physical characteristics of the cafeteria and (2) identification of alternate food sources (school stores, snack bars, vending machines, food carts, etc.) including location, hours of operation, and the types of foods available. Data collectors will interview school food service managers and record any strategies SFAs have implemented to encourage healthy food choices.

The topics for the site visits were determined by FNS based on policy needs. A sample of 125 SFAs will be selected so as to cover a broad range of SFAs with respect to geography (FNS region), size category, and poverty status. Within the selected SFAs, a maximum of three schools will be selected for the in-person site visits, including where possible one elementary school, one middle school, and one high school per SFA. To enable linking of site visit observations with SFA survey data collected during the base year, the sample will be restricted to the 1,400 SFAs that completed the base year survey. Since these SFAs participated in the base year survey, they are aware of the study. Each visit will be conducted over a 2 to 3 day period.

**Preparing for the Site Visit:** Before the site visits are conducted there are several steps that need to be taken to ensure successful site visits:

- The first step required is the recruitment of sites. We will send letters to the 125 sampled sites informing the SFA Directors of the study and requesting their cooperation (Appendix D10). We will follow-up with telephone calls to answer any questions and discuss the timing of the visit and any necessary approvals.
- Initial contact with SFA Directors or designees: After the dates of the visit are established, we will confirm the schedule and arrangements in writing and send the discussion topics to the participants with the confirmation letter (Appendix D11). SFAs and schools sampled for the study will be contacted again 2-4 weeks before the scheduled visit to finalize the arrangements, confirming the timing of activities and contact information.
- Prior to the site visits, each site visit team member will be given a binder containing address and contact information of the SFA Director and food service managers, background information, and observation guides and interview forms.

**Conducting the Site Visit:** Staff will follow uniform site visit procedures to collect information about food service operations and competitive foods. Interview responses and observations on checklists will be marked as

appropriate. Although each visit will have a pre-developed schedule, the staff will be flexible during the visits and interviews.

**Observations:** For the observation component of the site visits, checklists and protocols will be developed that describe the focus of the observational components of the visit. The staff will be familiar with conducting interviews with school cafeteria managers, collecting observational material, and conducting site visits in schools. To prepare them for this particular assignment, they will participate in a one day training session devoted to the goals of the visits and the procedures for conducting the visits. Each site visitor in the field will conduct up to 2 site visits each week. We anticipate completing the site visits within 12 weeks.

**Conducting Follow-up Activities:** Following the site visit, site visitors will debrief and confirm with supervisors that all necessary information has been collected during the site visit. If some information is still needed, a follow-up telephone conversation will be conducted with the food service managers. A brief summary will be prepared following the visits.

**d. How frequently will the information be collected?**

The data from SFA Directors and State Child Nutrition Directors will be collected annually for a 3 year period. All State Child Nutrition Agencies and sampled SFAs will complete the respective survey once each year (See Appendix E and F respectively for the two surveys). Some of the questions in the modular survey instrument were used in the previous year. Some questions have been drawn and modified from surveys conducted by FNS under prior studies. The on-site data collection instruments are in Appendices G1 through G4—Food Service Manager (Appendix G1), Cafeteria Observation Guide (Appendix G2), Other Food Sources Checklist (Appendix G3), and Vending Machine Checklist (Appendix G4). Note that only the Food Service Manager interview (Appendix G1) involves data collection with respondents. On-site data collection via instruments G2 through G4 will be conducted by FNS contracting staff.

**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/research.htm>.

**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 State Child Nutrition Directors, the SFA Directors have the opportunity to complete a web-based survey. SFA Directors could opt to fill out a hard-copy of the survey if they prefer. 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 Child Nutrition Directors who do not complete the mail survey will be contacted by telephone, and data will be collected in an interviewer-administered survey mode. The site visit staff will use hard-copy check lists and interview forms to gather data.

**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 23 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 from SFA Directors and State Child Nutrition Directors. 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.



The on-site data collection to capture information on competitive foods will be a one-time data collection effort.

**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 the Code of Federal Regulations, 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 Wednesday, March 14, 2012 (Vol. 77, No. 50, pp. 15037-15038). FNS did not receive any responses to the Federal Register Notice.

**a. Consultations outside the agency**

Staff members of several FNS divisions (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 on this information collection.

