

**Supporting Justification for OMB Clearance for the
Community Eligibility Provision (CEP) Characteristics
Study**

Part A

May 17, 2016

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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.

Circumstances that make the collection necessary. This is a new information collection request. This OMB Package is for planned data collection activities during school year (SY) 2016-17. Section 104(a) of the Healthy Hunger-Free Kids Act of 2010 (Public Law No. 111-296) amended section 11(a) (1) (the law) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1759a(a)(1) (Appendix E1) to provide an alternative to household applications for free and reduced- price (FRP) meals in high poverty local education agencies (LEAs) and schools.¹ This alternative is referred to as the Community Eligibility Provision (CEP).

To be eligible for CEP, an LEA, groups of schools, or an individual school must ensure that at least 40 percent of enrolled students in the year prior to implementing the provision are *identified students*. Identified students are students that are “directly certified” for free meals without a school meal application and are not subject to verification. They must also agree to serve free lunches and breakfasts to all students, regardless of household income; not collect school meal applications from households in participating schools, and agree to cover with non-Federal funds any costs of providing free meals to all students above amounts provided in Federal reimbursement.

¹ The Healthy Hunger-Free Kids Act of 2010 uses the term LEA to refer to the entities administering eligibility for the NSLP and SBP. Most LEAs are public school districts but others are independent public charter schools or private schools. NSLP legislation and regulations also refer to the entities administering the NSLP and SBP as school food authorities (SFAs).

Reimbursement is based on claiming percentages derived from the identified student percentage (ISP). The percentage of identified students is multiplied by a factor of 1.6 (established by law) to determine the total percentage of meals reimbursed at the Federal “free rate.” The remaining percentage of meals is reimbursed at the Federal “paid rate.”

In accordance with the law, CEP was phased in over a period of several years. The provision was available to eligible LEAs and schools in three States (Illinois, Kentucky, and Michigan) selected by U.S. Department of Agriculture’s Food and Nutrition Service (FNS) for the school year (SY) 2011-12. An additional four States (the District of Columbia, New York, Ohio, and West Virginia) were added for SY 2012-13. FNS selected four more States (Florida, Georgia, Maryland, and Massachusetts) for SY 2013-14. CEP became available nationwide to all eligible LEAs and schools beginning July 1, 2014. As a result, in SY 2014-2015, approximately 14,000 schools in more than 2,000 LEAs serving more than 6.4 million children elected to participate in CEP.

A report was submitted to Congress (OMB Number 0584-0570) that presented the results of an evaluation that examined the number of schools and LEAs that were eligible to receive special assistance payments under CEP, and described various attributes of those eligible schools and LEAs that elected or did not elect this provision during the first two years of implementation. The evaluation also examined the impact of electing to receive special assistance payments under CEP on program participation, revenues, availability and type of school breakfast, LEA administrative costs, program integrity, and meal quality. The final report can be found on the FNS Web site (<http://www.fns.usda.gov/community-eligibility-provision-evaluation>). The

Addendum describes the characteristics of LEAs and schools that participated in CEP in School Year 2013-14. It also describes how these characteristics differ for those high-poverty LEAs and schools that did *not* take up CEP.

With the expansion of CEP nationwide, it is necessary for FNS to collect new information to understand any operational issues and perceived barriers in adopting CEP. This study, the CEP Characteristics Study, will update the information from the Implementation Study component of the Community Eligibility Provision Evaluation (OMB Number 0584-0570) to be nationally representative. Additionally, this study will enable FNS to better understand the impacts of participation in CEP on student participation in school meals and per meal revenues as well as how the reimbursement formula currently used in CEP may impact participation in the Provision.

Legal or Administrative Requirements. This study is necessary to implement Sec. 28(a)(1) of the Richard B. Russell National School Lunch Act (Appendix E2). 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.).”

Furthermore, the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296, Sec. 305) amended Section 28 of the Richard B. Russell National School Lunch Act by adding the following (also in Appendix E2):

“(c) COOPERATION WITH PROGRAM RESEARCH AND EVALUATION.—States, State educational agencies, local educational agencies, schools, institutions, facilities, and contractors participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C. 1771 et seq.) shall cooperate with officials and contractors acting on behalf of the Secretary, in the conduct of evaluations and studies under those Acts.”

