

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

**Statement for Paperwork Reduction Act  
Submission**

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

**Part A: Justification**

**December 20, 2013**

**Office of Policy Support  
Food and Nutrition Service  
United States Department of Agriculture  
Project Officer: Allison Magness  
Telephone: 703-305-2098**

# Table of Contents

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## Pag

	<u>e</u>	
Introduction.....		A-3
<b>Part A: Justification.....</b>		<b>A-5</b>
A.1 Circumstances That Make the Collection of Information Necessary. ....		A-5
A.2 Purpose and Use of the Information.....		A-10
A.3 Use of Information Technology and Burden Reduction.....		A-13
A.4 Efforts to Identify Duplication and Use of Similar Information.....		A-14
A.5 Impact on Small Businesses or Other Small Entities.....		A-14
A.6 Consequence of Collecting the Information Less Frequently.....		A-14
A.7 Special Circumstances Relating to the Guidelines of 5 CFR 1320.5.....		A-15
A.8 Comments in Response to Federal Register Notice and Efforts to Consult Outside Agency.....		A-16
A.9 Explanation of Any Payment or Gift to Respondents.....		A-16
A.10 Assurance of Confidentiality Provided to Respondents.....		A-16
A.11 Justification for Densitive Questions.....		A-17
A.12 Estimates of Annualized Burden Hours and Costs. ....		A-17
A.13 Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers .....		A-20
A.14 Annualized Cost to the Federal Government.....		A-20
A.15 Explanation for Program Changes or Adjustments.....		A-20
A.16 Plans for Tabulation and Publication and Project Time Schedule.....		A-21
A.17 Reason(s) Display of OMB Expiration Date is Innapropriate.....		A-25
A.18 Exceptions to Certification for Paperwork Reduction Act Submission.....		A-25
<b>Part B. Collections of Information Employing Statistical Methods.....</b>		<b>B-3</b>

B.1	Respondent Universe and Sampling Methods.....	B-3
B.2	Procedures for the Collection of Information.....	B-5
B.3	Methods to Maximize the Response Rates and to Deal with Nonresponse.....	B-13
B.4	Test of Procedures or Methods to be Undertaken..	B-14
B.5	Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data.....	B-17

**Tables**

- Table A1. Estimates of respondent burden.....
- Table A2. Annualized cost to respondents 19
- Table A3. Data collection schedule 2
- Table B1. Distribution of eligible SFAs in the 2011-12 FNS-742 universe file
- Table B4. Expected sample sizes and corresponding standard error of an estimated proportion under proposed design for selected analytic domains

- Email Notification to Regional Offices
- CN and SFA Director Telephone Interviewer Scripts
- Thank You Letter to State CN Director.....
- Email Notification to State CN Directors
- Invitation Letter to SFA Directors
- Thank You Letter to SFA Director
- State CN Director Survey Year 3
- SFA Director Survey Year 3

## **INTRODUCTION**

The objective of the Special Nutrition Program Operations Study (SN-OPS) (OMB Number 0584-0562; Expiration date: 4/30/2016) 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 conducted during two previous school years. During the School Year (SY) 2011-12, surveys were conducted with all State Child Nutrition Directors and a sample of SFA Directors. During

SY 2012-13 follow-up surveys were conducted with a sample of SFA Directors and all State Child Nutrition Directors as well as a supplementary sample of SFA Directors. The sample for the follow-up survey included a majority of SFAs that participated during SY 2011-12 plus additional SFAs drawn from the *Verification Summary Report* data (known as FNS-742) (OMB Number 0584-0026; Expiration Date 4/30/2016) for SY (2011-12), which included SFAs new to the 2011-12 FNS-742 verification database. This study will be the third year and will utilize the same sample from SY 2012-13. Follow up surveys will be conducted with the sample of SFA Directors and all State Child Nutrition Directors. There will not be any onsite data collection efforts.

The surveys have been revised from the previous year by deleting some questions from sections and adding 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.

## **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 the previous two years of the study data were collected from a nationally representative sample of SFA Directors and a census of the State Child Nutrition Directors. This will be the follow-up to the previous two years of data collection conducted. During Year 3 of the study, the SFA Director and State Child Nutrition Director surveys will be conducted. Additionally, during Year 3, there will be no on-site data collection.