(NASS comments)

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

The participants in the Option Year 1 survey will not receive an incentive payment.

**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 are 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 from the SFA Director survey will be presented in aggregate form and therefore cannot be linked back to the response of any individual school district. Only

publically available data from the State CN Director survey will be presented by state.

**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 Agency'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 2011 obtained from the Bureau of Labor Statistics' estimates for occupational employment wages.

**Table A.1 Estimates of Respondent Burden**

|                          |                           |  |              | Responsive   |                       |                       |                        |                    | Non-Responsive        |                           |                       |                        |                    | Total Annual hour burden |                       |
|--------------------------|---------------------------|--|--------------|--------------|-----------------------|-----------------------|------------------------|--------------------|-----------------------|---------------------------|-----------------------|------------------------|--------------------|--------------------------|-----------------------|
|                          | Type of respondents       | Type of survey instruments             | Appendix     | Sample Size  | Number of respondents | Frequency of response | Total Annual responses | Hours per response | Annual burden (hours) | Number of Non-respondents | Frequency of response | Total Annual responses | Hours per response |                          | Annual burden (hours) |
| State / Local Government | State Directors           | Hard copy pre-test                     | N/A          | 3            | 3                     | 1                     | 3                      | 2                  | 6                     | 0                         | 1                     | 0                      | 1.75               | 0                        | 6.00                  |
|                          | State Directors           | Hard copy/ telephone survey            | E            | 53           | 50                    | 1                     | 50                     | 2                  | 100                   | 3                         | 1                     | 3                      | 0.08               | 0.25                     | 100.25                |
|                          | State Directors           | Invitation Letter*                     | D1           | 53           | 27                    | 1                     | 27                     | 0.05               | 1.35                  | 26                        | 1                     | 26                     | 0.00               | 0                        | 1.35                  |
|                          | State Directors           | Follow-up Email - Week 2*              | D2           | 26           | 13                    | 1                     | 13                     | 0.05               | 0.65                  | 13                        | 1                     | 13                     | 0.00               | 0                        | 0.65                  |
|                          | State Directors           | Telephone Script - Week 3*             | D3           | 13           | 7                     | 1                     | 7                      | 0.083              | 0.583                 | 6                         | 1                     | 6                      | 0.00               | 0                        | 0.58                  |
|                          | State Directors           | Follow-up Email - Week 5*              | D2           | 6            | 3                     | 1                     | 3                      | 0.05               | 0.15                  | 3                         | 1                     | 3                      | 0.00               | 0                        | 0.15                  |
|                          | State Directors           | Thank You Letter                       | D4           | 50           | 50                    | 1                     | 50                     | 0.05               | 2.5                   | 0                         | 0                     | 0                      | 0.00               | 0                        | 2.50                  |
|                          | SFA Directors             | Hard copy survey for pre-test          | N/A          | 7            | 7                     | 1                     | 7                      | 3                  | 21                    | 0                         | 1                     | 0                      | 2.75               | 0                        | 21.00                 |
|                          | SFA Directors             | Online/hard copy survey                | F            | 1,875        | 1,500                 | 1                     | 1,500                  | 3                  | 4,500                 | 375                       | 1                     | 375                    | 0.083              | 31.25                    | 4,531.25              |
|                          | SFA Directors             | Invitation Letter                      | D5           | 1,875        | 563                   | 1                     | 563                    | 0.05               | 28.15                 | 1,312                     | 1                     | 1,312                  | 0.00               | 0                        | 28.15                 |
|                          | SFA Directors             | Reminder Email or Postcard - Week 2**  | D6/D7        | 1,312        | 328                   | 1                     | 328                    | 0.05               | 16.40                 | 984                       | 1                     | 984                    | 0.00               | 0                        | 16.40                 |
|                          | SFA Directors             | Reminder Email or Postcard - Week 3**  | D6/D7        | 984          | 246                   | 1                     | 246                    | 0.05               | 12.30                 | 738                       | 1                     | 738                    | 0.00               | 0                        | 12.30                 |
|                          | SFA Directors             | Follow-up Phone Call - Week 4**        | D8           | 738          | 185                   | 1                     | 185                    | 0.083              | 15.42                 | 553                       | 0                     | 0                      | 0.00               | 0                        | 15.42                 |
|                          | SFA Directors             | Reminder Email or Postcard - Week 5**  | D6/D7        | 553          | 111                   | 1                     | 111                    | 0.05               | 5.55                  | 442                       | 1                     | 442                    | 0.00               | 0                        | 5.55                  |
|                          | SFA Directors             | Reminder Email or Postcard - Week 6**  | D6/D7        | 442          | 67                    | 1                     | 67                     | 0.05               | 3.35                  | 375                       | 1                     | 375                    | 0.00               | 0                        | 3.35                  |
|                          | SFA Directors             | Thank You Letter                       | D9           | 1,500        | 1,500                 | 1                     | 1,500                  | 0.05               | 75.00                 | 0                         | 0                     | 0                      | 0.00               | 0                        | 75.00                 |
|                          | School Cafeteria Managers | Hard copy survey for pre-test          | N/A          | 3            | 3                     | 1                     | 3                      | 1.00               | 3.00                  | 0                         | 1                     | 0                      | 0.50               | 0                        | 3.00                  |
|                          | School Cafeteria Managers | On-site Food Service Manager Interview | G1           | 375          | 375                   | 1                     | 375                    | 0.50               | 187.50                | 0                         | 0                     | 0                      | 0.50               | 0                        | 187.50                |
|                          | SFA Directors             | On-site Collection Invitation Letter   | D10          | 125          | 125                   | 1                     | 125                    | 0.50               | 62.50                 | 0                         | 1                     | 0                      | 0.50               | 0                        | 62.50                 |
|                          | SFA Directors             | On-site Confirmation Letter            | D11          | 125          | 125                   | 1                     | 125                    | 0.17               | 20.83                 | 0                         | 0                     | 0                      | 0.17               | 0                        | 20.83                 |
| <b>TOTAL</b>             |                           |  | <b>2,316</b> | <b>1,938</b> | <b>2.73</b>           | <b>5,288</b>          | <b>0.957</b>           | <b>5,062.23</b>    | <b>378</b>            | <b>11.31</b>              | <b>4,277</b>          | <b>0.007</b>           | <b>31.50</b>       | <b>5,093.73</b>          |                       |

