

**Supporting Statement for OMB Clearance for
Successful Approaches to Reduce Sodium in School Meals**

Part A

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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.

The USDA’s Food and Nutrition Service (FNS) is responsible for increasing food security and reducing food insecurity, in partnership with cooperating organizations, by providing children and low-income people access to food, a healthy diet, and nutrition education. FNS administers 15 nutrition assistance programs, including the National School Lunch Program (NSLP) and the School Breakfast Program (SBP).

Federal Regulations (7 CFR Part 210.10) set nutrient and meal pattern requirements for school meals, including targets for sodium levels.¹ Specifically, school meals offered must meet, on average over the school week, the levels of sodium specified by age/grade group in the regulations. The sodium target deadlines are listed below in Table A1.

Table A1. USDA Sodium Targets

Grades	Target 1: July1, 2014 SY 2014–2015 (mg)	Target 2: July1, 2017 SY 2017–2018 (mg)	Target 3: July1, 2022 SY 2022–2023 (mg)
School Breakfast Program			
K–5:	≤ 540	≤ 485	≤ 430
6–8:	≤ 600	≤ 535	≤ 470
9–12:	≤ 640	≤ 570	≤ 500
National School Lunch Program			
K–5:	≤ 1,230	≤ 935	≤ 640
6–8:	≤ 1,360	≤ 1,035	≤ 710
9–12:	≤ 1,420	≤ 1,080	≤ 740
Source: U.S. President Final Rule. <i>Nutrition Standards in the National School Lunch and School Breakfast Programs</i> . Federal Register 77, no. 17, (January 26, 2012). https://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf			

¹ U.S. President Final Rule. *Nutrition Standards in the National School Lunch and School Breakfast Programs*. Federal Register 77, no. 17, (January 26, 2012). Retrieved from: <https://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf>

This study, aims to identify, among School Food Authorities (SFAs) that are successfully meeting Sodium Target 1 and close to meeting, meeting, or exceeding Target 2: successes and challenges faced by schools; successful strategies, tools, resources and technical assistance SFAs have been employing; and strategies, tools, resources and technical assistance that are still needed to achieve the sodium targets for school meals programs. Best practices identified in the study can be used to provide technical assistance to SFAs for developing lower sodium menus, as required by the federal regulations. Perspectives will be gathered from SFA directors, school administrators, food suppliers, and community-based stakeholders.

Successful Approaches to Reduce Sodium in School Meals is a new data collection.

Respondents required to participate, as stated in Section 305 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), include SFA directors and school administrators participating in programs authorized under this Act and the Child Nutrition Act of 1966 (42 U.S.C 1771 et seq.).^{2,3} Participation is voluntary for food suppliers and community-based stakeholders.

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.

The purpose of this study is to identify the best practices employed by SFAs that have successfully met Target 1 sodium requirements and are close to meeting, meeting, or exceeding Target 2 sodium requirements in their schools. The findings will be helpful for SFAs and schools that have difficulty meeting the sodium targets, by providing insight into ways that other similar SFAs have overcome obstacles to successfully serve school meals that meet the sodium requirements. Other important considerations for identifying best practices include the acceptability of meals to children and the additional cost (if any) of providing lower sodium

² Public Law No: 111-296. (December 13, 2010). <https://www.congress.gov/bill/111th-congress/senate-bill/3307>

³ Public Law No: 89-642. (October 11, 1966). http://www.fns.usda.gov/sites/default/files/CNA_1966_12-13-10.pdf

meals. The study will also provide information about the availability of, and strategies for, procuring lower sodium foods for schools to purchase and serve. The specific research questions for this project are detailed in Appendix A1.

This study will collect information from SFA directors, school administrators,⁴ school food suppliers,⁵ and individual community-based stakeholders.⁶

The study's data collection activities include Prescreening Web Surveys with SFA directors (Appendix B1); Brief Site Visit Selection Interviews with SFA directors (Appendix B2b); on-site and telephone In-Depth Interviews with four respondent types (SFA directors [Appendix B3], school administrators [Appendix B4], food suppliers [Appendix B5], and community-based stakeholders [Appendix B6]), and observational instruments to supplement on-site In-depth Interviews (Appendix B7–B10). SFA directors may respond up to three times (Prescreening Web Survey, Brief Site-Visit Selection Interview,⁶ and telephone In-Depth Interview or on-site In-Depth Interview plus observational instrument); and school administrators, food suppliers, and community-based stakeholders will complete either a telephone or an on-site In-Depth Interview one time.