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.

How the information is to be used. The information will be used in three ways. First, the study will describe the differences between LEAs with schools participating in CEP (participating LEAs) and LEAs with schools that are eligible to participate in CEP but do not have any schools that have elected to participate in SY 2016-17 (non-participating LEAs). Any differences in characteristics and operations will be analyzed within the context of State operations and classifications of LEAs in terms of the size of their ISP, length of time eligible for CEP, location, school types, and student enrollments. This information may be used to target technical assistance to those eligible, non-participating LEAs. Second, the information will be used to conduct assessments of how participation in CEP impacts student participation in the NSLP and SBP and how it impacts per meal revenues. Analyses of CEP will rely on the administrative data of all eligible LEAs and schools and the survey data. Third, the information will be used to

assess the appropriateness and adequacy of the formula used for reimbursing schools operating under CEP. Currently, reimbursements depend on a multiplier (equal to 1.6) and FNS needs information on potential financial and participation implications from changes in this multiplier.

The CEP Characteristics Study posed numerous specific research questions (Appendix A) that will be answered by the three uses of the information described in this section.

From whom the information will be collected. Information will be collected from State Child Nutrition (CN) directors and nationally representative samples of participating and non-participating LEAs. For SY 2016-17, we estimate that there will be 52 State Agencies (SAs) (the 50 States plus the District of Columbia and Guam) with schools eligible for participation in CEP. Information from a census (N = 52) of these SAs will be collected using the State Child Nutrition Director Web Survey (State CN Director Survey) as presented in Appendix C1. A sample of twelve State CN directors will be asked to provide administrative data on all of their LEAs from SY 2013-14 through SY 2016-17 (Appendix C2).

Information will be collected from a nationally representative sample (n = 483) of participating LEAs. As noted above, participating LEAs are LEAs with at least one school that is eligible to participate in CEP and at least one school that participates during SY 2016-17. Appendix D1 contains the LEA Foodservice Director Web Survey: Eligible Participating LEAs (LEA Participating Survey). Information will also be collected from a nationally representative sample (n = 483) of non-participating LEAs—LEAs with at least one school that is eligible to participate in CEP but who do not have any schools participating in SY 2016-17. The LEA Foodservice

Director Web Survey: Eligible Non Participating LEAs (LEA Non-Participating Survey) is presented in Appendix D2.

How the information will be collected. The State CN Director survey is web based. All FNS Regional Offices (RO) will be sent an email asking them to alert the State CN directors in their region about their important role in the CEP Characteristics Study (Appendix B1). All State CN directors will then be mailed an invitation letter (Appendix B2), requesting their participation in the study. The mail package will include a hardcopy of the survey instrument (Appendix C1) for planning purposes. The package will also contain instructions on how to access the web survey as well as information about the contractor's toll-free help line and email help desk. The Help Desk number is 1-866-465-7738, and the email help desk address is support@2mresearch.com. Help will be provided by a trained support specialist during regular business hours. 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. Approximately one week after the mailing, a reminder email will be sent to the State CN directors who have not responded to the invitation letter (Appendix B3). This reminder email will confirm that the package arrived and include information on accessing the survey and the telephone and email help systems. The reminder email will be sent up to three more times to the State CN directors who have not completed their survey (Appendix B3).

If the web survey is not completed within 8 weeks after the initial questionnaire is received, trained interviewers will call State CN directors and remind them to respond to the survey (Appendix B4.1). 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 in approximately two times (biweekly intervals) until the end of the survey period (Appendix B4.1). At the end of the survey, we will mail a thank you letter to the participants (Appendix B5). The data collection period for the survey of State CN directors will span 12 weeks. If a respondent returns a completed hard copy of the survey, the responses will be entered into the database by the research team. From prior experience with web based surveys with telephone follow up, FNS expects that 90 percent of the responses will be received electronically.