This OMB Package is for planned data collection activities in Year 3.



## **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 for free or at reduced price is based on family income. Children living in families earning at or below 130 percent of poverty qualify for free meals (\$30,615 for a family of four during the period July 1, 2013, through June 30, 2014); those living in families with incomes between 130 percent and 185 percent of poverty pay a reduced price for meals (185% of poverty is \$43,568 for a family of four during the period July 1, 2013, through June 30, 2014). These CN programs have provided a safety net for school-age children with increasing emphasis on improving their nutritional status. During the 2012 school year, NSLP provided lunch and after-school snacks to more than 31 million students each day in over 100,000 public and nonprofit private schools and in residential child care institutions nationwide. SBP provided breakfast to nearly 13 million students each day in over 89,000 schools. Only the NSLP and SBP Programs are permanently authorized, the

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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.

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 improve quality of school meals, implement health promoting policies, and remove barriers that keep children from participating in these programs.

In 2010, President Barack Obama signed the *Healthy, Hunger-Free Kids Act* (HHFKA) of 2010 into law. This law made numerous changes in the 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 are being 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, 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 0584-0413; Expiration Date: 9/30/1992) 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.

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<sup>2</sup> <http://www.fns.usda.gov/school-nutrition-dietary-assessment-study>.

These findings were instrumental in motivating efforts to improve the nutritional quality of school meals and changes in school meal program 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.<sup>5</sup>

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>6</sup> the second year report in July 2001;<sup>7</sup> and the third year report in June 2002.<sup>8</sup>

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<sup>3</sup> <http://www.fns.usda.gov/school-nutrition-dietary-assessment-study-ii>.

<sup>4</sup> <http://www.fns.usda.gov/school-nutrition-dietary-assessment-study-iii>.

<sup>5</sup> <http://www.fns.usda.gov/school-nutrition-dietary-assessment-study-iv>.

<sup>6</sup> <http://www.fns.usda.gov/school-meals-initiative-implementation-study-first-year-report>.

<sup>7</sup> <http://www.fns.usda.gov/school-meals-initiative-implementation-study-second-year-report>.

<sup>8</sup> <http://www.fns.usda.gov/school-meals-initiative-implementation-study-third-year-report>.

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.

**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 the previous two school years have 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 was 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 will be the primary source of information for all data collected. The information will be collected from a nationally representative sample of approximately 1,500 SFA director respondents and 56 State Child Nutrition Directors.

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

**Survey of State Child Nutrition Directors**

The CN Director survey is web based. All FNS Regional Offices will be sent an email asking them to alert the State CN Directors in their region about their important role in the SN-OPS Year 3 study (Appendix D1). All State Child Nutrition Directors will then be mailed an invitation letter (Appendix D2), requesting their participation in the study. The mail package will include a hardcopy of the survey instrument (Appendix E) for planning purposes. The package will also contain instructions on how to access the web survey as well as information about our toll-free help line and our email help desk. The Help Desk number is 1-866-465-7738, and the email help desk address is CNSurveyHelp@2mresearchservices.com. Help will be provided by one of our professional interviewers during regular business hours. Messages received 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 will be provided with the opportunity to save their progress and complete the survey in more than one session. An email will be sent to all CN Directors to confirm that the package arrived. This email will also include information on accessing the survey and the telephone and email help systems (Appendix D3.1). A reminder email will be

sent approximately 2 weeks later to the CN Directors who have not completed their survey (Appendix D3.2). If the web survey is not completed within four weeks after the initial questionnaire is received, trained interviewers will call CN Directors and remind them to respond to the survey (Appendix D4). The interviewers will offer assistance if needed and offer to complete any modules that the Director is ready to complete over the phone. Re-contact will occur weekly (Appendix D3.2, D4) until the end of the survey period at which time we will mail a thank you letter to the participants (Appendix D5). The data collection for the Survey of State Child Nutrition Directors will span 9 weeks.