Prescreening Web Survey

Regional FNS office directors, select State agency CN directors in the 48 contiguous States and District of Columbia, and SFA directors selected for participation in the Prescreening Web Survey will be notified of the study by email (Appendix C1a, C1b, and C1c, respectfully).

The Prescreening Web Survey completed by SFA directors will verify which SFAs have

⁴ Defined as a school administrator or other employee who is knowledgeable about, or has been instrumental in promoting or working with students on the acceptance of, and changes to, nutrition in their school. These individuals could include a principal, assistant principal, nurse, an administrator, a staff member on a local school wellness committee, or teacher, for example.

⁵ Defined as an individual or part of an organization that delivers meals, food, or ingredients to an SFA or school(s) for use in school meals. These individuals could be local manufacturers, distributors, vendors, local farmers, or local food hubs.

⁶ Defined as someone who has a strong interest, even enthusiasm, for improving the school food environment and is someone who has been instrumental in efforts to improve the school food environment. These individuals are not employed by the schools, but are aware of, or attuned to, child nutrition. This individual may be a parent, community member, school board member, or a non-school employee member of a school wellness committee.

successfully met the Target 1 sodium requirements and are either meeting, close to meeting, or exceeding Target 2 in most or all of their schools, and will also collect preliminary information on approaches SFAs use to reduce sodium in school meals. The information gained from this survey will be used to identify SFAs to be contacted for the Brief Site Visit Selection Interview. Once the Prescreening Web Survey is sent, SFA directors may be contacted up to two times by email (Appendix C2 and C3) and up to four times by telephone (Appendix C4) to receive a reminder and encouragement to complete the Prescreening Web Survey.

Brief Site Visit Selection Interview

The Brief Site Visit Selection Interview with SFA directors will verify each SFA's status of meeting Target 1 and 2 sodium standards and collect contact information for the following respondent types: school administrators, food suppliers, and community-based stakeholders. This information will then be used to determine which of the eligible sites (i.e., SFAs that have met Target 1) will be selected for In-Depth Interviews, either on-site or by telephone. SFA directors may be contacted up to two times by telephone and once by email (Appendix C5) to encourage and confirm participation in the Brief Site Visit Selection Interview. A follow-up email (Appendix C11) will be sent to SFA directors following the Brief Site Visit Selection Interview to verify or obtain requested contact information. Those who are not selected for an In-Depth Interview will be sent a thank you letter (Appendix C9) to show appreciation for their contribution to the study.

In-Depth Interviews

Telephone and on-site In-Depth Interviews will be conducted with all four of the previously mentioned respondent types. SFA directors, school administrators, food suppliers, and community-based stakeholders may be contacted up to three times by telephone (Appendix C6) and two times by email (Appendix C7 and C8) to encourage and confirm participation in the

telephone and on-site In-Depth Interviews. The In-Depth Interviews will collect extensive information on successes and challenges while working towards reducing sodium in school meals, as well as strategies, best practices, tools, or resources that supported sodium reduction efforts.

Observational Instruments

The observational instruments will be used to collect additional information, by examining the cafeteria environment and communication materials such as posters, letters sent to parents, and news articles, from each of the four respondent types (SFA directors, school administrators, food suppliers, and community-based stakeholders) who are interviewed on-site. This information will provide a triangulation of data collected on sodium reduction efforts during In-Depth Interviews through an objective process. These data will be analyzed using both descriptive statistics (for the quantitative data) and emerging themes (for the qualitative data). Each of the respondents will be sent a thank you letter (Appendix C9) to show appreciation for their contribution to the study.

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 Prescreening Web Survey sent to SFA directors will be web-based (n=500). The Brief Site Visit Selection Interview with SFA directors will be conducted by telephone using computer-assisted telephone interviewing (CATI) software (n=45). All respondent types (SFA directors, school administrators, food suppliers, and community-based stakeholders) will participate in the In-Depth Interviews (n=144). Although some In-Depth Interviews will be

conducted on-site (n=40; SFA directors: n=10; school administrators: n=10; food suppliers: n=10; community-based stakeholders: n=10), most will be completed by telephone (n=104; SFA directors: n=26; school administrators: n=26; food suppliers: n=26; community-based stakeholders: n=26). Since the Prescreening Web Survey and Brief Site Visit Selection Interview will involve the use of information technology for data collection, 79 percent of responses to data collection instruments are expected to be submitted through automated systems.