The LEA Foodservice Director surveys are web based. The data collection procedures are the same for the participating and nonparticipating LEAs. At the beginning of the data collection period, State CN directors will be notified by email that the 2M Research Services and Abt Associates will soon begin to contact the selected LEAs in their State (Appendix B6). All sampled LEA directors will be mailed an invitation letter (Appendix B7) requesting their participation in the study. The mail package will include a hardcopy of the survey instrument (Appendix D1, Appendix D2) for planning purposes. The package will also contain instructions on how to access the web survey as well as information about the contractor's toll-free help line and email help desk. The Help Desk number is 1-866-465-7738, and the email help desk address is support@2mresearch.com. Help will be provided by a trained support specialist during regular business hours. 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. Approximately one week after the mailing, a reminder email will be sent to the LEA directors who have not responded to the invitation letter. This reminder email will confirm that the package arrived and include information on accessing the survey and the telephone and email help systems (Appendix B8). Reminder emails will be sent

three times over a period of 5 weeks to the LEA directors who have not completed their survey (Appendix B8). If the web survey is not completed within eight weeks after the initial questionnaire is received, trained interviewers will call LEA directors and remind them to respond to the survey (Appendix B4.2). 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 three times until the end of the survey period (Appendix B4.2) at which time a thank you letter will be mailed to the participants (Appendix B9). The data collection for the survey of LEA directors will span 14 weeks.

Frequency of information collected. All State CN directors and sampled LEAs will complete their respective survey once in SY 2016-17. To ease the burden of the request for administrative data (Appendix C.2), the selected twelve SA CN directors, will be asked to first participate in a trial data transfer to facilitate questions and answers about the request. After the trial transfer, State CN directors will be asked to make the final transfer of all data.

Information 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. 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 of 2002, to promote the use of technology. The surveys of the State CN directors and the LEA foodservice directors will be web surveys. The State CN and LEA foodservice directors will be contacted by email and 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 survey will be re-contacted by telephone, and data will be collected in an interviewer-administered (CATI) survey mode if requested by the respondent. Because the participants will receive a hard copy of the survey for planning purposes, there is a slight chance that someone may fill that out and return it. However, previous experience with web based surveys with telephone follow up indicate that 90 percent of the survey responses (approximately 742 responses) will be electronic--- either completed over the web or via CATI. The administrative data transfers will all (n = 12) be electronic.

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. Some questions in the survey have been drawn and modified from prior FNS studies. However, 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 has been held to the minimum required for the intended use. Although smaller LEAs are involved in this data collection effort, they deliver the same program benefits and perform the same function as any other LEA. Thus, they maintain the same kinds of information on file. The Healthy, Hunger Free Kids Act of 2010 makes cooperation in evaluations of school nutrition programs such as the CEP Participation Study mandatory. Out of 966 LEAs in this study, 322 are considered small entities.

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 LEA foodservice directors and State CN directors once during the 2016-17 school year. Gathering such data is essential to track the characteristics of eligible schools participating and not participating in CEP. In addition, the study identifies challenges, benefits, and operational issues of the new provision at the school and State level. The implementation of CEP has become an important policy issue that directly impacts schools as well as the nutritional well-being of our nation's youth. Not collecting the information would obstruct the agency's ability to keep abreast of the issues in administration and operation of CEP, 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 Wednesday, January 27, 2016 (Vol. 81, No. 4609, pp 4609 - 4610). No comments were received.

Consultations outside the agency

In addition to soliciting comments from the public, FNS consulted with Chunlin Dong 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 (Appendix G).

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.

FNS complies with the Privacy Act of 1974. No confidential information is associated with the burden related to the analysis, implementation, and database maintenance and the reporting of CEP operations and administrative data by the State and Local Education Authorities. The State CN directors are informed that their personal information (name, telephone number, and email) will be kept private but that their responses about agency operations may be tabulated by the State (Appendix B2). The LEA foodservice directors are informed that their personal information will be kept private and that their responses will only be used statistically in creating summary tabulations (Appendix B7). To ensure that personal information remains private, the contract executed between FNS and 2M Research Services, LLC requires that the contractor create and keep data on secure networks and utilize data collectors that sign confidentiality agreements binding them to protect private information. The contractor will assign a unique ID number to each participant and provide FNS the data by this ID number. A separate file will associate the ID number with personal information. FNS will keep this file private. Once the contract is over, the contractor will destroy their files with private information.

FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register* on April 25, 1991, volume 56, pages 19078-19080, that discusses the terms of protections that will be provided to respondents.

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.**

Table A.1 shows the estimates of the respondent burden for the proposed data collection, including the number of respondents, frequency of response, average time to respond, and annual hour burden. These estimates reflect consultations with program officials and the agency's prior experience in collecting data.