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

The SFA Director survey is web based. Upon OMB approval, CN Directors will be notified by email that 2M Research Services and Mathematica Policy Research will soon begin to contact the selected SFAs in their State (Appendix D6). All sampled SFA Directors will be mailed an invitation letter (Appendix D7) requesting their participation in the study. The mail package will include a hardcopy of the survey instrument (Appendix F) for planning purposes. The package will also contain instructions on how to access the web survey as well as information about our toll-free help line and our email help desk. The Help Desk number is 1-866-465-7738, and the email help desk address is SFASurveyHelp@2mresearchservices.com. Help will be provided by one of our professional interviewers during regular business hours. Messages received 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 will be provided with the opportunity to save their progress and complete the survey in more than one session. An email will be sent to the SFA Directors to confirm that the package arrived. This email will also include information on accessing the survey and the telephone and email help systems (Appendix D8.1).

Reminder emails will be sent every two weeks for 6 weeks to the SFA Directors who have not completed their survey (Appendix D8.2). If the web survey is not completed within four weeks after the initial questionnaire is received, trained interviewers will call SFA Directors and remind them to respond to the survey (Appendix D4). The interviewers will offer assistance if needed and offer to complete any modules that the Director is ready to complete over the phone. Re-contact will occur weekly until the end of the survey period (Appendix D8.2, D4) at which time we will mail a thank you letter to the participants (Appendix D9). The data collection for the Survey of State Food Authority Directors will span 9 weeks.

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

The data collected will represent the third year that information has been collected from SFA Directors and State Child Nutrition Directors in this study. All State Child Nutrition Agencies and sampled SFAs will complete the respective survey once this 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 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/ops/research-and-analysis>.

**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. The surveys of the State Child Nutrition Directors and the SFA Directors will be web-based surveys. The CN and 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. Those that do not complete the web-based survey will be contacted by telephone, and data will be collected in an interviewer-administered survey mode.

**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 16 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 data collection from SFA Directors and State Child Nutrition Directors once during the school year. Gathering such data 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. 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 Thursday, October 3, 2013 (Vol. 78, No. 50, pp. 61324-61325). 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.

In addition to soliciting comments from the public, FNS is consulting with Jennifer Rhorer from National Agricultural Statistics Service (NASS) for expert consultation about the availability of data, the design, level of burden, and clarity of instructions for this collection.

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

The participants in the study 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 publicly 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**

	Type of respondents	Type of survey instruments	Appendix	Sample Size	Responsive					Non-Responsive					Total Annual hour burden	
					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	1	3	0	1	0	0.50	0	3.00	
	State Directors	Web-based Survey	E	56	53	1	53	2	106	3	1	3	0.08	0.25	106.25	
	State Directors	Invitation Letter*	D2	56	28	1	28	0.05	1.4	28	1	28	0.00	0	1.40	
	State Directors	Follow-up email	D3.1	56	28	1	28	0.05	1.4	28	1	28	0.00	0	1.40	
	State Directors	Reminder Email - Week 2*	D3.2	28	8	1	8	0.05	0.4	20	1	20	0.00	0	0.40	
	State Directors	Reminder Email - Week 4*	D3.2	20	4	1	4	0.05	0.2	16	1	16	0.00	0	0.20	
	State Directors	Reminder Email - Week 6*	D3.2	16	3	1	3	0.05	0.15	13	1	13	0.00	0	0.15	
	State Directors	Telephone Script - Week 7*	D4	13	8	1	8	0.083	0.667	5	1	5	0.00	0	0.67	
	State Directors	Telephone Script - Week 8*	D4	5	2	1	2	0.083	0.166666667	3	1	3	0.00	0	0.17	
	State Directors	Thank You Letter	D5	53	53	1	53	0.05	2.65	0	0	0	0.00	0	2.65	
	State Directors	Email Notification & FAQ	D6	53	53	1	53	0.05	2.65	3	0	0	0.00	0	2.65	
	SFA Directors	Hard copy pre-test	N/A	7	7	1	7	1.5	10.5	0	1	0	0.50	0	10.50	
	SFA Directors	Web-based Survey	F	1,875	1,500	1	1,500	2	3,000	375	1	375	0.083	31.25	3,031.25	
	SFA Directors	Invitation Letter	D7	1,875	563	1	563	0.05	28.15	1,312	1	1,312	0.00	0	28.15	
	SFA Directors	Follow-up email	D8.1	1,875	563	1	563	0.05	28.15	1,312	1	1,312	0.00	0	28.15	
	SFA Directors	Reminder Email - Week 2**	D8.2	1,312	328	1	328	0.05	16.40	984	1	984	0.00	0	16.40	
	SFA Directors	Reminder Email - Week 5**	D8.2	984	246	1	246	0.05	12.30	738	1	738	0.00	0	12.30	
	SFA Directors	Reminder Email - Week 7**	D8.2	738	185	1	185	0.05	9.25	553	1	553	0.00	0	9.25	
	SFA Directors	Telephone Script - Week 8**	D4	553	83	1	83	0.083	6.92	470	0	0	0.00	0	6.92	
	SFA Directors	Telephone Script - Week 9**	D4	470	56	1	56	0.083	4.67	414	1	414	0.00	0	4.67	
	SFA Directors	Telephone Script - Week 10**	D4	414	39	1	39	0.083	3.25	375	1	375	0.00	0	3.25	
	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	
	<b>TOTAL</b>				<b>1,941</b>	<b>1,563</b>	<b>3.40</b>	<b>5,313</b>	<b>0.624</b>	<b>3,313.27</b>	<b>378</b>	<b>16.35</b>	<b>6,179</b>	<b>0.005</b>	<b>31.50</b>	<b>3,344.77</b>