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, and none of these sources provide the necessary data to answer the research questions.

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

The information being requested for this study has been held to the minimum required for the intended use. FNS estimates that up to 2 percent of SFAs are “small entities,” which equates to approximately 10 SFA director respondents. Although smaller SFAs will be involved in this data collection effort, they deliver the same school meals program benefits and perform the same function as any other SFA. Thus, they maintain the same kinds of information on file. Food suppliers and community-based stakeholders who participate in the In-Depth Interview may represent a small business or a small organization. FNS expects similar (2 percent) participation from food suppliers and community-based stakeholders, which equates to approximately one of these respondent types. The collection of the information requested will not have a significant economic impact on the small businesses.

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.

All data collection for the proposed study will be conducted once during school year (SY) 2016–17. Without this effort, which has been planned to address the research questions with the minimum possible burden, FNS will not have the information necessary to advise SFAs on the best ways to meet the sodium targets outlined in the Federal Regulations (7 CFR Part 210.10), which could adversely impact the NSLP and SBP.

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 will be conducted in a manner consistent with the guidelines in the Code of Federal Regulations, 5 CFR 1320.

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.

A.8.a Federal Register notice and comments

Notice of this study was published in the *Federal Register* (Volume 81, No. 51, pages 14082–14083) on March 16, 2016. There were 12 responses received; however, one was a duplicate (and thus withdrawn), one did not contain a comment, and another was a reposting of the 60-day notice (Appendices D2.1–D2.12). The remaining nine comments included concern about the lack of taste of lower sodium foods, food waste, the labor force and skillset needed for schools to be able to do more scratch cooking, challenges experienced in efforts to meet Target 1, and anticipated barriers to meeting Target 2. There was also expressed interest in the use of spices as a salt substitute. Two of the comments (Appendices D2.1 and D2.11) resulted in changes to the In-Depth Interview data collection instrument designed for SFA directors. One question with a sub-question was added to collect information on how SFAs communicate the health benefits of sodium reduction to their staff and students (in response to Appendix D2.1). Two sub-questions were added to capture barriers associated with scratch cooking and use of employee trainings on scratch cooking (in response to Appendix D2.7). The addition of these questions resulted in an increased burden by 2 minutes to the SFA In-Depth Interview. FNS provided responses to the eight comments that provided contact information (Appendices D3.1–D3.8).

A.8.b Consultations outside the agency

Seven respondents were consulted about the burden estimate and other characteristics of the collection (i.e., frequency, clarity of instructions): two SFA directors, one school teacher, two

employees of two national food distribution companies, and two parents who served on wellness committees for their child’s school. Respondents in the pretest included one or more of the respondent types from the following organizations: Lake Dallas ISD, Sarasota County Schools, and Worcester Public Schools. Contact information for these organizations is presented in Table A2.

Table A2. Contact Information for Organizations that Participated in Pretest

Organization Name	Address	Telephone Number
Lake Dallas ISD	104 Swisher Road Lake Dallas, TX 75065	(940) 497-4039
Sarasota County Schools	101 Old Venice Road Osprey, Florida 34229	(941) 486-2199
Worcester Public Schools	20 Irving Street Worcester, MA 01609	(508) 799-3132

In addition to soliciting comments from the public, Prakash Adhikari from the National Agricultural Statistics Service (NASS) provided expert consultation on the availability of data, the sampling design, level of burden, and response rates for this collection. Contact information for the NASS representative is presented in Table B4 of Part B. Appendix D4 presents the comments provided by NASS.

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 or gift.