\* Based on approximately 50% response rate for each contact until target of 50 respondents is reached.  
 \*\* Based on declining response rate on each subsequent contact until target of 1,500 respondents is reached. Initial response rate is 30%.

Table A2. Annualized cost to respondents

| Type of respondents              | Type of survey instruments             | Total Annual hour burden | Hourly Wage | Respondent Cost      |
|----------------------------------|--|--------------------------|-------------|----------------------|
| <b>State Directors</b>           | Hard copy pre-test                     | 6.00                     | \$ 37.72    | \$ 226.32            |
| <b>State Directors</b>           | Hard copy/ telephone survey            | 100.25                   | \$ 37.72    | \$ 3,781.43          |
| <b>State Directors</b>           | Invitation Letter                      | 1.35                     | \$ 37.72    | \$ 50.92             |
| <b>State Directors</b>           | Follow-up Email - Week 2               | 0.65                     | \$ 37.72    | \$ 24.52             |
| <b>State Directors</b>           | Telephone Script - Week 3              | 0.58                     | \$ 37.72    | \$ 22.00             |
| <b>State Directors</b>           | Follow-up Email - Week 5               | 0.15                     | \$ 37.72    | \$ 5.66              |
| <b>State Directors</b>           | Thank You Letter                       | 2.50                     | \$ 37.72    | \$ 94.30             |
| <b>SFA Directors</b>             | Hard copy survey for pre-test          | 21.00                    | \$ 25.30    | \$ 531.30            |
| <b>SFA Directors</b>             | Online/hard copy survey                | 4,531.25                 | \$ 25.30    | \$ 114,640.63        |
| <b>SFA Directors</b>             | Invitation Letter                      | 28.15                    | \$ 25.30    | \$ 712.20            |
| <b>SFA Directors</b>             | Reminder Email or Postcard- Week 1     | 16.40                    | \$ 25.30    | \$ 414.92            |
| <b>SFA Directors</b>             | Reminder Email or Postcard - Week 2    | 12.30                    | \$ 25.30    | \$ 311.19            |
| <b>SFA Directors</b>             | Follow-up Phone Call - Week 3          | 15.42                    | \$ 25.30    | \$ 390.04            |
| <b>SFA Directors</b>             | Reminder Email or Postcard - Week 5    | 5.55                     | \$ 25.30    | \$ 140.42            |
| <b>SFA Directors</b>             | Reminder Email or Postcard - Week 6    | 3.35                     | \$ 25.30    | \$ 84.76             |
| <b>SFA Directors</b>             | Thank You Letter                       | 75.00                    | \$ 25.30    | \$ 1,897.50          |
| <b>School Cafeteria Managers</b> | Hard copy survey for pre-test          | 3.00                     | \$ 15.39    | \$ 46.17             |
| <b>School Cafeteria Managers</b> | On-site Food Service Manager Interview | 187.50                   | \$ 15.39    | \$ 2,885.63          |
| <b>SFA Directors</b>             | Onsite Collection Invitation Letter    | 62.50                    | \$ 25.30    | \$ 1,581.25          |
| <b>SFA Directors</b>             | On-site Confirmation Letter            | 20.83                    | \$ 25.30    | \$ 527.08            |
| <b>Total</b>                     |  | <b>5,093.73</b>          |             | <b>\$ 128,368.22</b> |