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table A.2 shows the estimated annualized cost to respondents. The estimate of respondent cost is based on the burden estimates and utilizes the U.S. Department of Labor, Bureau of Labor Statistics, May 2014 National Occupational and Wage Statistics, NAICS Code 999001, and Occupational Group 11-9051 for LEA foodservice directors and Occupational Group 11-9000 for State CN directors. The hourly mean wage for 11-9051 (Food Service Managers) is \$27.26 per staff hour, the hourly mean wage for 11-9000 (Other Management Positions) is \$45.60 per staff hour.

Table A.1 Estimates of respondent burden

| Type of respondents | Type of survey instruments | Appendix | Sample Size | Responsive | | | | | | Non-Responsive | | | | | Total Annual burden |
|-------------------------------|------------------------------|----------|--------------|-----------------------|-----------------------|------------------------|--------------------|-----------------------|--------------------------|-----------------------|------------------------|--------------------|-----------------------|-----------------|---------------------|
| | | | | Number of respondents | Frequency of response | Total Annual responses | Hours per response | Annual burden (hours) | Number of Non-respondent | Frequency of response | Total Annual responses | Hours per response | Annual burden (hours) | | |
| State CN Directors | Hard copy pre-test | N/A | 2 | 2 | 1 | 2 | 1 | 2 | 0 | 1 | 0 | 0.50 | 0 | 2.00 | |
| State CN Directors | Web-based Survey | C1 | 52 | 52 | 1 | 52 | 1 | 52 | 0 | 1 | 0 | 0.08 | 0 | 52.00 | |
| State CN Directors | Administrative Data Request | C2 | 12 | 12 | 1 | 12 | 24 | 288 | 0 | 0 | 0 | 0.00 | 0 | 288.00 | |
| State CN Directors | Invitation Letter | B2 | 52 | 21 | 1 | 21 | 0.05 | 1.05 | 31 | 1 | 31 | 0.00 | 0 | 1.05 | |
| State CN Directors | Follow-up email* | B3 | 31 | 12 | 1 | 12 | 0.05 | 0.6 | 19 | 1 | 19 | 0.00 | 0 | 0.60 | |
| State CN Directors | Reminder Email - Week 2* | B3 | 19 | 8 | 1 | 8 | 0.05 | 0.4 | 11 | 1 | 11 | 0.00 | 0 | 0.40 | |
| State CN Directors | Reminder Email - Week 4* | B3 | 11 | 4 | 1 | 4 | 0.05 | 0.2 | 7 | 1 | 7 | 0.00 | 0 | 0.20 | |
| State CN Directors | Reminder Email - Week 6* | B3 | 7 | 3 | 1 | 3 | 0.05 | 0.15 | 4 | 1 | 4 | 0.00 | 0 | 0.15 | |
| State CN Directors | Telephone Script - Week 7* | B4.1 | 4 | 2 | 1 | 2 | 0.083 | 0.167 | 2 | 1 | 2 | 0.00 | 0 | 0.17 | |
| State CN Directors | Telephone Script - Week 8* | B4.1 | 2 | 2 | 1 | 2 | 0.083 | 0.167 | 0 | 1 | 0 | 0.00 | 0 | 0.17 | |
| State CN Directors | Thank You Letter | B5 | 52 | 52 | 1 | 52 | 0.05 | 2.6 | 0 | 0 | 0 | 0.00 | 0 | 2.60 | |
| State CN Directors | Email Notification & FAQ | B6 | 52 | 52 | 1 | 52 | 0.05 | 2.6 | 0 | 0 | 0 | 0.00 | 0 | 2.60 | |
| LEA Foodservice Managers (P) | Hard copy pre-test | N/A | 6 | 6 | 1 | 6 | 1.5 | 9 | 0 | 1 | 0 | 0.50 | 0 | 9.00 | |