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. All information gathered from SFA directors, school administrators, food suppliers, and community-based stakeholders participating

in this study is for research purposes only and will be kept private to the full extent allowed by law. Data from the data collection efforts will be presented in aggregate form and therefore cannot be linked back to the response of any individual. All food supplier and community-based stakeholder respondents will be verbally consented using a standardized script (Appendix C10), indicating that their personal information will be kept private and that their responses will only be used for summary tabulations and statements of best practices. Verbal consent will be obtained prior to the collection of any data. FNS published a system of record notice (SORN) titled FNS-8 USDA/FNS Studies and Reports in the *Federal Register*, volume 56, pages 19078–19080, on April 25, 1991, that discusses the terms of protections that will be provided to respondents. 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 (Appendix A2) binding them to protect private information. The Contractor will assign a unique ID number to each respondent and provide the data to FNS by this ID number. A separate file will associate the ID number with personal information. The Contractor will keep this file private. Once the contract is over, the Contractor will destroy the files with private information.

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

Appendix D1 shows the estimates of the respondent burden for the proposed data collection. A summary appears below. These estimates are informed by pretesting of instruments and protocols and reflect consultations with FNS program officials and the agency's prior experience with data collection.

Estimated Number of Respondents and Non-Respondents: 657 respondents and 152 non-respondents

Estimated Frequency of Responses per Respondent and Non-Respondent: average of 4 responses per respondent and 20 responses per non-respondent

Estimated Total Annual Responses from Respondent and Non-Respondent: 2,364 from respondents and 3,082 from non-respondents

Estimated Time per Response per Respondent and Non-Respondent: 0.16 hours per response per respondent and 0.02 hours per response per non-respondent

Estimated Total Annual Burden Hours on Respondents and Non-Respondents: 371.95 hours on respondents and 61.19 hours on non-respondents

Grand Total Burden Estimate: 433.14 hours

Table A3 shows the estimated annualized cost to respondents. This cost has been calculated using average hourly earnings for May 2015, obtained from the Bureau of Labor Statistics' estimates for occupational employment wages.

Table A3. Annualized Cost to Respondents

Respondent Type	Appendix ID	Instrument	Total Annual Burden Estimate (Hours)	Hourly Wage	Cost to Respondent
State Agency CN Directors	C1b	Notification Email to State Agency CN Directors	0.98	\$53.47	\$52.40
SFA Director	C1c	Attachment Notification Email to SFA Directors	10.00	\$25.79	\$257.90
	C2	Prescreening Web Survey Invitation Email	17.19	\$25.79	\$443.27
	C3	Prescreening Web Survey Reminder Email	20.62	\$25.79	\$531.73
	C4	Prescreening Web Survey Phone Script	44.16	\$25.79	\$1,138.97
	B1	Prescreening Web Survey Questionnaire	125.00	\$25.79	\$3,223.75
	C5	Brief Interview Confirmation and Preparation Email	1.54	\$25.79	\$39.72
	B2a	Brief Site Visit Selection Interview Reminder Phone Script	3.63	\$25.79	\$93.51
	B2b	Brief Site Visit Selection Interview Guide	14.78	\$25.79	\$381.28
	C11	Brief Site Visit Selection Interview Follow-Up Email	1.97	\$25.79	\$50.84
	C6a	In-Depth Interview Invitation Phone Script	2.69	\$25.79	\$69.32
	C7a	In-Depth Interview Invitation Email	0.87	\$25.79	\$22.34
	C8a	In-Depth Interview Confirmation and Preparation Email	6.00	\$25.79	\$154.77
	B3	SFA Director In-Depth Interview Guide	39.01	\$25.79	\$1,006.02
	B7	In-Depth Interview Observational Instrument	2.64	\$25.79	\$68.01
C9	In-Depth Interview Thank You Letter	0.72	\$25.79	\$18.57	
School Administrator	C6b	In-Depth Interview Invitation Phone Script	3.00	\$43.74	\$131.32
	C7b	In-Depth Interview Invitation Emails	1.24	\$43.74	\$54.13
	C8b	In-Depth Interview Confirmation and Preparation Email	1.80	\$43.74	\$78.73
	B4	School Administrator In-Depth Interview Guide	36.18	\$43.74	\$1,582.51
	B8	In-Depth Interview Observational Instrument	4.84	\$43.74	\$211.70
	C9	In-Depth Interview Thank You Letter	0.72	\$43.74	\$31.49
Food Supplier	C6b	In-Depth Interview Invitation Phone Script	3.03	\$19.72	\$59.83
	C7c	In-Depth Interview Invitation Email	1.20	\$19.72	\$23.59
	C8c	In-Depth Interview Confirmation and Preparation Email	1.80	\$19.72	\$35.50
	B5	Food Supplier In-Depth Interview Guide	36.00	\$19.72	\$709.92
	B9	In-Depth Interview Observational Instrument	2.64	\$19.72	\$52.06
	C9	In-Depth Interview Thank You Letter	0.72	\$19.72	\$14.20
	C10	Participant Consent Form Script	1.44	\$19.72	\$28.40
Community-Based Stakeholder	C6b	In-Depth Interview Invitation Phone Script	3.05	\$23.23	\$70.85
	C7d	In-Depth Interview Invitation Email	1.09	\$23.23	\$25.37
	C8d	In-Depth Interview Confirmation and Preparation Email	1.80	\$23.23	\$41.81
	B6	Community-Based Stakeholder In-Depth Interview Guide	36.00	\$23.23	\$836.28
	B10	In-Depth Interview Observational Instrument	2.64	\$23.23	\$61.33
	C9	In-Depth Interview Thank You Letter	0.72	\$23.23	\$16.73
	C10	Participant Consent Form Script	1.44	\$23.23	\$33.45
Total			433.14		\$11,651.59