**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 total cost to the Federal government is \$1,651,143. The largest cost to the federal government is to pay a contractor \$1.65 million over a 16-month period to conduct Option Year 1 of the study and deliver data files. This is based on an estimate of 12,357 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 \$57.13 per hour for a total of \$1,142.60 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2012.

**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 a continuation of data collection from last year. Study Year 2, the subject of this ICR, includes: (1) follow-up surveys with a sample of SFA Directors and all State Child Nutrition Directors that participated in the base year and (2) an on-site data collection to capture information on competitive foods in a sample of schools. The revisions to the follow-up surveys and the on-site data collection (described in this supporting statement) result in an adjustment of 2,329 burden hours to the OMB collection inventory for this study.



**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 for the Option Year 1 began in August 2012 and will end on June 30, 2013. FNS expects the Option Year 1 of the SN-OPS study completed by December 30, 2013. Data collection will begin April 15 and run through June 14<sup>th</sup>, 2013. SFAs and schools will be recruited during February and March 2013 for the on-site data collection and on-site data collection will be from April 15-June 14, 2013. Data file preparations will follow immediately so that data analysis can begin by July 2, 2013. The draft Option Year 1 report will be submitted to FNS by October 7<sup>th</sup>, and presentation materials will be submitted by December 30<sup>th</sup>.

There will be three types of products resulting from the analysis of data: Analytic data tables and an Option Year 1 report using data analysis of the SFA director survey and the State Child Nutrition Director survey and a report based on the on-site data collection.

Table A3. Data collection schedule

| Activity  | Due date                     |
|---|------------------------------|
| Conduct feasibility and pretest of SFA and State Director surveys and Cafeteria Manger discussion guide | November 19-January 31, 2012 |
| Recruit SFAs and schools for on-site data collection  | Feb. 1 - April 15, 2013      |
| Data Collection (SFA Survey and State CN Director Survey)   | April 15 - June 14, 2013     |
| On-site data collection   | April 15 - June 14, 2013     |
| Mail invitation letter to SFA Directors   | April 15, 2013               |
| Mail invitation letter to State CN Directors  | April 15, 2013               |
| Email/Postcard sent out to SFA Directors verify receipt of survey package                               | April 22, 2013               |
| Email/Postcard reminder sent out to SFA Directors & State CN Directors                                  | April 22, 2013               |
| Another reminder sent out SFA Directors   | May 13, 2013                 |
| Telephone calls to State CN Directors to conduct survey   | Beginning May 6, 2013        |
| Telephone calls to SFA Directors to answer questions and remind them to complete the survey             | Beginning May 6, 2013        |
| Thank you letters mailed to State CN and SFA Directors  | June 17, 2013                |
| Data file preparation   | June 17-July 1, 2013         |
| Data Analysis and Reporting   | July 2- November 29, 2013    |
| Publication of findings   | December 30, 2013            |

**a. Analysis of the Survey Data**

The analysis of the Base Year data was cross-sectional in nature and provided a “snapshot” of the CN program characteristics and operations. Descriptive statistics including frequency distributions and cross tabulations were generated for each research question; all analyses were stratified by grade level, SFA size, poverty level, and other characteristic as appropriate. The subgroups based on SFA size and poverty level were defined as follows:

- SFA Enrollment size (1-999; 1,000 to 4,999; 5,000-24,999; 25,000 or more students); and
- Poverty level (60 percent or more free/reduced-price eligible students; less than 60 percent free/reduced-price eligible students).