\* Based on declining response rates for email and telephone reminders until target of 53 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%.

Note: Appendix D1 is an email to FNS Regional Offices (not State or Local governments) and therefore has no burden.

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	3.00	\$ 37.72	\$ 113.16
<b>State Directors</b>	Web-based Survey	106.25	\$ 37.72	\$ 4,007.75
<b>State Directors</b>	Invitation Letter	1.40	\$ 37.72	\$ 52.81
<b>State Directors</b>	Follow-up email	1.40	\$ 37.72	\$ 52.81
<b>State Directors</b>	Reminder Email - Week 2	0.40	\$ 37.72	\$ 15.09
<b>State Directors</b>	Reminder Email - Week 4	0.20	\$ 37.72	\$ 7.54
<b>State Directors</b>	Reminder Email - Week 6	0.15	\$ 37.72	\$ 5.66
<b>State Directors</b>	Telephone Script - Week 7	0.67	\$ 37.72	\$ 25.15
<b>State Directors</b>	Telephone Script - Week 8	0.17	\$ 37.72	\$ 6.29
<b>State Directors</b>	Thank You Letter	2.65	\$ 37.72	\$ 99.96
<b>State Directors</b>	Email Notification & FAQ	2.65	\$ 37.72	\$ 99.96
<b>SFA Directors</b>	Hard copy pre-test	10.50	\$ 25.30	\$ 265.65
<b>SFA Directors</b>	Web-based Survey	3,031.25	\$ 25.30	\$ 76,690.63
<b>SFA Directors</b>	Invitation Letter	28.15	\$ 25.30	\$ 712.20
<b>SFA Directors</b>	Follow-up email	28.15	\$ 25.30	\$ 712.20
<b>SFA Directors</b>	Reminder Email - Week 2	16.40	\$ 25.30	\$ 414.92
<b>SFA Directors</b>	Reminder Email - Week 5	12.30	\$ 25.30	\$ 311.19
<b>SFA Directors</b>	Reminder Email - Week 7	9.25	\$ 25.30	\$ 234.03
<b>SFA Directors</b>	Telephone Script - Week 8	6.92	\$ 25.30	\$ 174.99
<b>SFA Directors</b>	Telephone Script - Week 9	4.67	\$ 25.30	\$ 118.07
<b>SFA Directors</b>	Telephone Script - Week 10	3.25	\$ 25.30	\$ 82.23
<b>SFA Directors</b>	Thank You Letter	75.00	\$ 25.30	\$ 1,897.50
<b>Total</b>		<b>3,344.77</b>		<b>\$ 86,099.75</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 \$528,670. The largest cost to the federal government is to pay a contractor \$527,983 over a 16-month period to conduct Year 3 of the study and deliver data files. This is based on an estimate of 4,277 hours, with a salary range of \$40.50 - \$206.10/ 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-13, step 1 at \$34.34 per hour for a total of \$686.60 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2013.