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 capital/start-up or ongoing operation/maintenance costs associated with this information collection.

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 \$661,771.32, which pays the Contractor over a 3-year period to conduct the study and deliver data files and reports. This information collection also assumes a total of 14 hours of Federal employee time (estimating 2 hours of time from each of the seven Regional Offices to encourage participation from SFA directors and answer questions) over a 3-year period: for GS-12, step 6 at \$43.32 per hour, for a total of \$606.48 on an annual basis. Federal employee pay rates are based on the General Schedule of the Office of Personnel Management (OPM) for 2016. Thus, the annualized cost is \$220,590.44.

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 new information collection request as a result of program changes and will add 433.14 burden hours to OMB's inventory.

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

A.16.a Study Timeline

Data collection will begin in January 2017 following OMB approval, and continue for approximately 18 weeks. Data file preparation will follow immediately so that data analysis can begin in June 2017. A summary of the findings will be delivered to FNS in November 2017. The draft of the Final Report and Executive Summary will be submitted to FNS in July 2018, and is expected to be available to the public in August of 2018. The project timeline is reported in Table A4 below.

Table A4. Data Collection Schedule

Activity	Due Date
Determine Sample Frame (SFA Directors)	October–December 2016
Recruitment for Prescreening Survey (SFA Directors)	December 2, 2016–February 3, 2017
Data Collection (Prescreening Web Surveys)	January 16–February 3, 2017
Train Data Collectors (Brief Site Visit Selection Interviews)	March 1, 2017
Recruitment for Brief Site Visit Selection Interview (SFA Directors)	February 22–March 10, 2017
Data Collection (Brief Site Visit Selection Interviews)	March 6–March 10, 2017
Recruitment for In-Depth Interviews (SFA Directors, School Administrators, Food Suppliers, Community-Based Stakeholders)	March 6–May 26, 2017
Train Data Collectors (In-Depth Interviews)	March 30, 2017
Data Collection (In-Depth Interviews)	April 4–May 26, 2017
Data Analysis	June 1–November 17, 2017
Prepare Final Report	November 17–July 18, 2018
Final Report and Executive Summary	July 18, 2018

A.16.b Analysis of the data

Data collection instruments include both quantitative and qualitative questions. Numerical data (e.g., district level enrollment data, percent free/reduced-price school meal information, etc.) will be collected during the Prescreening Web Survey. These data will be analyzed using descriptive statistics and cross tabulations. Open-ended responses (text data) will be coded using NVivo to identify themes for analysis. Specifically, qualitative data will be

analyzed to (a) examine the market availability of school foods that meet new sodium standards; (b) determine market acceptance of new lower sodium manufactured products; (c) discuss best practices, strategies, and tools that SFAs and schools have found successful in promotion of lower sodium foods; (d) detect any technical assistance needs of schools and SFAs to meet to sodium requirements; (e) determine how industry manufacturers can support SFAs and schools in promoting new, lower sodium items; and (f) ascertain any geographic differences among schools that meet lower sodium standards.

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).