| LEA Foodservice Managers (P) | Web-based Survey | D1 | 483 | 386 | 1 | 386 | 2 | 772 | 97 | 1 | 97 | 0.083 | 8.08 | 780.08 | |
| LEA Foodservice Managers (P) | Invitation Letter | B7 | 483 | 145 | 1 | 145 | 0.05 | 7.25 | 338 | 1 | 338 | 0.00 | 0 | 7.25 | |
| LEA Foodservice Managers (P) | Follow-up email** | B8 | 338 | 85 | 1 | 85 | 0.05 | 4.25 | 253 | 1 | 253 | 0.00 | 0 | 4.25 | |
| LEA Foodservice Managers (P) | Reminder Email - Week 2** | B8 | 253 | 51 | 1 | 51 | 0.05 | 2.55 | 202 | 1 | 202 | 0.00 | 0 | 2.55 | |
| LEA Foodservice Managers (P) | Reminder Email - Week 5** | B8 | 202 | 10 | 1 | 10 | 0.05 | 0.50 | 192 | 1 | 192 | 0.00 | 0 | 0.50 | |
| LEA Foodservice Managers (P) | Reminder Email - Week 7** | B8 | 192 | 10 | 1 | 10 | 0.05 | 0.50 | 182 | 1 | 182 | 0.00 | 0 | 0.50 | |
| LEA Foodservice Managers (P) | Telephone Script - Week 8** | B4.2 | 182 | 36 | 1 | 36 | 0.083 | 3.00 | 146 | 1 | 146 | 0.00 | 0 | 3.00 | |
| LEA Foodservice Managers (P) | Telephone Script - Week 9** | B4.2 | 146 | 29 | 1 | 29 | 0.083 | 2.42 | 117 | 1 | 117 | 0.00 | 0 | 2.42 | |
| LEA Foodservice Managers (P) | Telephone Script - Week 10** | B4.2 | 117 | 20 | 1 | 20 | 0.083 | 1.67 | 97 | 1 | 97 | 0.00 | 0 | 1.67 | |
| LEA Foodservice Managers (P) | Thank You Letter | B9 | 386 | 386 | 1 | 386 | 0.05 | 19.30 | 0 | 0 | 0 | 0.00 | 0 | 19.30 | |
| LEA Foodservice Managers (NP) | Hard copy pre-test | N/A | 3 | 3 | 1 | 3 | 1.5 | 4.5 | 0 | 1 | 0 | 0.50 | 0 | 4.50 | |
| LEA Foodservice Managers (NP) | Web-based Survey | D2 | 483 | 386 | 1 | 386 | 1 | 386 | 97 | 1 | 97 | 0.083 | 8.08 | 394.08 | |
| LEA Foodservice Managers (NP) | Invitation Letter | B7 | 483 | 145 | 1 | 145 | 0.05 | 7.25 | 338 | 1 | 338 | 0.00 | 0 | 7.25 | |
| LEA Foodservice Managers (NP) | Follow-up email** | B8 | 338 | 85 | 1 | 85 | 0.05 | 4.25 | 253 | 1 | 253 | 0.00 | 0 | 4.25 | |
| LEA Foodservice Managers (NP) | Reminder Email - Week 2** | B8 | 253 | 51 | 1 | 51 | 0.05 | 2.55 | 202 | 1 | 202 | 0.00 | 0 | 2.55 | |
| LEA Foodservice Managers (NP) | Reminder Email - Week 5** | B8 | 202 | 10 | 1 | 10 | 0.05 | 0.50 | 192 | 1 | 192 | 0.00 | 0 | 0.50 | |
| LEA Foodservice Managers (NP) | Reminder Email - Week 7** | B8 | 192 | 10 | 1 | 10 | 0.05 | 0.50 | 182 | 1 | 182 | 0.00 | 0 | 0.50 | |
| LEA Foodservice Managers (NP) | Telephone Script - Week 8** | B4.2 | 182 | 36 | 1 | 36 | 0.083 | 3.00 | 146 | 1 | 146 | 0.00 | 0 | 3.00 | |
| LEA Foodservice Managers (NP) | Telephone Script - Week 9** | B4.2 | 146 | 29 | 1 | 29 | 0.083 | 2.42 | 117 | 1 | 117 | 0.00 | 0 | 2.42 | |
| LEA Foodservice Managers (NP) | Telephone Script - Week 10** | B4.2 | 117 | 20 | 1 | 20 | 0.083 | 1.67 | 97 | 1 | 97 | 0.00 | 0 | 1.67 | |
| LEA Foodservice Managers (NP) | Thank You Letter | B9 | 386 | 386 | 1 | 386 | 0.05 | 19.30 | 0 | 0 | 0 | 0.00 | 0 | 19.30 | |
| TOTAL | | | 1,029 | 835 | 3.05 | 2,547 | 0.630 | 1,604.30 | 194 | 17.12 | 3,322 | 0.005 | 16.17 | 1,620.47 | |

* Based on 40 percent response rate for email and telephone reminders until target of 52 respondents are reached.