**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 revision to an existing information collection. Study Year 3, the subject of this ICR, includes web surveys to the sample of SFA Directors and all State Child Nutrition Directors that participated previously. Burden for Study Year 3 totals 3,345 burden hours, which is a program change (reduction) of 1,749 burden hours and increase of 2927 responses. The increase in responses is due to an increase in reminder and follow-up communication. However, since Study Year 3 removes the onsite data collection component, the change in burden hours results in a net reduction.

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

The third year of data collection will begin following OMB approval and run for approximately 13 weeks. Data file preparations will follow immediately so that data analysis can begin by August 29, 2014. The draft Year 3 report will be submitted to FNS by February 13, 2015, and presentation materials will be submitted by April 15, 2015.

There will be three types of products resulting from the analysis of data: Analytic data tables, a Year 3 report on the findings from the SFA Director survey, and a Year 3 report on the findings from the State Child Nutrition Director survey.

Table A3. Data collection schedule

Activity	Due date
Pretest of SFA and State Director surveys	January 10, 2014
Data Collection (SFA Survey and State CN Director Survey)	April 17 - July 31, 2014
Invitation letter to State CN Directors (Received)	June 2, 2014
Invitation letter to SFA Directors (Received)	April 17, 2014
Confirmation Email to CN Directors to verify receipt of survey package	June 6, 2014
Confirmation Email to SFA Directors to verify receipt of survey package	April 21, 2014
Email reminder sent out to SFA Directors	April 28, 2014
Another email reminder sent out SFA Directors	May 12, 2014
Telephone calls to SFA Directors to answer questions, remind them to complete the survey, and conduct survey	Beginning May 15, 2014
Email reminder sent out to CN Directors	June 20, 2014
Telephone calls to State CN Directors to answer questions, remind them to complete the survey, and conduct survey	Beginning July 1, 2014
Thank you letters mailed to SFA Directors	June 14, 2014
Thank you letters mailed to CN Directors	July 31, 2014
Data file preparation	August 1 - August 29, 2014
Data Analysis and Reporting	August 29, 2014 - April 14, 2015
Publication of findings	April 14, 2015

**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 school 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 -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 SY 2012-13 the Contractor conducted cross-sectional analyses similar to the prior year providing a “snapshot” of the current year and the new program data. Analyses of these data will be longitudinal as well, where appropriate. The Contractor will conduct cross-sectional analyses on any new research questions included in the SY 2013-14 SFA or the State Child Nutrition Director surveys that were not included in the previous instruments. The Contractor will also conduct longitudinal analyses over the three 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. Longitudinal analyses of the State Child Nutrition Director Survey will focus on issues related to resources and finances and operational procedures.

Similar to the cross-sectional analyses in the first and second year, most of the longitudinal analyses will also be descriptive in nature. Year 1 and Year 2 estimates calculated will serve as “baseline” measures of the Year 3 outcomes. We will produce similar cross-tabulations by subgroups for Year 3 data and compare estimates to Year 1 and Year 2 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 all survey years. Longitudinal analyses will be reweighted to adjust for nonresponse and ensure the estimates are nationally representative for all SFAs.

### **Longitudinal SFA Weights**

During the prior two years, the SFA survey data were weighted so that estimates were 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 and the nonresponses were small territorial agencies. Where appropriate, analysis went beyond simple cross-tabulations and used multivariate statistical models to examine the relationship between two variables controlling for covariates.

During Year 3, the Contractor will develop two sets of weights for analysis of data from the SFA Director Survey: cross-sectional weights and longitudinal weights. For the Year 3 SFA survey, the Contractor will design cross-sectional weights to produce nationally representative estimates of the SFA population at the time of the third round of data collection. These weights will be

developed using the same procedure as for the cross-sectional Year 2 weights. To construct appropriate nonresponse adjustment cells for the Year 3 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 Year 2. 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 Year 1 and that "survived" into the following years.

### **Proposed Outcome Measures**

Some of the analyses of Year 3 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. 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).