

Appendix J: National Agricultural Statistics Service (NASS) Comments

Page #	Comment	Response
Part A		
p. 4	SE-N1: From Appendix A, the Act states that a contract to conduct this study should be started “not less than 3 years after the date [December 13, 2010] of enactment of this Act.” OMB might inquire when the contract for this study was begun, so you might want to state the date explicitly in Supporting Statement A.”	Requested statement added at the end of paragraph 1 on page 4.
p. 19	SE-N2: What does this mean? If a specific law (Privacy Act? CIPSEA?) applies here, state it explicitly.	This means that we will keep information private unless it is subpoenaed. Our IRB requires that we include this phrase since we cannot absolutely guarantee that we won't divulge information. It does not refer to a specific law.
p. 19	SE-N3: Make sure this is stated in the publicity materials you give respondents, as well.	This is stated in the consent form and talking points for parents. We have added it to the Study Fact Sheet that sponsors and providers will receive.
p. 20	SE-N4: Perhaps state who is responsible for removing the identifying information and what guidelines they will follow.	Requested information added in last sentence on page 20.
p. 21	SE-N5: How does this tie in with Federal-Wide Assurance #664 cited in the confidentiality agreement (Appendix K)?	There is no relationship between the privacy Act and Federal-Wide Assurance (FWA). The FWA is an agreement between Abt and HHS/Office of Human Research Protection that we will protect the rights of research study participants
p. 23	SE-N6: The Act (Appendix A) stipulates that \$5 million is allocated to carry out this study. OMB may ask where the rest of the ~\$11 million total coming from	We have a contract in excess of the legislative amount as we had other research questions relating to CACFP beyond Section 223 in the legislation, and covering these questions in the same contract is more efficient and places less burden on the CACFP community. We are using other research funds from the Child Nutrition account to answer the other research questions.
Part B		

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p. 7	SE-N1: It's not clear what the age range of the study's target population of children is. I don't see this explicitly stated in either supporting statement. My assumption is that it's primarily children 5 years old and younger (the typical age range for children in daycare). But afterschool and at-risk programs are also mentioned, implying older children may be included. You should be clear about how the target population of children is defined. If it does not cover all ages under 18, you might want to explain that the definition "as those under age 18" used here is a proxy for the actual target population.	Sentence about the study's target population added at the bottom of p. 1.
p. 9	SE-N2: If possible, you might consider adding a column or two to this table with the size of the respondent universe (number of enrolled children, number of providers, or both) for each region. That way readers can get a sense of how the target population is distributed.	Requested data added to Table B.3.
p.11	SE-N3: I don't see precision levels given in section B.2.B or in Appendix M (referenced in section B.2.B). Section B.2.C is where you state your target precision ('MOE of +/- 5% at 95% confidence level', etc.).	Precision levels are in section B.2.C. Section reference corrected.
p. 11	SE-N4: I anticipate that the number of sites with no classrooms of at least 14 students will be large for children up to 5 years old. Based on my experiences and the external pressures on daycare facilities to keep low student-to-teacher ratios, actual practices might differ from the licensing guidelines referenced. You may want to expand on how the "threshold will be reduced" and how that will affect your statistical analysis.	Clarification of our plan added to the end of the first paragraph on the page.