** Based on declining response rates on subsequent contacts until target of 386 respondents is reached. Initial response rate is 30%.

Note: Appendix B1 is an email to FNS Regional Offices (not State or Local governments) and therefore has no burden.

Table A.2. Annualized cost to respondents

| Type of respondents | Type of survey instruments | Total Annual hour burden | Hourly Wage | Respondent Cost |
|-------------------------------|--------------------------------|--------------------------|-------------|---------------------|
| State CN Directors | Hard copy pre-test | 2.00 | \$ 45.60 | \$ 91.20 |
| State CN Directors | Web-based Survey | 52.00 | \$ 45.60 | \$ 2,371.20 |
| State CN Directors | Administrative Data Collection | 288.00 | \$ 45.60 | \$ 13,132.80 |
| State CN Directors | Invitation Letter | 1.05 | \$ 45.60 | \$ 47.88 |
| State CN Directors | Follow-up email | 0.60 | \$ 45.60 | \$ 27.36 |
| State CN Directors | Reminder Email - Week 2 | 0.40 | \$ 45.60 | \$ 18.24 |
| State CN Directors | Reminder Email - Week 4 | 0.20 | \$ 45.60 | \$ 9.12 |
| State CN Directors | Reminder Email - Week 6 | 0.15 | \$ 45.60 | \$ 6.84 |
| State CN Directors | Telephone Script - Week 7 | 0.17 | \$ 45.60 | \$ 7.60 |
| State CN Directors | Telephone Script - Week 8 | 0.17 | \$ 45.60 | \$ 7.60 |
| State CN Directors | Thank You Letter | 2.60 | \$ 45.60 | \$ 118.56 |
| State CN Directors | Email Notification & FAQ | 2.60 | \$ 45.60 | \$ 118.56 |
| LEA Foodservice Managers (P) | Hard copy pre-test | 9.00 | \$ 27.26 | \$ 245.34 |
| LEA Foodservice Managers (P) | Web-based Survey | 780.08 | \$ 27.26 | \$ 21,265.07 |
| LEA Foodservice Managers (P) | Invitation Letter | 7.25 | \$ 27.26 | \$ 197.64 |
| LEA Foodservice Managers (P) | Follow-up email | 4.25 | \$ 27.26 | \$ 115.86 |
| LEA Foodservice Managers (P) | Reminder Email - Week 2 | 2.55 | \$ 27.26 | \$ 69.51 |
| LEA Foodservice Managers (P) | Reminder Email - Week 5 | 0.50 | \$ 27.26 | \$ 13.63 |
| LEA Foodservice Managers (P) | Reminder Email - Week 7 | 0.50 | \$ 27.26 | \$ 13.63 |
| LEA Foodservice Managers (P) | Telephone Script - Week 8 | 3.00 | \$ 27.26 | \$ 81.78 |
| LEA Foodservice Managers (P) | Telephone Script - Week 9 | 2.42 | \$ 27.26 | \$ 65.88 |
| LEA Foodservice Managers (P) | Telephone Script - Week 10 | 1.67 | \$ 27.26 | \$ 45.43 |
| LEA Foodservice Managers (P) | Thank You Letter | 19.30 | \$ 27.26 | \$ 526.12 |
| LEA Foodservice Managers (NP) | Hard copy pre-test | 4.50 | \$ 27.26 | \$ 122.67 |
| LEA Foodservice Managers (NP) | Web-based Survey | 394.08 | \$ 27.26 | \$ 10,742.71 |
| LEA Foodservice Managers (NP) | Invitation Letter | 7.25 | \$ 27.26 | \$ 197.64 |
| LEA Foodservice Managers (NP) | Follow-up email | 4.25 | \$ 27.26 | \$ 115.86 |
| LEA Foodservice Managers (NP) | Reminder Email - Week 2 | 2.55 | \$ 27.26 | \$ 69.51 |
| LEA Foodservice Managers (NP) | Reminder Email - Week 5 | 0.50 | \$ 27.26 | \$ 13.63 |
| LEA Foodservice Managers (NP) | Reminder Email - Week 7 | 0.50 | \$ 27.26 | \$ 13.63 |
| LEA Foodservice Managers (NP) | Telephone Script - Week 8 | 3.00 | \$ 27.26 | \$ 81.78 |
| LEA Foodservice Managers (NP) | Telephone Script - Week 9 | 2.42 | \$ 27.26 | \$ 65.88 |
| LEA Foodservice Managers (NP) | Telephone Script - Week 10 | 1.67 | \$ 27.26 | \$ 45.43 |
| LEA Foodservice Managers (NP) | Thank You Letter | 19.30 | \$ 27.26 | \$ 526.12 |
| Total | | 1,620.47 | | \$ 50,591.70 |