For Option Year 1 we will conduct cross-sectional analyses similar to the prior year providing a “snapshot” of the current year and the new program data. Analyses of Option Year 1 data will be longitudinal as well, where appropriate. We will conduct cross-sectional analyses on any new research questions included in the Option Year 1 SFA or the State Child Nutrition Director surveys that were not included in the base year instruments. We will conduct longitudinal analyses over the two time periods for both surveys as appropriate. Longitudinal analyses of the SFA Director survey will focus on issues related to participation rates, meal prices, and expenditures and revenues.

Similar to the cross-sectional analyses in the base year, most of the longitudinal analyses will also be descriptive in nature. Base year estimates calculated will serve as “baseline” measures of the Option Year 1 outcomes. We will produce similar cross-tabulations by subgroups for Option Year 1 data and compare estimates to base year findings. In addition, we will also calculate the percent of States, or SFAs, that increase, decrease, or have no change on the outcome measure of interest and the average increase or decrease among those with a change. We will display the results separately for SFA size and poverty level for the cross-sectional analyses. When examining financial data, such as meal prices, revenues, or expenditures, we will present all data in constant dollars. Longitudinal analyses will be conducted only on respondent data with a complete set of observations for

both survey years. However, longitudinal analyses will be reweighted to adjust and ensure the estimates are nationally representative for all SFAs.

### **Longitudinal SFA Weights**

During the base year, the SFA survey data were weighted so that estimates are nationally representative of SFAs; variance estimation methods that appropriately reflect the complex sampling design were used. The State Child Nutrition Director survey did not require weighting or complex variance estimation since all state agencies were surveyed. Where appropriate, we went beyond simple cross-tabulations and used multivariate statistical models to examine the relationship between two variables controlling for covariates.

During Option Year 1, we will develop two sets of weights for analysis of data from the SFA Director survey: Cross-sectional weights and longitudinal weights. For the Option Year 1 SFA survey, we will design cross-sectional weights to produce nationally representative estimates of the SFA population at the time of the second round of data collection. These weights will be developed using the same procedure as for the cross-sectional base year weights. In addition, we will adjust the SFA base weights to account for the supplemental sampling. To construct appropriate nonresponse adjustment cells for the Option Year 1 survey, we will use information from the FNS and National Center for Education Statistics' Common Core of Data (CCD) databases, as well as data from the base year survey. The longitudinal

weights will include an adjustment to compensate for the loss of SFAs that responded in the base year, and were still eligible but did not respond in a subsequent year. The longitudinal weights can be used to estimate change among those SFAs that existed in the base year and that “survived” into the following year. A major distinction between the cross-sectional weights and longitudinal weights is that the former apply to respondents in the prior survey as well as to new respondents from the supplemental sample.

### **Proposed Outcome Measures**

Some of the analyses of Option Year 1 data will be longitudinal. Our first step will be to translate outcome measures for each of the research questions. However, longitudinal analyses raise additional issues that need to be considered when developing outcome measures. For example, the outcome measures to be analyzed must have the same metric in each of the data collection years because this will show any observed changes in the outcome measure that are due to changes in the underlying construct rather than to changes in how it was measured.

Information on meal prices and participation rates would be measured separately for full, reduced-price, and adult meals for breakfasts and lunches.

#### **b. Analysis On-Site Data**

In Year 2 (Option Year 1), descriptive, cross-sectional analyses of the quantitative on-site observations and interview data will be conducted. The analysis approach will depend on the scale of the item and the type of data obtained. Descriptive statistics, such as percentage for categorical variables as well as mean and standard deviation for continuous variables of interest will be computed for the whole sample and for subgroups of schools (e.g., elementary, middle, versus high schools; urban, suburban, versus rural schools).

### **c. 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).