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 \$1,003,493.49. The largest cost to the federal government is to pay a contractor \$1,000,368.97 over a 36-month period to of the study and deliver data files and reports. 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 a total of 60 hours of Federal employees' time: 32 hours for a GS-14, step 10 Senior Program Analyst serving as the FNS project officer (FNS Headquarters) at \$67.83 per hour for a total of \$2,170.56 and 28 hours for GS-12, step 1 program analysts serving as FNS regional study liaisons (FNS ROs) at \$34.07 per hour for a total of \$953.96 on an annual basis, for a total cost of \$3,124.52. Therefore, the annualized cost is \$334,497.83. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2016. The Headquarters' rate is for Washington-Baltimore-Northern Virginia, while the RO rate is the national base rate.

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

This submission is a new information collection request as a result of program changes and will add 1,621 burden hours and 5,869 responses to OMB's information collection inventory.

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

The first year of data collection will begin on January 16, 2017, and run for approximately 19 weeks. Data file preparations will follow immediately so that data analysis can begin by June 1, 2017. The draft Year 1 report will be submitted to FNS by April 10, 2018, and presentation materials will be submitted by August 1, 2018.

There will be two types of products resulting from the analysis of data: Analytic data tables and a final report containing all findings. Table A.3 shows the data collection schedule.

Table A.3. Data collection schedule

| Activity | Due date |
|---|--|
| Pretest of LEA and State Director surveys | February 15-March 15, 2015 |
| Data Collection (LEA Survey and State CN Director Survey) | Starting January 16, 2017 and lasting 19 weeks |
| Invitation letter to State CN Directors (Received) | 1 week after starting date |
| Confirmation Email to CN Directors to verify receipt of survey package | 2 weeks after starting date |
| Email reminder sent out to CN Directors | Starting 3 weeks after starting date and lasting 5 weeks |
| Telephone calls to State CN Directors to answer questions, remind them to complete the survey, and conduct survey | Starting 8 weeks after start date and lasting 4 weeks |
| Thank you letters mailed to CN Directors | 12 weeks after starting date |
| Invitation letter to LEA Directors (Received) | 1 week after starting date |
| Confirmation Email to LEA Directors to verify receipt of survey package | 2 weeks after starting date |
| Email reminder sent out to LEA Directors | Starting 3 weeks after starting date and lasting 5 weeks |
| Telephone calls to LEA Directors to answer questions, remind them to complete the survey, and conduct survey | Starting 8 weeks after start date and lasting 6 weeks |
| Thank you letters mailed to LEA Directors | 14 weeks after starting date |
| Data file preparation | 19 weeks after OMB approval and lasting 4 weeks |
| Data Analysis and Reporting | 23 weeks after starting date and lasting 16 weeks |

a. Analysis of the Survey Data

The analysis of the survey and administrative data will be tabulated to provide comparisons of State and LEA operations and the characteristics of LEAs and schools participating and not participating in CEP. Descriptive statistics including frequency distributions, summary statistics, and cross tabulations will be generated for each research question; as appropriate for the research questions, analyses will be presented by school type, LEA size, poverty level, FNS Region, and other characteristics.

b. Analysis of the State Administrative Data

The State Administrative Data will be used to examine the conditional differences in identified outcomes between participating and non-participating LEAs and schools. The analyses will include difference-in-difference, comparative interrupted time series, and post-test comparison estimations.

c. Method 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).